

# **SUMMARY OF SUBMISSIONS**

To Variation 38

Rural Issues

Proposed Wairau/Awatere Resource Management Plan





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**Appendix 1. Alexander, M G Et Al. – Full List of Individual Submitters.**  
**Appendix 2: Contact Details for Submitters in Alphabetical Order**  
**Appendix 3: Contact Details for Submitters in Order of Participant Number**

(Note: A 132 submitters submitted the same submission, for reasons of brevity, these submissions are not listed individually but are listed under the name of *Alexander, MG et al.* If a particular submitters name does not appear in this summary, check Appendix 1 to see if they have been listed under that name. Subsequently, if you wish to place a further submission in support or opposition to the relief sought under the name of *Alexander, MG et al.* you will need to consult Appendix 1 for the full list of submitters who sought that relief. Please note: a separate further submission form is required for every further submission made).

## *Submission Summary - Variation 38 - By Section*

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### **V38 - Variation 38- Submissions on the Entire Variation**

#### **Ayson & Partners Limited - Participant #: 43 Submission #: 449**

Proposed variation 38 promotes the use of plan changes, clearly that is not practical under the present situation where we do not have an operative plan.

Marlborough is experiencing pressures in all direction through commercial activities and the need for industrial and residential expansion. We can see a situation in the near future where this is going to be a significant impediment to the development of Marlborough.

Recent reports have shown over the next 10 years a need for an additional 4000 residential sites in Marlborough and clearly that cannot be achieved if we delay having an operative plan or do not have additional areas rezoned.

The difficulty with tinkering of the plan is it will never become operative, and in the meantime it is impractical for any private plan changes to be introduced.

Every variation provides further opportunity for submitters to appeal to Council's decision thus extending the time before the plan can become operative.

If the Council do not proceed with addressing the issues of the expansion for Marlborough, then the only option would be for private plan changes to be introduced.

**Relief Sought:** Variation 38 should be abandoned and the council should immediately proceed with all urgency to have an operative district plan, or alternatively should immediately re-zone additional commercial, industrial and residential land to accommodate future needs.

#### **Barnet,, GJ & J S - Participant #: 236 Submission #: 5526**

I agree with proposals to limit the restriction on the use of versatile soils. However the wider area of Rural 4 zone is a reasonably good place to make available life style blocks.

The wording makes a loose reference to the environment and landscape and what constitutes a working rural environment.

Landscape of waste areas could be enhanced significantly e.g. Wairau River berms council owned land.

Major roads should be made more user friendly and traffic should be discouraged from Old Renwick Road.

**Relief Sought:** None specified

#### **Dodson, R C & J W - Participant #: 31 Submission #: 329**

Variation 38 is not the correct response. The proposals are negative controls, rather than positive planning rules.

The 60 page document is difficult to read and understand. The intentions and interpretation is not always clear and some points are contradictory.

Variation 38 will stifle or kill off developments, will cease rural subdivision and thereby negating property owners' rights to do what they want with their "freehold" property.

RMA

Council's job is to manage the effects of activities, not to control those activities.

Variation 38 seems to be pushing towards any natural features or landscapes which is not acceptable and not the intention of the RMA (section 6b). Variation 38 is contrary to section 6 Part II and therefore is not following the basic tenets of the RMA.

#### Section 32

Variation 38 does not comply with the requirements of section 32. Where is any cost/benefit analysis of say 1ha allotment, (Thames) 2ha (Kaikoura), 4ha Waimakariri), 8ha (our Rural 3), 20ha (proposed Rural 4)? Where is the cost benefit proof that 8ha Rural 3 has been good? No cost benefit facts, just sweeping statements.

Where is the cost benefit analysis of workers accommodation aspects? This aspect is not "necessary" and therefore does not comply.

We believe that the proposed changes are not the most appropriate means of attending to the needs to our people arising from the change of land use of our rural sector. The problem is not to impose controls on development, but to handle the effects of development. Variation 38 is not the most appropriate or effective means.

#### Conclusion

We are concerned with many aspects of variation 38 and the review document. We support the sustainable maintenance principle, but council must concentrate on the effects. Not just the developments.

***Relief Sought:*** None specified

#### **Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 5678**

There has been inadequate section 32 analysis and consultation regarding residential activity in Rural 4 zone.

***Relief Sought:*** None specified

#### **Gilbert Haymes & Associates Limited - Participant #: 232 Submission #: 5471**

It is wrong to expand variation 38 to include the rural four zone without consulting the landowners in that zone. Section 32 analysis indicates that no consultation has taken place beyond the rural three zone. The implications of variation 38 are not understood by the public and may not have been fully understood by the decision makers at the time the decision was made to include the rural four zone. The variation will have a long-term effect on the development of the province and will stunt the ability of people of Marlborough to take care of their economic well being.

There is no need to introduce severe limitations such as 80 square meter limit on dwellings for dependent relatives.

Our suggestion is to place on hold variation 38 and advertise a change to the definition of "residential activity" to the plan.

Variation 38 seeks legal standing to two landscape working groups and also the guidelines. There is no general input or selection process involving the community for private land working groups. Such a group cannot be given status within the plan. There are no guarantees that such a group would exist in a year or two. The landscape guidelines are just that guidelines they're not rules. It is wrong for the guidelines to be given any status and all reference to the guidelines should be removed.

The most significant problem with the variation is removal of the flexibility that is available in the current plan and the act. We believe that 95% of the applications that we prepare do not meet the controlled activity status. This suggests that the plan is not meeting the needs of the community.

There is not sufficient flexibility for council to consider reasonable small scale rural subdivisions. The policies are just too defined and contain no flexibility. The more we use variation 38 the more

clear it is that there are going to be problems. The use of the plan change process is also a significant concern. It is wrong for council to limit the use of only certain parts of the RMA with respect to considering proposals.

We have a significant concerns on the inclusion of objectives and policies relating to roading issues together with related rules. Such policies effectively place the control of development on the Wairau Plains in the hands of Marlborough Roads or Transit New Zealand.

It is difficult to determine why council considers it necessary for workers to live in townships. Worker accommodation should be encouraged. It would not appear that the implications for Rural 4 were taken into account when making this decision.

A significant number of policies are too vague and not defined in any way e.g. "the expected working rural landscape of the rural three zone".

**Relief Sought:** Withdraw variation 38

**Hawkesbury Farm Limited - Participant #: 239 Submission #: 5566**

Effects and implications not read or understood by most landholders especially Rural 4. Limiting housing to 80 square meters and dependent relatives is discriminatory. Future accommodation may be needed for employees.

The variation seeks to give legal status to the 2 landscape working groups without a community wide election process.

Variation 38 will take away flexibility create a whole lot of new laws and be costly and impossible to police.

**Relief Sought:** Re-debate variation 38.

**Horticulture New Zealand - Participant #: 27 Submission #: 290**

Horticulture NZ is concerned as to the extent to which "versatile soils" is included in Variation 38. It is acknowledged that versatile soils is included in the Plan but the extent to which it is further incorporated in the Variation is a concern, given the much of the rural development and production in Marlborough is undertaken on land that may not be classed as "versatile".

Soils are only one of the matters that need to be provided for to enable commercial production to occur. Primacy to one component distorts the full consideration of such matters and fails to give recognition to all components of the production system.

The RMA requires that the "life supporting capacity of the soil" be safeguarded. This requirement relates to all soils, not just certain classes. The test of the plan should be the extent to which the rules and methods are required to safeguard the life supporting capacity - not protection per se.

Given the changing role of land use in the District, it is considered that the focus on versatile soil should be changed to reflect all soils and not a specific group or area.

**Relief Sought:** Amend the plan to ensure that the focus is on the life supporting capacity of the soil, and not just "versatile" soils and land.

**Kerr D C - Participant #: 14 Submission #: 175**

Variation 38 was to include wind frost machines that have ruined the aesthetic value of Marlborough.

10 year old plan is flawed.

All other district plans require resource consent.

All other plans measure dBA at 300m, not 100m.

Dept of Labour requires code of compliance certificate before machines operate - could we and affected parties be supplied with certificates.

Cumulative effects need to be recognised.

Govt standard for noise shouldn't be compromised by sellers of machines funding Council and supplying consultant figures.

Absentee owners must comply to operative standards. They shouldn't be consulted regarding community issues.

Variation 38 restricts 8ha owners but does nothing to redress viticulture dissemination of conventional history - 100yr gums etc

**Relief Sought:** Address wind machines in the Variation

**Mapp, L C & V L - Participant #: 74 Submission #: 1045**

We strongly oppose variation 38. Having spent a lifetime developing 305ha of near worthless scrub and riverbed into a productive farm we expect to have the right to dispose of it to our advantage and discretion.

**Relief Sought:** Oppose the Variation.

**Marris, John & Alison - Participant #: 234 Submission #: 5520**

Oppose the variation as the objectives policies & rules fail to provide for development within the Rural 4 Zone. Restrictions on Rural Residential development within the Rural 3 Zone will result in increased pressure for residential and Rural Residential sites within the Rural 4 Zone. Specific provisions should be incorporated into the plan to provide for clustered Rural Residential development within areas of less versatile soils in the Rural 4 Zone.

**Relief Sought:** Incorporate specific provisions into the plan to provide for clustered Rural Residential development within areas of less versatile soils in the Rural 4 Zone.

**Marris, John & Alison - Participant #: 234 Submission #: 5504**

Support changes to the objectives policies and rules seeking increased restrictions on urban development in the Rural 3 Zone (other than on the residential/rural interface). The restrictions will prevent rural fragmentation that is currently occurring as a result of a uncontained subdivision and development.

**Relief Sought:** Accept the proposed amendments.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 5659**

The section 32 analysis carried out by the Council relates only to the Rural 3 zone and is inadequate in terms of its consideration of the Rural 4 zone. The plan change is therefore deficient in terms of its section 32 analysis.

**Relief Sought:** Reconsideration of the whole issue is appropriate.

**Outer Limits Limited - Participant #: 48 Submission #: 458**

The variation fails to address the existing and foreseeable demands as required by section 5 of the RMA. It does not address the existing demonstrable demand and need for the type of zone proposed by the submitter on its own land. It does not recognise the section 7 imperatives for the efficient use of resources. It fails to recognise that properly planned and mitigated developments at the interface of existing rural and urban developed area can meet section 5 and 7 needs and will not significantly impact on the soil resource. By not considering future planned development, Council is abdicating its responsibility under section 5 of the RMA.

It is essential there is proper integrated planning for the expansion of urban activities, development of further Rural Residential zones without due planning would prevent proper planning and development of urban areas.

**Relief Sought:** The intended zoning pattern for the Outer Limits Ltd land be included in the text in an



appropriate place and on the planning maps.

**Outer Limits Limited - Participant #: 48 Submission #: 457**

The section 32 introduction does not cover the needs for industrial and commercial expansion.

The background section potentially conflicts with other business related growth needs in the urban fringe. The urban growth issue has to be addressed more vigorously than it has in the Rural 3 review. Consideration of the soil's productive capacity is but one matter to take into account. There is no mention of other key urban activities of industry and commercial business or expansion options. There is also no reference anywhere in the Plan or the RPS about an urban growth strategy. The urgent need for more commercial and industrial land to be made available in the very near future requires more immediate action. Variation 38 needs to recognise this unmet demand now.

The Outer Limits Ltd proposal (for rezoning) needs to be introduced into the formal variation process immediately to have the proposition tested in the public arena. It is of concern that variation 41 is still in its early stages with no final commitment to its commencement, or inclusion of development of Outer Limits Ltd land. If variation 41 was to proceed and the timelines of the 2 variations were subsequently to coincide at some point, then the 2 variations should effectively be merged and dealt with together.

The part B legislative review does not mention the pressure for urban growth on the rural environment as being a significant issue.

The section on the proposed plan mentions key rural issues, but not urban growth as part of this review. This needs to be addressed in the variation.

Draft variation - part c of the report:

There is a need to identify appropriate locations for development to ensure that the land resource is being appropriately managed and that urban growth will not be restricted because of inappropriate location of Rural Residential blocks. The recent residential growth study did not properly address the directions and locations where growth would be most appropriately accommodated.

The roading section identified commercial activity being in conflict with the roading network.

Rural Residential blocks should only be located in areas away from key locations where urban expansion is most likely - after some comprehensive structure planning of the peripheral areas has been undertaken. The north-western sector between Springlands and Woodbourne is still the most logical growth sector in terms of proximity to existing services and infrastructure capacity.

The report indicated that significant matters needed resolution through the MRPS review. The urban expansion issue is too significant to wait until that review. It needs to be addressed immediately and thus variation 38 has to accommodate this.

Part D - section 32 evaluation:

Variation 38 should be extended to include more detailed work on the residential development and expansions options, and industrial and commercial land demand and development options. These matters are just as significant for the Rural 3 variation as subdivision and activity controls.

The evaluation of volume 1 (pg 28/30) needs to be modified to take account of the urgent unmet demand for expansion of business activity into the urban rural fringes. A variation needs to be promoted in light of the latest development proposals by Outer Limits Ltd.

The residential section (pg 28) made no reference to Rose St. The justification for any zone change should be included in this material and should include Rose St.

Council has recognised that there is a shortfall of appropriately zoned land for service industries and large format retail activity that will not fit within existing zoned areas. Those areas should have been included in this variation.

The report (pg 31) needs to recognise urban growth has to accommodate industrial and business expansion which will have to occur in the Rural 3 land.

The expansion of urban areas should be along or closely adjacent to arterial routes.

The report's explanation of the Rose St rezoning should be modified to accommodate the change in its development proposal for the Rose St frontage sites. This explanation should be included in the variation text to demonstrate why it has been changed.

It is not necessary to have special requirements for development to be treated as limited discretionary on "contaminated" land. This can be dealt with in the usual way with the production of a site contamination and remediation report.

The policy changes have not been fully or adequately addressed in the variation in its present form the events and information received by council over the past 2 years as to the demand for urban expansion for business and industrial activity need to be provided for by zoning provision now.

A zoning change as proposed by Outer Limits Ltd should be implemented through the variation 38 process. Objectives and policies also need to be modified.

**Relief Sought:** That if some explanatory material is to be incorporated into the variation document, then the amendments proposed are included in that text.

**Powell, Brian & F - Participant #: 223 Submission #: 5418**

The variations will have considerable impact on the profitability, future development, cost of compliance, and any subdivision we may want to do. Council should not become involved in farming management. The costs/benefits of the RMA have not been adhered to.

RMA's failure to provide compensation for property confiscated (e.g. esplanade reserves) must be first addressed before any decisions made on planning for Rural 3 and 4.

**Relief Sought:** RMA's failure to provide compensation for property confiscated (e.g. esplanade reserves) must be first addressed before any decisions made on planning for Rural 3 and 4.

**PYG Limited - Participant #: 238 Submission #: 5559**

There is virtually no reference to the Rural 4 zone in section 32 analysis yet that is included in the proposed variation. We're particularly concerned over the landscape issues, land use issues and protection of indigenous forest within the Rural 4 zone. Proposed controls on development and the use of land restrict the ability of landowners to make the best economic use of their property. It is not the place of the plan to impose rules on landscape amenity values and natural characters as there is wide variation as to what is acceptable and appropriate.

**Relief Sought:** Delete reference to Rural 4 zone.

**Sherwood, Nancy - Participant #: 61 Submission #: 6984**

Similar consideration of rural issues should be applied to the Wairau Valley and this extended area should be taken into account.

**Relief Sought:** Take into account rural issues in the Wairau Valley.

**Transit New Zealand - Participant #: 24 Submission #: 208**

Transit New Zealand has a statutory obligation to operate the state highway system in a way that contributes to an integrated, safe, responsive and sustainable land transport system. Transit New Zealand considers that the proposals are compatible with Transit's statutory obligation and with the overall purpose of the Resource Management Act.

**Relief Sought:** Support

**Tyson, Tony - Participant #: 218 Submission #: 5406**

Variation is confusing between Rural Zone 3 and 4. It would be better to clarify the issues by dealing with Rural Zone 3 and Rural Zone 4 individually as the 2 zones have different issues. Rural Zone 4 should be a "spill over" from Rural Zone 3.

Landscaping should be addressed, but not by decree. Also need guidelines on trees to plant.

Farming in my area of Rural Zone 4 is not economic. Already we are seeing forestry blocks being rezoned for lifestyle.

Change is constant and irreversible and we need a clear vision on the way forward before embarking on rule-based planning.

**Relief Sought:** Deal with Rural 3 and Rural 4 Zones separately.

**Vercoe Ian Frank - Participant #: 242 Submission #: 5588**

Support Mike & Karen Gray's submission as follows:

Residential zoning was bought to our back fence in 1994. We were informed that as we were self sufficient in water and sewerage and the council could not provide these for us at that time, we would stay zoned Rural 3 until those services could be provided. Since then we have fought several attempts to establish industrial or commercial operations in the old wood and coal site.

In 2002 nearly all landowners on the east side of Battys Rd submitted a petition to the council to have our 8 sections rezoned from Rural 3 to urban residential. Council passed a resolution in response that "the landowners who sought rezoning be advised that their request for a variation to the...plan will be considered as part of the council's review of the provisions regarding the Rural 3 zone."

Variation 38 (pg 49) states that the main concern of the area to be rezoned is the risk of flooding. Since the Covent gardens subdivision has gone in, all our properties have noticed a reduction in surface water. Over the last 3 years our place has dried up significantly.

We wish to have the urban residential zone extended out to the natural boundary of Battys road to include no. 31.

**Relief Sought:** Support following request :

Rezone the 8 sections on the east side of Battys Rd (including no. 31) as Urban Residential 2.

**Weyerhaeuser New Zealand Limited - Participant #: 84 Submission**

WNZI supports the variations to the plan that promote and protect the working rural environment, provided the Rural Residential zone locations do not constrain permitted rural activities such as forestry.

Use of a plan change to recognise the importance of legitimate rural activities when considering subdivision or development is supported.

Clear parameters are required to sustainably manage settlement in the rural zones.

MDC should be congratulated for taking the initiative and investigating the pressures of development in rural land.

**Relief Sought:** Support

**Adcock Paul & Devir Nicki - Participant #: 51 Submission #: 488**  
**Adcock, G & B V - Participant #: 81 Submission #: 1090**  
**Adcock, Ian - Participant #: 82 Submission #: 1091**  
**Anderson, Bruce - Participant #: 54 Submission #: 491**  
**Boon, D R & S A - Participant #: 56 Submission #: 493**  
**Higgins, Mark & Katrina - Participant #: 55 Submission #: 492**  
**Lansdown, Sam - Participant #: 53 Submission #: 490**  
**Slape, Kelvin - Participant #: 52 Submission #: 489**

We oppose variation 38 and think that the rules and consent process should stay as it is.

**Relief Sought:** Retain existing rules and consent process.

**Alexander ,M G et al. ((See Appendix 1 for the full list submitters requesting this relief).**

#### GENERAL

It is not appropriate for council to become arbitrator of subjective "good taste" through voluntary landscape provisions. Landowners must have the right to express themselves. Costs of landscape provision also not been addressed.

Major issue of compensation has not been addressed.

Variation 38 has not apparently complied with section 32 RMA, 4a. There is no evidence that a cost benefit analysis has been done.

No action should be taken on public access (section 6 RMA) until the government panel review of property rights is completed.

There has been insufficient consultation with rural residents, in particular those in Rural 4.

#### SUBDIVISION

Minimum allotments sizes of 8ha and 20ha needs review. In Rural 3 and 4 now many allotments less than this and wider variation in other areas. The 8ha approach is inflexible and unsustainable.

Economic size is highly variable and there are other uses which could result in satisfactory economic returns. Also the disposal of property to give the greatest return to the owner is a property right.

Restricting subdivision and development to the present availability of roading is contrary to the mechanics of growth.

#### ACCOMMODATION

restricting worker accommodation to villages is inappropriate. Restricting one house per title is inappropriate particularly in Rural 4 where some titles are in excess of 1000ha. This should be the landowner's decision, not council planners.

The requirement to remove the house on transfer of title or cessation of occupation by dependent relatives is costly, unreasonable and unacceptable. Limiting such dwellings to 80sqm is arbitrary.

**Relief Sought:** More flexibility in the size of a subdivision.

### **Gen - General Submissions on Variation 38**

**Butt Drilling Limited - Participant #: 13 Submission #: 174**

The rules must be changed to allow resource consents to be undertaken quicker.

**Relief Sought:** None specified

**Clintondale Trust - Participant #: 23 Submission #: 186**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic

environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Support the draft variation in principle, invites consideration of :

1. The 8ha standard be maintained as the minimum for rural subdivision.
2. Subject to the 8ha caveat, the one title/one residence principle be observed.
3. No further Rural Residential areas be established in the Rural 3 & 4 zone.
4. Existing Rural Residential areas be restricted from further subdivision or increased density.
5. Future Rural Residential areas be limited to identified locations of non-primary productive land.
6. Further policy be established that mitigation impacts of primary production activities falls both on the producer and potentially affected residents.
7. Subdivision consents in rural and Rural Residential zones stipulate measures to mitigate impacts of primary production activities.
8. Subdivision consents be augmented by building permits that stipulate further mitigation initiatives including design, orientation, insulation and sound barriers.
9. Any policy or rules be unequivocally documented, unambiguously interpreted, and consistently applied / enforced
10. A holistic oversight mechanism be established to ensure the plan's individual; policies and

**Dodson, R C & J W - Participant #: 31 Submission #: 331**

**DWELLINGS PER TITLE**

MDC state there is a community expectation of one dwelling per title. There are plenty of farms with more - dairy farms always had sharemilkers houses, many larger farms have more.

Restrictions on the number and size of dwellings allowed (as of right) to only one house per title is inappropriate. The requirement to have a dwelling removed on transfer of title or cessation of occupation by dependent relatives is costly, unreasonable, and unacceptable. Parents who transfer their farm to their son must have the right to stay living on their farm where they have been all their lives.

One dwelling per title leaves security of any farm wide open, with just the family off to town for weekly shopping. Every additional dwelling means more eyes watching and enhanced security.

A large vineyard with project manager, support services manager and staff foreman living on site, together with workers accommodation would not fit the proposal.

**Relief Sought:** None specified

**Dodson, R C & J W - Participant #: 31 Submission #: 330**

**WORKER ACCOMMODATION ON FARMS**

Many farms still have accommodation facilities. The system works, why change it? It is really more important to have accommodation for vineyard workers because they are needed for much longer periods than shearers? We are not convinced of the accommodation proposals. It does not appear to recognise the needs of workers accommodation in agriculture. Workers living together on the job tend to develop a fellowship which is good for work relationships. Staff need to be on call to help at odd times and can work exceptionally long hours with seasonal work. It shows an ignorance of farming in this district to suggest workers' accommodation be sited in adjacent

**Relief Sought:** None specified

**Dodson, R C & J W - Participant #: 31 Submission #: 336**

**INDUSTRIAL COMMERCIAL PROPOSALS**

We seem to have two proposals for new commercial warehouse developments both on really good land. The Eastlake proposal seems on the way. Why can it not be located about 2-3 minutes further out of town, near the saleyards on what is poor quality grazing land?

**Relief Sought:** None specified

**Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 234**

There is considerable reference to "versatile soils" throughout Variation 38. The Federation feels this term is meaningless, and deviates from the requirements of the RMA to preserve the life supporting capacity of the soils.

**Relief Sought:** Either delete all references to "versatile soils", or in the alternative, amend versatile soils to read "life supporting capacity of soils".

**H & J Meyers Partnership - Participant #: 2 Submission #: 13**

The main sewer line runs parallel to SH1. There is no opportunity for private property owners and residential housing to connect from the east of the pumping station. Allowance has been made for commercial connection.

**Relief Sought:** None specified

**Horticulture New Zealand - Participant #: 27 Submission #: 287**

The variation seeks to reduce potential for conflicts and incompatibilities between varying uses in the rural zone. It is essential that potential residents in the rural areas are aware of the type of management practices that are part of the activity in the rural areas. Title searches do not cover or reveal these issues and the focus should be on sources of information. Methods proposed to address this are:

- advisory notes included in relevant parts of the plan;
- a copy of the advisory note to be attached as a consent notice to all subdivision consents in the rural area;
- a copy of the advisory note be included in all the LIMs for such properties;
- information sheets be prepared by council detailing the type of activities that occur in rural areas and seek a wide range of distribution mechanisms.

Such mechanisms would ensure that the nature of the area is clearly stated so that expectations of a quiet ambient rural environment are not falsely held.

**Relief Sought:** 1.Council develop information advice sheets for people considering living in the rural zone in Marlborough outlining the nature of activities that can be undertaken in the zone; and

2.That advisory notes will be used in Land Information memorandums and consent notices on all new subdivisions in the rural zones that the site is located in an intensive agricultural and horticultural production area, and detail the type of activities that can be undertaken in that zone. The following wording is suggested: "many intensive agricultural/horticultural production activities are located in the rural area of Marlborough District, where farm management practices, such as the general use of farm machinery on and off-farm, the application of agrichemicals, pumping water for crop irrigation, use of frost fans and bird scarers, and harvesting of crops occur are various times including at night, at weekends, and on public holidays. These practices have the potential to create noise, dust and odour either of a temporary or intermittent nature beyond the boundary of the property concerned."

**Horticulture New Zealand - Participant #: 27 Submission #: 284**

Make consequential amendments as a result of the relief sought for Horticulture NZ's submission

**Relief Sought:** Make consequential changes as a result of the relief sought

**Jenkins, R J & R - Participant #: 49 Submission #: 483**

Oppose the assumptions defined in the attributes and extent of versatile land within the Rural 3 zone. The versatile land does not include eastern and south eastern coastal sections of the



plains, in particular properties adjoining Hardings Rd. This area has undergone subdivision below 8ha because of this low productivity.

**Relief Sought:** Acknowledge the reality that saline affected properties are not in the definition of versatile soils of the Rural 3 zone, and more creative opportunities exist to better utilise these properties.

**Jerram P & A - Participant #: 6 Submission #: 105**

Variation 38 is not a simple document to understand and we believe the public is not best served by its style and presentation. The basic tenets of the variation are flawed. While we accept that there has to be some order to future growth of this area, the variation is a very one-sided look at the future.

The last variation proposed strongly that lifestyle subdivision should be on the southern side of the Wairau Valley, including the Wither Hills. We assume this is still in the Plan. If so it is seriously flawed because water quality and quantity issues cannot be simply addressed.

The term "reverse sensitivity is an elitist term suggesting that one group of peoples values are more important than everyone else's. If "traditional rural people" are abiding by the rules and laws, there is no conflict.

**Relief Sought:** 1. Re-write variation 38 in precise one page document in plain English with the relevant points bullet pointed so everyone can understand its intent and meaning.  
2. Providing high quality subdivision of already small blocks on the northern side of the valley (as discussed elsewhere in the submission) would have no problems with the provision of fresh domestic water.  
3. The 'reverse sensitivity' phrase needs to be removed from the Plan and its variations.

**Landco Limited - Participant #: 22 Submission #: 5665**

The submitter generally supports the provisions and agrees with Councils desire to control the effect of intensification of rural activity.

However the submitter opposes the provisions that seek to establish and operate workers accommodation.

**Relief Sought:** Support

**Mason, Ralph Douglas - Participant #: 216 Submission #: 5404**

**WORKER ACCOMMODATION**

Worker visitor accommodation should be located in townships. The only exceptions should be workers on large pastoral farms. I agree with the Council's reasons.

**ROADING**

Agree with the Council's reasons for increasing the extent of limited access roads.

**NUMBER OF DWELLINGS PER TITLE**

This is a sensible idea. The only exception should be for the larger pastoral and dairy farms that need accommodation usually for a small number.

**Relief Sought:** Support

**New Zealand Defence Force - Participant #: 8 Submission #: 166**

Support stronger policies to manage subdivision within the Rural 3 zone, while retaining the same controlled and non-complying rules (a controlled activity rule allowing new lots greater than 8ha and a non-complying activity rule restricting new lots less than 8ha).

**Relief Sought:** None specified

**New Zealand Winegrowers - Participant #: 39 Submission #: 372**

Viticulture is a valuable district resource and it is appropriate for the variation to acknowledge and provide for this.

Allowing Rural Residential activities in productive areas reduces the availability of this valuable natural resource for future generations and can potentially affect the international reputation of New Zealand wine.

Rural activities take place in rural areas. Where these activities are located adjacent to residential or urban activities, the potential for conflict arises. Providing for Rural Residential activity must be on the basis that it does not lead to unreasonable restrictions on the existing rural activities. NZ Winegrowers supports mechanisms such as buffer zones and no complaints covenants that minimise the potential for conflict at the rural-urban interface.

**Relief Sought:** 1. Adopt the general submission.  
2. Adopt the specific decisions sought by NZ Winegrowers  
3. Such other amendments and relief (including retention of relevant provisions, alternative wording and/or consequential amendments to the variation) as may be required to give effect to this submission.

**Outer Limits Limited - Participant #: 48 Submission #: 478**

**Relief Sought:** Add a new Appendix M that includes all those properties to be in the new business (large format retail) zone to the west of Rose St and north of Middle Renwick Rd.

**Renwick Residents Association - Participant #: 21 Submission #: 184**

Renwick has been provided with a reticulated sewerage scheme and significant development is expected. On that premise, consideration needs to be given for a review of Renwick as a desirable expanding location bound by a set of out of date rules. A urban design study needs to be undertaken so that both residential and commercial development may proceed in a planned and

**Relief Sought:** Undertake urban design study of residential and commercial development in Renwick.

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28  
Submission #: 317**

The enhancement of riparian margins is important to the protection of aquatic habitats, the healthy functioning of the stream and the maintenance of water quality. Variation 38 and the existing rules only recognise the value of riparian margins in a limited way which does not fully meet the requirements of Part II RMA.

Rules controlling vegetation clearance, earthworks, afforestation, and related activities provide the greatest possible certainty that natural character, healthy riparian functioning will be safeguarded. Permanent and undisturbed riparian vegetation can reduce nutrient runoff, protect against sedimentation and adverse effects of land use.

A significant problem is that small streams and drains (under 3m) are considered in the plan as being there mainly for their drainage and flood carrying purposes and emphasis is placed on keeping them weed free. Unfortunately council clears valued trees and plants from the banks as well.

Forest and Bird opposes the reluctance of the council's flood engineers to plant riparian vegetation that would create shade and thus block weed growth. Forest and Bird seeks a robust regulatory approach to ensure that there is no further degradation of riparian margins in the region, that riparian margins are actively restored and enhanced and that the council fulfils its statutory obligations in relation to indigenous biodiversity as well as under part II or the RMA.

**Relief Sought:** Add a new chapter on riparian margins, including new rules, as follows:

Definitions:

"Riparian margin/zone: means a strip of land of varying width adjacent to a water body which contributes to the natural functioning, quality and character of the water body, the land margin, and the ecosystem.

Riparian vegetation: means vegetation on a riparian margin or zone that mitigates adverse effects from the use or development of land adjacent to the margin of the zone.

Water body: means any wetland, permanent body of water or permanently flowing watercourse including open drains or dams."

Objective



"To maintain the margins of all water bodies and coastal water in order to maintain or enhance:

- the natural character of water bodies and their margins;
- indigenous vegetation and biodiversity;
- water quality and flow;
- aquatic and terrestrial habitats;
- the traditional values of tangata whenua, and general public access to waterways;
- the natural landscape."

Policies:

"To maintain and where possible enhance the natural character and natural conservation values of lakes, rivers, wetlands, estuaries and their margins by establishing riparian setbacks for structures, vegetation clearance, land disturbance, earthworks and similar activities close to water bodies and the coast.

To expand the width of the riparian zone to provide additional protection against coastal inundation. In coastal areas, the riparian zone shall be on the landward side of the predicted zone of mean high water springs, allowing for 50 year predicted sea level rise (around 50cm) and 100 year storm effects.

To work closely with landowners, the regional council, the Department of Conservation, tangata whenua, research and community organisations to identify priority areas of riparian protection and enhancement and efforts to ensure the retention and enhancement of the significant nature conservation values of the district's lakes, wetlands and rivers."

Methods of Implementation:

"Method One

The Council will provide information on the benefits of riparian management and promote:

- preservation of the natural character of lakes, rivers, wetlands and their margins; and
- protection and restoration of indigenous riparian vegetation; and
- the control of pest dispersal to and along riparian margins.

Methods Two

Rates rebates will be provided in proportion to the area of any land retired from commercial use. Fencing loans at minimum interest rates will be provided for the exclusion of stock.

Method Three

The Council will register in information schedules, sustainably managed riparian zones established by survey, voluntary retirement, covenant, statute, or the resource consent process."

Riparian rules:

Make activities such as earthworks, vegetation clearance and buildings a non-complying activity in riparian areas by establishing a rule such as that below which establishes riparian setbacks.

"Riparian setbacks:

Any activity which contravenes the following provisions is a non-complying activity on any land:

- within the bed of any lake, river or stream; or
- within any naturally occurring wetland; or
- within 20 metres of any stream with an average bed width of more than 1 metre; or
- within 100 metres of any lake or naturally occurring wetland:
  - a) no earthworks shall exceed 20m<sup>3</sup> (volume) and/or 50m<sup>2</sup> (area) in any continuous period of five years.
  - b) there shall be no clearance of indigenous vegetation.
  - c) clearance of other non-weed vegetation shall not exceed 200m<sup>2</sup> in any continuous period of five years.
  - d) no rubbish or other material shall be dumped.
  - e) no plantation forest or woodlot shall be established.
  - f) no building shall be established.

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28**  
**Submission #: 316**

Given the importance of wetlands to indigenous biodiversity, hazard mitigation, water quality and the healthy functioning of natural systems, Forest and Bird seek a separate chapter on wetlands. This approach has been followed in Canterbury and the West Coast.

Council's reliance on a voluntary approach is disappointing. Forest and Bird seek a robust regulatory approach to ensure there is no further degradation of wetlands and that Council fulfils its statutory obligations. The plan should ensure that the biodiversity and natural productivity of remaining wetlands is enhanced, not further compromised. Council should commission an ecological assessment to identify and list them in the plan. The plan should also provide for and enable remaining wetlands and areas of remnant indigenous vegetation to be linked to provide corridors across the plain. This is an important ecological concept. Wetlands should be linked by streams and drains in a coherent and logical manner rather than some ad hoc approach.

New subdivisions should have a proportion of the land area allocated to the creation of a new wetlands or indigenous revegetation project.

***Relief Sought:*** Add a new chapter on wetlands, including rules, as follows:

New Objective

"To protect and preserve all wetlands in the region, including for their contribution to natural character, landscape, amenity, ecological, recreational and cultural values, water quality, preventing soil erosion and natural hazard mitigation and indigenous biological diversity values."

New policies:

"To recognise and protect wetlands by controlling land drainage, land disturbance, vegetation clearance, water diversion, infilling subdivision and other activities to preserve their natural character, sustain their biodiversity, their contribution to maintaining water quality and other values.

To actively promote the maintenance and protection of wetlands by identifying remaining wetlands and providing advice and assistance to landowners on wetland protection methods (including covenants), assisting where possible with facilitating funding assistance, provide any other assistance as appropriate.

To use rules to control the use and development of wetlands and their margins in order to prevent further decline in the number and extent of natural wetlands and/or deterioration in their ecological condition, natural character, habitat, landscape or other values.

To adopt a cautious approach in decisions affecting wetlands and their margins where there is uncertainty about the likely effects of the activity.

To recognise and promote the importance of restoring native riparian vegetation in the restoration and management of wetlands and native aquatic ecosystems.

To promote indigenous habitat restoration and regeneration and the creation of "indigenous corridors" through the district which link indigenous remnants, wetlands and waterways.

To establish an Environmental Enhancement Fund in cooperation with the district council to provide economic incentives such as rates relief, assistance with fencing, predator control and management to assist private landholders to protect wetlands and other significant natural areas.

Any area meeting one or more of the following criteria will be considered to have wetland values requiring protection from inappropriate use or development:

- contains predominantly indigenous vegetation; or
- is habitat for indigenous fauna; or
- functions as a temporary or permanent watercourse mitigating adverse effects of land use on water quality; or
- functions as a pending area mitigating flood hazard and the effect of land use on water flows;

or

- intercepts ground flows, mitigating adverse water quality effects; or  
- are outstanding natural or landscape features, or important to landscape or ecosystem integrity."

New rules

"1. non-complying rule: activities causing adverse effects (including stock access, earthworks, vegetation disturbance, land drainage, diversion of water, infilling, and subdivision) within wetlands and their margins is a non-complying activity unless allowed under the permitted activity rule."

Or

"Clearance or modification of any natural wetland more than 10 square metres in area which

**Sherwood, Peter F - Participant #: 60 Submission #: 497**

None specified

**Relief Sought:** 1. That all resource management decisions be based on the need to protect, maintain and aid the recovery of Marlborough's natural environment ahead of all other considerations.  
2. That all development be assessed according to the benefits to the community at large, rather than short term profits to individual and corporate developers.  
3. The costs of infrastructure upgrading related to any development be financed by developers, along with the costs of all MDC hearings related to said development.  
4. That strategic planning related to resource management ensure Marlborough has the ability to feed itself and provide basic services in the event we can not longer rely upon longer supply lines e.g. transport costs.  
5. That all large development proposals must meet environment court requirements before that are considered by MDC and have become a burden on Marlborough rate payers.  
6. That where there is any evidence of irreversible environmental effects related to development, consent applications must be declined.  
7. That MDC call a moratorium on issuing consents related to water use until central governments imminent national water strategy is revealed. Also until MDC has an accurate audit and understanding of Marlborough's water resources.

**Taylor Lachlan - Participant #: 18 Submission #: 181**

Amendments to the proposed plan for the Flaxbourne River including first in, first served protection for class II users and a bigger allocation of the river flow for class B & C users i.e. 2 thirds abstraction of river flow instead of 1 third.

An elected officer or councillor should be given the responsibility for simple changes and minor consent approval.

**Relief Sought:** 1. Amend the plan for the Flaxbourne River to provide for first in, first served protection for class II users.  
2. A bigger allocation of the river flow for class B & C users i.e. 2 thirds abstraction of river flow instead of 1 third.  
3. An elected officer or councillor should be given the responsibility for simple changes and minor consent approval.

**Transit New Zealand - Participant #: 24 Submission #: 222**

Consider introducing provisions into the plan that enable financial contributions to be taken for state highway upgrades or the upgrades of access thereto in circumstances where such are required to avoid, remedy or mitigate adverse effects caused by new subdivision or developments.

**Relief Sought:** Add new financial contribution provisions in the plan for state highway upgrades or the upgrades of access thereto.

**Woodlands Marlborough Estate - Participant #: 9 Submission #: 167**

I generally approve of the direction of variation 38.

One area I strongly disagree with is the regulating of farm and vineyard owners to where they can put up accommodation for casual staff. To get consent (for staff accommodation) I signed a paper stating that the accommodation dwelling will not be subdivided off. I found this to be a fair

and reasonable condition.

Council already has too much regulatory authority over property owners.

**Relief Sought:** Allow accommodation for properties over 40ha in size for vineyards, and 100 ha for farms.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6578**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6637**

**Hadley, J A & J P - Participant #: 63 Submission #: 539**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6725**

**Tu Jaes Trust - Participant #: 64 Submission #: 6468**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6711**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6805**

**Wharehunga Trust - Participant #: 70 Submission #: 6910**

The information in variation 38 is insufficient to establish a transparent and well documented process. It is inappropriate to proceed with the variation as policy analysis is inadequate as a basis for sound decision making. The variation reads as a document which has lost its meaning. The variation's development focuses on Rural 3, however it includes marked changes to Rural 4, Rural Residential and urban issues. By changing definitions all parts of the plan are affected. It is inappropriate to have expanded the scope of the variation at this late stage without clearly signalling this to the community and undertaking further consultation.

There is inadequate explanation of the reasons for changes or perceived problems, details of specific situations are not provided, amendments have not been targeted to address adverse effects but to prohibit activities, and cost/benefit analysis is limited.

**Relief Sought:** In the absence of relevant information and adequate community consultation, the variation should be withdrawn.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6576**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6594**

**Hadley, J A & J P - Participant #: 63 Submission #: 596**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6779**

**Tu Jaes Trust - Participant #: 64 Submission #: 6499**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6653**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6801**

**Wharehunga Trust - Participant #: 70 Submission #: 6874**

Where the relief sought in this submission requires additional amendments, then these shall be assumed as additional amendments to achieve the intent even if not individually addressed in this submission.

**Relief Sought:** Where the relief sought in this submission requires additional amendments, then these shall be assumed as additional amendments to achieve the intent even if not individually addressed in this submission.

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

GENERAL

Major issue of compensation has not been addressed to provide compensation for property confiscated e.g. esplanade reserves.

No action should be taken on public access (section 6 RMA) until the government panel review of

property rights is completed.

There has been insufficient consultation with rural residents, in particular those living in Rural 4 area.

Restricting one house per title is inappropriate particularly in Rural 4 where some titles are in excess of 1000ha. This should be the landowner's decision, not Council planners.

**Relief Sought:** 1. Issue of compensation needs to be addressed before any progress can be made planning for Rural 3 & 4.  
2. No action should be taken on public access (section 6 RMA) until the government panel review of property rights is completed.

## **V1-4-Gen - Indigenous Flora & Fauna & their Habitats-General Comments**

### **Peace, Margaret - Participant #: 58 Submission #: 495**

I applaud the amendments proposed to chapter 4 which recognise the importance of indigenous biodiversity. Positive policy decisions to protect and restore indigenous biodiversity need to be followed up by regulations and or incentives.

**Relief Sought:** Support

### **Royal Forest & Bird Protection Society of New Zealand - Participant #: 28 Submission #: 318**

The plan's provisions for section 6(c) matters and council's responsibility for the maintenance of indigenous biodiversity is inadequate and does not implement its statutory function in terms of Part II RMA or council's functions.

**Relief Sought:** Include new provisions for indigenous biodiversity as follows:

New objective:

"To avoid, remedy or mitigate adverse effects on the ecological integrity, functioning, and habitat values and natural character of areas of indigenous vegetation and habitats of indigenous fauna."

New policies:

"To recognise and protect all remaining indigenous vegetation and habitats of indigenous fauna.

To recognise and protect areas with significant nature conservation values on the basis of one or more of the following criteria:

- indigenous biological diversity;
- rarity;
- naturalness;
- representativeness;
- distinctiveness;
- connectedness;
- the area is already protected by statute or covenant;
- the area helps sustain or is habitat for indigenous species which are rare, endangered, threatened, or vulnerable to extinction.

To ensure that earthworks, vegetation clearance, tree planting, viticulture, farming activities, road and rail constructions and maintenance and the establishment of buildings or structures, do not adversely affect areas of indigenous vegetation and habitats of indigenous fauna, the natural character of waterways and their margins, the coast, or water quality.

To recognise and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna from inappropriate use, subdivision and development.

To maintain and enhance the abundance and distribution of native species, their habitats and ecosystems."

New rules:

"Rule 1 - indigenous vegetation clearance

Indigenous vegetation clearance is a permitted activity where it meets the following performance standards:

- clearing indigenous vegetation which is a sub-canopy of an established plantation forest;
- clearing rush in a pasture that is not periodically inundated or is not located within 20 metres of a river;
- clearing fern regrowth in pasture;
- line or spot clearing to develop a plantation of native timber trees in areas of manuka or kanuka which is of any area or height and which is over pasture but which is not located within 20 metres of a river or in an area of severe or extreme erosion risk as identified by the regional council;
- line or spot clearing in fern in any area if the line clearing is to plant native timber species for plantation forestry or conservation management.

Rule 2

Clearance of indigenous vegetation where it does not meet the standards for a permitted

### **V1-4.2.3.ex - Indigenous Flora & Fauna & Their Habitats, 4.2.3 Methods-explanation**

#### **Department of Conservation - Participant #: 229 Submission #: 5431**

Supported. However, this statement infers that wetlands are the only vulnerable community type. This is not the case. The explanation would benefit by adding reference to other important indigenous community types.

**Relief Sought:** Amend the first new paragraph to read: "The coastal and lowland areas in southern Marlborough, which have already been heavily modified, retain areas of significant indigenous vegetation and habitats, such as wetlands, that are particularly vulnerable to removal or further degradation, especially as a result of land conversion and pressures for intensive development.

All remaining natural wetlands in this area are seen as rare and vulnerable, and the council is endeavouring to take all practical steps to protect them."

#### **Royal Forest & Bird Protection Society of New Zealand - Participant #: 28 Submission #: 292**

Support in part.

**Relief Sought:** Retain new paragraph, but add a reference to accordance with the guidelines being an assessment matter for land use consents.

#### **Sherwood, Nancy - Participant #: 61 Submission #: 498**

Steps to protect wetlands should include restrictions on drainage and water diversion, fencing off stock and re-establishing appropriate native vegetation. Large scale proposals need to be included as they negatively impact on streams, springs and wetlands.

**Relief Sought:** 1. Protect wetlands by including restrictions on drainage and water diversion, fencing off stock and re-establishing appropriate native vegetation. 2. Large scale proposals also need to be included as they negatively impact on streams, springs and wetlands.

#### **Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6517**

#### **Hadley Reese Partnership - Participant #: 66 Submission #: 6638**

#### **Hadley, J A & J P - Participant #: 63 Submission #: 541**

#### **J A Hadley Family Trust - Participant #: 68 Submission #: 6724**

#### **Tu Jaes Trust - Participant #: 64 Submission #: 6462**

#### **Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6658**

#### **Wharehunga Forestry Limited - Participant #: 69 Submission #: 6850**

#### **Wharehunga Trust - Participant #: 70 Submission #: 6909**

Reference unclear and location of coastal lowlands in southern Marlborough not specified.

**Relief Sought:** Specify location in the text. Identify lowlands by reference to boundaries or use zone shading in Planning Maps.

### **V1-4.2.3.gd - Indigenous Flora & Fauna & Their Habitats, 4.2.3 Methods-guidelines**

**Department of Conservation - Participant #: 229 Submission #: 5430**

This is supported as a positive means of recognising and providing for RMA part 2 matters.

**Relief Sought:** Retain new method of implementation "guidelines" 4.2.3.

**Haymes, Graeme - Participant #: 231 Submission #: 5462**

Working groups could be disbanded at any time. Guidelines should not form part of the plan. The guidelines were not prepared to be included in the Plan.

**Relief Sought:** Remove guideline.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 14**

The two landscape working groups have no status under the RMA. The working groups can be disbanded at any time. The landscape guidelines (Lucas Associates) is not a statutory document and was prepared for guidance only. The guidelines were not prepared to be included in the Plan. Variation 38 applies to Rural 3 & Rural 4, not just the Wairau Plain.

**Relief Sought:** Remove new method completely.

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28 Submission #: 291**

Support guidelines - Forest and Bird would like to be involved in the landscape working groups. Dividing the landscape into public and private risks an artificial distinction in the landscape. The guideline should be better implemented by inclusion as an appendix to the plan and as an assessment matter for land use consents.

**Relief Sought:** 1. Retain method on guidelines.  
2. Add new method which includes the "Wairau Plain Landscape Concept Guidelines" as an appendix to the Plan, and reference to them in assessment matters for land use consents including subdivision.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6575**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6643**

**Hadley, J A & J P - Participant #: 63 Submission #: 540**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6762**

**Tu Jaes Trust - Participant #: 64 Submission #: 6463**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6655**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6834**

**Wharehunga Trust - Participant #: 70 Submission #: 6913**

It is unclear how the relationship between promoting the guidelines and support of the working groups will achieve the objective. Ensure this method is specific to the Wairau Plain as it appears that the guidelines have been developed for this area only.

**Relief Sought:** Modify wording to clarify method and status of guidelines. Emphasise that guidelines are voluntary on private land and relevant on Wairau Plain only.

### **V1-4.3.3 - Indigenous Flora & Fauna & their Habitats, 4.3.3 Methods- guidelines**

**Department of Conservation - Participant #: 229 Submission #: 7008**

This is supported as a positive means of recognising and providing for RMA part 2 matters.



**Relief Sought:** Retain new method of implementation "guidelines" in 4.3.3

**Haymes, Graeme - Participant #: 231 Submission #: 5463**

Working groups could be disbanded at any time. Guidelines should not form part of the plan. The guidelines were not prepared to be included in the Plan.

**Relief Sought:** Remove guideline.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 15**

The two landscape working groups have no status under the RMA. The working groups can be disbanded at any time. The landscape guidelines (Lucas Associates) is not a statutory document and was prepared for guidance only. The guidelines were not prepared to be included in the Plan. Variation 38 applies to Rural 3 & Rural 4, not just the Wairau Plain.

**Relief Sought:** Remove new method completely.

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28**

**Submission #: 293**

Support guidelines and promoting opportunities to enhance landscape values, biodiversity and

**Relief Sought:** Retain method on guidelines.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6526**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6628**

**Hadley, J A & J P - Participant #: 63 Submission #: 542**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6784**

**Tu Jaes Trust - Participant #: 64 Submission #: 6466**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6661**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6856**

**Wharehunga Trust - Participant #: 70 Submission #: 6922**

It is unclear how the relationship between promoting the guidelines and support of the working groups will achieve the objective. Ensure this method is specific to the Wairau Plain as it appears that the guidelines have been developed for this area only.

**Relief Sought:** Modify wording to clarify method and status of guidelines. Emphasise that guidelines are voluntary on private land and relevant on Wairau Plain only.

## **V1-5-Gen - Landscape-General Comments**

**Ben Morven Partnership - Participant #: 59 Submission #: 6982**

I don't think the council should control landscape. Landscape means different things to different people.

**Relief Sought:** None specified

**Dodson, R C & J W - Participant #: 31 Submission #: 334**

We applaud that council has developed a set of landscape guidelines. We understand and appreciate the concern of the "vineyard monoculture". Landscapes etc. are very personal matters. The monoculture would be generally acceptable. These points must be encouraged and worked on, rather than by regulation and rules.

We accept that the significant natural areas need attention, but will get best results by encouragement.

**Relief Sought:** None specified

**Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 231**

Federated Farmers has no objection to council "landscape guidelines", however should these guidelines be used in a statutory or regulatory way, the federation would strongly oppose.

**Relief Sought:** Ensure that the "landscape guidelines" remain guidelines only, and not use these guidelines in a statutory or regulatory way.



**Horticulture New Zealand - Participant #: 27 Submission #: 277**

Council has referred to landscape guidelines developed to address issues on the Wairau Plains. It is considered that such guidelines remain as guidelines and are not given a regulatory role through the plan change.

*Relief Sought:* Ensure the "landscape guidelines" are retained only as guidelines.

**Peace, Margaret - Participant #: 58 Submission #: 6979**

I applaud the amendments proposed to chapter 5 which recognise the importance of indigenous biodiversity. Positive policy decisions to protect and restore indigenous biodiversity need to be followed up by regulations and or incentives.

*Relief Sought:* Support

**Thomson H J - Participant #: 11 Submission #: 171**

Keep development out of sight from the beach zone or any conservation area or zone. This would mean people could walk on the beach / public land and enjoy the landscape and natural character values.

*Relief Sought:* Keep development out of sight from the beach zone or any conservation area or zone.

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief)**

It is not appropriate for Council to become arbiter of subjective "good taste" through voluntary landscape provisions. Landowners must have the right to express themselves. Costs of landscape provisions have not been addressed.

Relief Sought: None specified

**V1-5.5 - Landscape, 5.5 explanation****N Z Institute of Surveyors - Participant #: 3 Submission #: 17**

There are instances where development may improve the visual amenity values. There is no need to have this paragraph included .

*Relief Sought:* .Remove amendment completely.

**New Zealand Winegrowers - Participant #: 39 Submission #: 374**

NZ Winegrowers supports the amendments in part. It accepts that the development of nodes of settlement can have an adverse impact on visual amenity values.

However, ongoing land use change consistent with rural activities and in accordance with the Plan does not adversely impact on amenity values in the rural areas. Use of rural land for rural productive purposes is an essential part of the character and amenity of the rural zone.

*Relief Sought:* Add the following sentence to the end of the explanatory paragraph: "However, rural activities by their very nature contribute and are an essential part of the character and amenity of the rural zone."

**Sherwood, Nancy - Participant #: 61 Submission #: 499**

Provide more detail in explanation e.g ?

Outstanding examples of monoculture:

-Pinus radiata

-viticulture on flats and, increasingly lowlands.

Visual impact:

Loss of native bush; loss of patchwork of varied land use replaced by monotonous rows;

-Loss of old shelterbelts which took generations to grow and (generations to replace.).

Economic impact:

Lack of diversity in primary production base, exposing the province to economic vulnerability in uncertain times (i.e. climate change; energy crisis; international political situation. A diversified self-

sufficient economy would safeguard us if export market fail.

**Relief Sought:** Provide more detail

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6521**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6636**

**Hadley, J A & J P - Participant #: 63 Submission #: 544**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6742**

**Tu Jaes Trust - Participant #: 64 Submission #: 6461**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6686**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6857**

**Wharehunga Trust - Participant #: 70 Submission #: 6900**

The additional wording indicates that "nodes of settlement" will be viewed as having an adverse impact on visual amenity. Effects will be specific to the development and may in fact be positive.

**Relief Sought:** Replace "can have an adverse impact on visual amenity values" with "may need to mitigate adverse impact on visual amenity values".

### **V1-5.5.2.5 - Landscape, new policy 5.5.2.5**

**Horticulture New Zealand - Participant #: 27 Submission #: 278**

Several parts in chapter 5 and chapter 10 refer to "development" of landscape. In a rural setting landscape is very much as it occurs and is not something which is "developed" in the sense of making it happen. It is considered that the term "development" is inappropriate.

**Relief Sought:** Delete reference to "development of landscape"

**N Z Institute of Surveyors - Participant #: 3 Submission #: 16**

There are already sufficient policies contained within Objective 5.5.2. In any event, Variation 38 involves land beyond the Wairau Plain.

**Relief Sought:** Remove the new policy completely.

**New Zealand Winegrowers - Participant #: 39 Submission #: 373**

Reference to "restoration" is ambiguous and fails to recognise the existing value of the Wairau Plain. Reference to "restoration" is subjective, uncertain, and implies remediation to an established prior standard.

While the "development and enhancement of landscape attributes of the Wairau Plain" is desirable, it should not be promoted or considered as a policy to the detriment of the preservation of the productive and life supporting capacity of the soils.

**Relief Sought:** Amend policy to read: "Promote and support the development and enhancement of landscape attributes of the Wairau Plain while preserving the productive and life supporting attributes of the area".

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28**

**Submission #: 294**

Support in part. "Development" is not qualified so could potentially justify decisions which undermine the landscape character.

**Relief Sought:** Amend policy to read as follows: "Promote and support the restoration and enhancement of the landscape attributes of the Wairau Plain. These attributes include: braided river landscapes and associated landforms, tectonic geological features, indigenous vegetation remnants, rural open space, a variety of land use, shelterbelts, and diverse cropping. Avoid development which compromises these attributes".

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6511**  
**Hadley Reese Partnership - Participant #: 66 Submission #: 6631**  
**Hadley, J A & J P - Participant #: 63 Submission #: 543**  
**J A Hadley Family Trust - Participant #: 68 Submission #: 6744**  
**Tu Jaes Trust - Participant #: 64 Submission #: 6482**  
**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6663**  
**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6860**  
**Wharehunga Trust - Participant #: 70 Submission #: 6904**

The word "restoration" is problematic in a highly modified landscape. Restoration "from what to what"?

**Relief Sought:** Replace "restoration" with "maintenance".

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief)**

This policy is contradictory. Restoration is not possible and adverse effects impossible to define.

The landscape working groups are being given a licence to make a profit at the expense of subdividers and developers. This is unethical.

**Relief Sought:** Delete policy

### **V1-5.6.ex - Landscape, 5.6 explanation**

**N Z Institute of Surveyors - Participant #: 3 Submission #: 19**

The methods of implementation and the following description, adequately covers landscaping issues related to subdivision and development. There seems no need to include the above

**Relief Sought:** Remove the new paragraph completely.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6543**  
**Hadley Reese Partnership - Participant #: 66 Submission #: 6623**  
**Hadley, J A & J P - Participant #: 63 Submission #: 546**  
**J A Hadley Family Trust - Participant #: 68 Submission #: 6753**  
**Tu Jaes Trust - Participant #: 64 Submission #: 6480**  
**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6677**  
**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6833**  
**Wharehunga Trust - Participant #: 70 Submission #: 6924**

**Relief Sought:** 1. Replace "restoration" with "maintenance" and  
2. Replace "is also" with "are also".

### **V1-5.6.gd - Landscape, 5.6 Methods-guidelines**

**Department of Conservation - Participant #: 229 Submission #: 5432**

This is supported. The department notes there is already a "guidelines" method in section 5.6 of the plan and council should clarify whether this will be replaced by the method set out in the

**Relief Sought:** Retain new method of implementation "guidelines" in 5.6.

**Haymes, Graeme - Participant #: 231 Submission #: 5464**

Working groups could be disbanded at any time. Guidelines should not form part of the plan. The guidelines were not prepared to be included in the Plan.

**Relief Sought:** Remove guideline.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 18**

The two landscape working groups have no status under the RMA. The working groups can be disbanded at any time. The landscape guidelines (Lucas Associates) is not a statutory document and was prepared for guidance only. The guidelines were not prepared to be included in the Plan. Variation 38 applies to Rural 3 & Rural 4, not just the Wairau Plain.

The Method of Implementation already indicates that Council will develop landscape guidelines in consultation with major land user groups and in accordance with policies. The guidelines are for information only and have no rule status. There may be several landscape guidelines made available to the public.

**Relief Sought:** Remove the new method completely.

**New Zealand Winegrowers - Participant #: 39 Submission #: 375**

NZ Winegrowers repeat the concerns in relation to chapter 5, issue 5.5, objective 2, new policy 2.5, and the explanation paragraph.

Any reference to or use of, the guidelines referred to should be subject to the preservation and maintenance of the versatile soils for productive uses.

**Relief Sought:** 1. Delete the section concerning the guidelines in its entirety, or in the alternative.  
2. Amend the first sentence by inserting the following phrase after the words "promote opportunities to": "...enhance existing landscape values, biodiversity and habitat while preserving the productive and life supporting attribute of the area".

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28 Submission #: 295**

Support the guidelines.

**Relief Sought:** Support

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6547****Hadley Reese Partnership - Participant #: 66 Submission #: 6619****Hadley, J A & J P - Participant #: 63 Submission #: 545****J A Hadley Family Trust - Participant #: 68 Submission #: 6756****Tu Jaes Trust - Participant #: 64 Submission #: 6476****Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6681****Wharehunga Forestry Limited - Participant #: 69 Submission #: 6829****Wharehunga Trust - Participant #: 70 Submission #: 6896**

"Guidelines" already exist as a method. It is unclear how the relationship between promoting the guidelines and support of the working groups will achieve the objective. Ensure this method is specific to the Wairau Plain as it appears that the guidelines have been developed for this area

**Relief Sought:** 1. Amend or remove existing guidelines.

2. Modify wording to clarify method and status of guidelines. Emphasise that guidelines are voluntary on private land and relevant on Wairau Plain only.

**V1-10-Gen - Natural Character-General Comments****Flaxbourne River Consent Holders Group - Participant #: 16 Submission #: 177**

As a group of Class A water right holders we are concerned at the inconsistencies on the conditions included with our consents. Consent conditions should be the same. All consents should be related to the monitoring site and not to the mismatch of conditions relating to well invert levels. Inconsistency of conditions creates division amongst consent holders & misunderstanding in the community.

**Relief Sought:** Ensure water consent conditions are the same.

**Thomson H J - Participant #: 11 Submission #: 172**

Keep development out of sight from the beach zone or any conservation area or zone. This would mean people could walk on the beach / public land and enjoy the landscape and natural character values.

*Relief sought:* Keep development out of sight from the beach zone or any conservation area or zone.

**V1-10.2.1.9 - Natural Character, new policy 10.2.1.9****Department of Conservation - Participant #: 229 Submission #: 5433**

The department supports this policy.

*Relief Sought:* Retain new policy 1.9.

**E D Townley Limited - Participant #: 85 Submission #: 1137**

Policy 1.9 uses open ended words "restoration, development and enhancement" and "landscape attributes" which attributes are neither explained, nor to what level the restoration development enhancement is to be taken.

*Relief Sought:* Delete proposed policy 1.9.

**Haymes, Graeme - Participant #: 231 Submission #: 5465**

This variation has been extended to include all rural land. Why is this limited to the Wairau Plain?

*Relief Sought:* Consider rewording or delete.

**Horticulture New Zealand - Participant #: 27 Submission #: 279**

Several parts in chapter 5 and chapter 10 refer to "development" of landscape. In a rural setting landscape is very much as it occurs and is not something which is "developed" in the sense of making it happen. It is considered that the term "development" is inappropriate.

*Relief Sought:* Delete reference to "development of landscape"

**Jenkins, R J & R - Participant #: 49 Submission #: 484**

Support policy 1.9. Enhancement of landscape attributes can be achieved by lifestyle properties as a condition of subdivision.

*Relief Sought:* Support

**N Z Institute of Surveyors - Participant #: 3 Submission #: 20**

The Plan states "Protection of visual qualities is provided in the landscape section (Chapter 5), and throughout a number of other sections of the Plan.."

It is inappropriate to include landscape issues under this objective and this is supported by the fact that landscape issues are dealt with elsewhere in the Plan.

*Relief Sought:* Remove new policy completely.

**New Zealand Winegrowers - Participant #: 39 Submission #: 376**

The reference to "restoration" in new policy 1.9 is ambiguous for the reasons given in relation to new policy 2.5. In addition, the phrase "development an enhancement of landscape attributes of the Wairau Plain" should not be promoted or considered as a policy to the detriment of the preservation of the productive and life supporting capacity of the soils.

*Relief Sought:* Amend policy to read: "Promote and support the development and enhancement of landscape attributes of the Wairau Plain while preserving the productive and life supporting attributes of the area."

**Otuwhero Estate Limited - Participant #: 7 Submission #: 111**

Policy 1.9 uses open ended words "restoration, development and enhancement" and "landscape attributes" which attributes are neither explained, nor to what level the restoration development enhancement is to be taken.

*Relief Sought:* Delete proposed policy 1.9.

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28**  
**Submission #: 296**

Support in part. "Development" is not qualified so could potentially justify decisions which undermine the landscape character.

**Relief Sought:** 1. Amend new policy to read as follows: "Promote and support the restoration and enhancement of the remaining indigenous vegetation and natural character of waterways and the landscape attributes of the Wairau Plain. These attributes include: rural open space, a variety of land use, shelterbelts, diverse cropping, and indigenous vegetation remnants. Avoid development which compromises these attributes or adversely affects indigenous vegetation or habitat."

2. Add new policy 1.10 to read as follows: "promote the retention and planting of indigenous vegetation along the margins of streams, rivers, wetlands, lakes and estuaries to preserve and

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6538**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6626**

**Hadley, J A & J P - Participant #: 63 Submission #: 547**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6729**

**Tu Jaes Trust - Participant #: 64 Submission #: 6441**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6673**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6839**

**Wharehunga Trust - Participant #: 70 Submission #: 6933**

**Relief Sought:** Replace "restoration" with "maintenance".

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

This policy is contradictory. Restoration is not possible and adverse effects impossible to define.

The landscape working groups are being given a licence to make a profit at the expense of subdividers and developers. This is unethical.

**Relief Sought:** Delete policy 1.9

## **V1-10.3 - Natural Character, 10.3 Methods**

**Department of Conservation - Participant #: 229 Submission #: 5434**

The department supports the new method, in particular reference to enhancing natural character, biodiversity and habitat.

**Relief Sought:** Retain new method of implementation (guidelines) in 10.3.

**E D Townley Limited - Participant #: 85 Submission #: 1138**

The guidelines are not a statutory document, nor are the two landscape working groups the holders of any resource management status and the proposed new method of implementation is meaningless in terms of the Plan.

**Relief Sought:** Delete proposed new guidelines.

**Haymes, Graeme - Participant #: 231 Submission #: 5466**

Working groups could be disbanded at any time. Guidelines should not form part of the plan. The guidelines were not prepared to be included in the Plan.

**Relief Sought:** Remove.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 21**

Landscape character is already addressed under methods of implementation, which state that,



"When issues involving landscape character arise, suitably qualified professionals will be obtained to give advice". This is sufficient to deal with landscape issues. The two landscape working groups have no status under the RMA. The working groups can be disbanded at any time. The landscape guidelines (Lucas Associates) is not a statutory document and was prepared for guidance only. The guidelines were not prepared to be included in the Plan. Variation 38 applies to Rural 3 & Rural 4, not just the Wairau Plain.

**Relief Sought:** Remove new method completely.

**New Zealand Winegrowers - Participant #: 39 Submission #: 377**

NZ Winegrowers repeat the concern set out in relation to new policy 2.5, the explanation paragraph, and chapter 10 objectives and policies 10.2 and new policy 1.9.

Any reference to or use of, the guidelines referred to should be subject to the preservation and maintenance of the versatile soils for productive uses.

**Relief Sought:** 1. Delete the section concerning the guidelines in its entirety or in the alternative, 2. Amend the first sentence by inserting the following phrase after the words "promote opportunities to": "...enhance existing landscape values, biodiversity and habitat while preserving the productive and life supporting attributes of the area."

**Otuwhero Estate Limited - Participant #: 7 Submission #: 112**

The guidelines are not a statutory document, nor are the two landscape working groups the holders of any resource management status and the proposed new method of implementation is meaningless in terms of the Plan.

**Relief Sought:** Delete proposed insertion

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28**

**Submission #: 297**

Support.

**Relief Sought:** Support

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6532**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6651**

**Hadley, J A & J P - Participant #: 63 Submission #: 548**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6728**

**Tu Jaes Trust - Participant #: 64 Submission #: 6445**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6671**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6843**

**Wharehunga Trust - Participant #: 70 Submission #: 6929**

It is unclear how the relationship between promoting the guidelines and support of the working groups will achieve the objective. Ensure this method is specific to the Wairau Plain as it appears that the guidelines have been developed for this area only.

**Relief Sought:** Modify wording to clarify method and status of guidelines. Emphasise that guidelines are voluntary on private land and relevant on Wairau Plain only.

## **V1-11.1 - Urban Environments, Introduction 11.1**

**N Z Institute of Surveyors - Participant #: 3 Submission #: 22**

The inclusion of this paragraph is unnecessary as it is stating a legal process. It is possible a further review could occur within the time-frame of the Plan. Although Marlborough is experiencing unprecedented growth pressures, this is not always going to be the case.

**Relief Sought:** Remove new paragraph completely.

**Outer Limits Limited - Participant #: 48 Submission #: 459**

It is essential that industrial and commercial rezoning take place as the urgent demand for such land has to be met now. It is not possible to wait for the V41 process as the required outcome cannot be guaranteed at this stage.

**Relief Sought:** Add the following at the end of the paragraph: "Provision should be made immediately to accommodate the pressure for more industrial and commercial (large format retail) activities, including appropriately located land near Springlands."

**V1-11.2.2.1 - Urban Environments, objective 11.2.2.1****Clintondale Trust - Participant #: 23 Submission #: 187**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Amend objective 1 to read: "The maintenance and creation of residential environments which provide for the existing and future needs of the community whilst preserving primary production potential."

**New Zealand Winegrowers - Participant #: 39 Submission #: 378**

NZ Winegrowers support the replacement of objective 1 and agrees that it is appropriate that the urban environment provide for the existing and future needs of the community. However, this objective should also provide that the productive potential of the versatile soils is preserved.

**Relief Sought:** Replace objective 1 as proposed, and amend by adding the following words to the end of the sentence: "...whilst preserving the primary productive potential of versatile soils."

**Outer Limits Limited - Participant #: 48 Submission #: 460**

It is necessary to clearly indicate and provide for the need for further industrial and commercial land on the fringes now.

**Relief Sought:** Amend objective 1 to read: "The maintenance and creation of residential, industrial and business environments that provide for the existing and future needs of the community. This will involve a process of zone provisions immediately on the urban fringes to accommodate a significant demand for both industrial and commercial (large format retail) activity. This will also enable resource consent applications that achieve the same purpose to be appropriately

**V1-11.2.2.1.5 - Urban Environments, new policy 11.2.2.1.5****E D Townley Limited - Participant #: 85 Submission #: 1139**

The guidelines are not a statutory document, nor are the two landscape working groups the holders of any resource management status and the proposed new method of implementation is meaningless in terms of the Plan.

**Relief Sought:**

1. Define the words "versatile land" both as to meaning and extent, and for consistency;
2. Identify what part of the "Wairau Plain" in the policy and planning maps by zoning Rural 3.



**E D Townley Limited - Participant #: 85 Submission #: 1140**

The policy uses the words "urban limits" - those words are not defined in the Plan and there is therefore uncertainty as to their meaning or extent.

**Relief Sought:** 1. Amend policy to refer to "Residential zonings" rather than "urban limits".  
2. Or at the very least Residential zonings should be identified by reference to the planning

**Marris, John & Alison - Participant #: 234 Submission #: 5505**

Support policy and explanation. This will ensure more appropriate consideration to the relationship between rural and urban environments. It will ensure that urban development within the district occurs in a compact sustainable manner.

**Relief Sought:** Accept the proposed amendments.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 23**

It is impossible to achieve the maintenance of rural character and amenity values and versatile land if the urban limits are being extended. The policy is unclear as urban limits is not defined. The policy as it reads effectively makes it impossible to expand the present urban limits.

A common problem with Variation 38 is that Council has rushed the release of the Variation on the back of work carried out in the Rural 3 zone, but chose to extend the Variation to include Rural 4. This includes other significant settlements, such as Seddon and Ward, and possibly there are other townships such as Spring Creek and Grovetown that could have been included within this policy. Insufficient research and consultation has been carried out to allow for the inclusion of these towns in this policy.

**Relief Sought:** Possible new policy wording could read, "Any residential or Rural Residential expansion of Blenheim and Renwick".

**New Zealand Winegrowers - Participant #: 39 Submission #: 379**

NZ Winegrowers supports new policy 1.5 insofar as it expressly provides for the maintenance and enhancement of the versatile land of the Wairau Plain. However, it submits that versatility should be directly related to the ability of the Wairau Plain to support productive rural activities.

**Relief Sought:** Amend policy by amending the last bullet point at the end of the policy to read: "maintain and enhance the versatile and productive land of the Wairau Plain."

**NZ Automobile Association Incorporated - Participant #: 240 Submission #:**

Support in particular retention of the integrity of the road network.

**Relief Sought:** Support

**Otuwhero Estate Limited - Participant #: 7 Submission #: 114**

The policy uses the words "urban limits" - those words are not defined in the Plan and there is therefore uncertainty as to their meaning or extent.

**Relief Sought:** 1. Amend policy to refer to "Residential zonings" rather than "urban limits".  
2. Or at the very least Residential zonings should be identified by reference to the planning

**Otuwhero Estate Limited - Participant #: 7 Submission #: 113**

Reference is made to "versatile land in the Wairau Plain" and in various parts of the Plan document a distinction is made between "the Wairau Plain" and the "lower Wairau Plain".

**Relief Sought:** 1. Define the words "versatile land" both as to meaning and extent, and for consistency;  
2. Identify what part of the "Wairau Plain" in the policy and planning maps by zoning Rural 3.

**Outer Limits Limited - Participant #: 48 Submission #: 461**

Such land in good locations adjacent to services and roading networks is appropriate for business park environments.

**Relief Sought:** Add the following new bullet point  
"- development where appropriate infrastructure and traffic issues can be properly mitigated and managed safely."

**Sherwood, Nancy - Participant #: 61 Submission #: 500**

Ever increasing encroachment of residential, industrial, commercial and viticulture development on prime horticultural land is a concern. The soils and benign climate are not reproduced elsewhere.

**Relief Sought:** None specified

**Transit New Zealand - Participant #: 24 Submission #: 209**

Transit supports policy emphasising compact urban form and integrity of the road network.

Transit supports additions to the explanation emphasising a planned and comprehensive approach to expansion of urban development through plan change process rather than through piecemeal development.

**Relief Sought:** Support

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6530****Hadley Reese Partnership - Participant #: 66 Submission #: 6652****Hadley, J A & J P - Participant #: 63 Submission #: 549****J A Hadley Family Trust - Participant #: 68 Submission #: 6733****Tu Jaes Trust - Participant #: 64 Submission #: 6447****Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6667****Wharehunga Forestry Limited - Participant #: 69 Submission #: 6841****Wharehunga Trust - Participant #: 70 Submission #: 6925**

"Urban limits" is not defined. "Versatile land" is not defined or identified. Policy has the potential to prevent all expansion past existing urban environment.

**Relief Sought:** Clarify definitions and reconsider scope of policy 1.5 to allow for sustainable development.

**V1-11.2.2.1ex2 - Urban Environments, 11.2.2.1, new explanation****E D Townley Limited - Participant #: 85 Submission #: 1141**

The words used are "expansion of the urban limits" - it is unclear from the Plan and its context as to whether that includes "infill" subdivision extension of the outer boundaries of the residential / urban zonings.

**Relief Sought:** 1. Clarify that "infill" is excluded.

2. Define what is meant by "urban limits" or refer to Residential zonings.

**Jenkins, R J & R - Participant #: 49 Submission #: 485**

Support the explanation

**Relief Sought:** There is opportunity to conserve highly versatile soils by allowing growth pressures to develop on poor soils.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 24**

This paragraph seems to suggest that only the plan change method is available for managing the relationship between the urban and rural zonings. Historically developers promote subdivision and development, and have used the resource consent process, together with the plan change option.

Many of the terms used lack definition.

**Relief Sought:** Remove new paragraph completely.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 115**

The words used are "expansion of the urban limits" - it is unclear from the Plan and its context as to whether that includes "infill" subdivision extension of the outer boundaries of the residential / urban zonings.

- Relief Sought:** 1. Clarify that "infill" is excluded.
2. Define what is meant by "urban limits" or refer to Residential zonings.

**Outer Limits Limited - Participant #: 48 Submission #: 462**

It is important to give clearer direction to accommodate growth in appropriate locations. The north-western sector is still the optimum location for expansion.

**Relief Sought:** Amend explanation to read: "The future expansion of Blenheim for residential, industrial and business activity shall be comprehensively zoned into those areas on the periphery where they can be sustainably managed. This will involve the provision of efficient infrastructure, energy conservation, high levels of amenity, and wherever appropriate having regard to other community demands and needs, the maintenance of rural productive potential and character. An immediate zoning by way of this variation 38 is required to provide for large format retail activity in appropriate locations on the fringe. A resource consent application that achieves the same purpose should also be enabled."

**Sherwood, Nancy - Participant #: 61 Submission #: 6985**

Any expansion of Blenheim and Renwick need to be considered in a holistic manner.

Green buffer zones need to be included at the interface of urban/rural zones.

**Relief Sought:** Green buffer zones need to be included at the interface of urban/rural zones.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6540**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6629**

**Hadley, J A & J P - Participant #: 63 Submission #: 550**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6783**

**Tu Jaes Trust - Participant #: 64 Submission #: 6440**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6682**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6846**

**Wharehunga Trust - Participant #: 70 Submission #: 6903**

Does "holistic manner" mean by way of plan change? As land is finite, "retention" of the versatile land as "rural" will not be possible if urban environmental expands.

**Relief Sought:** Clarify meaning and intent.

## **V1-11.2.3.ex - Urban Environments, 11.2.3 Methods -explanation**

**E D Townley Limited - Participant #: 85 Submission #: 1145**

The new paragraph wipes out application of resource consent & elevates development, particularly infill development, to a status requiring plan change. Furthermore, the provision is unclear as it refers to activity changes by density changes which are "beyond the scope of an existing zone". The net effect is to choke development and require plan changes only.

**Relief Sought:** Delete the provisions

**N Z Institute of Surveyors - Participant #: 3 Submission #: 29**

Wording of this paragraph is very unclear and impractical. It could result in simple discretionary and non-complying subdivisions in the Urban Zone or Rural Zone being unable to be processed unless the plan change process is used. Having flexibility relating to planning issues has been extremely important in allowing the province to grow and it is wrong to suggest that this growth has been completely unmanaged.

**Relief Sought:** Remove new paragraph completely.

**New Zealand Winegrowers - Participant #: 39 Submission #: 383**

NZ Winegrowers supports the inclusion of an explanatory paragraph that provides for a

comprehensive approach to expansion of the urban zones through the plan change process. However, it submits that, at all times, the productive capacity of the soils of the Wairau Plain must be maintained.

**Relief Sought:** Add the following to the new paragraph: "Any expansion of urban development in the rural zone must maintain and protect the productive capacity of the soils of the Wairau Plain."

**NZ Automobile Association Incorporated - Participant #: 240 Submission #:**  
Support

**Relief Sought:** Support

**Otuwhero Estate Limited - Participant #: 7 Submission #: 119**

The new paragraph wipes out application of resource consent & elevates development, particularly infill development, to a status requiring plan change. Furthermore, the provision is unclear as it refers to activity changes by density changes which are "beyond the scope of an existing zone". The net effect is to choke development and require plan changes only.

**Relief Sought:** Delete the provisions

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6520**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6606**

**Hadley, J A & J P - Participant #: 63 Submission #: 553**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6786**

**Tu Jaes Trust - Participant #: 64 Submission #: 6507**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6687**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6847**

**Wharehunga Trust - Participant #: 70 Submission #: 6866**

Plan changes are expensive and slow. The Plan is still not operative creating further delays. Removing opportunities for resource consent applications creates an inflexible use of resources and an inability to adapt to need in a timely manner.

**Relief Sought:** Allow for resource consent applications and assess on individual merits and in terms of their effects. Delete.

### **V1-11.2.3.pc - Urban Environments, 11.2.3 Methods-Plan Changes**

**E D Townley Limited - Participant #: 85 Submission #: 1144**

Plan changes are an expensive time consuming and long winded process - effectiveness and efficiency should not preclude the resource consent procedures, especially since private plan changes can not be made until after a plan is operative.

**Relief Sought:** Include resource consent application as a process for expansion of Residential / Rural Residential activity into rural zones also retain the plan change process for "new localities".

**Marris, John & Alison - Participant #: 234 Submission #: 5521**

**Relief Sought:** 1. Amend new method to read: "New localities for urban/township expansion in less versatile rural zones be considered through plan change procedures."

2. Make other consequential amendments to give effect to the changes sought.

**Monk, Craig & Jo - Participant #: 72 Submission #: 1009**

Oppose this change as it is not appropriate.

**Relief Sought:** Carry out by the normal resource consent procedure.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 28**

This method is inappropriate and not in line with the provisions of the RMA. Plan change procedures, together with resource consent procedures, are included in the Act and these processes are available for developers and Council and there should be no restrictions as

**Relief Sought:** Remove the new method completely.

**New Zealand Winegrowers - Participant #: 39 Submission #: 383**

NZ Winegrowers supports the inclusion of a new method of implementation which provides that plan change procedures are the appropriate method for dealing with potential urban/township expansion into rural zone. However, it submits that at all times, the productive capacity of the soils of the Wairau Plain must be maintained.

**Relief Sought:** Add the following to the end of the sentence: "...while taking into account the need to protect the existing productive and life supporting capacity of the soils of the Wairau Plain."

**NZ Automobile Association Incorporated - Participant #: 240 Submission #:**

Support.

**Relief Sought:** Support

**Otuwhero Estate Limited - Participant #: 7 Submission #: 118**

Plan changes are an expensive time consuming and long winded process - effectiveness and efficiency should not preclude the resource consent procedures, especially since private plan changes can not be made until after a plan is operative.

**Relief Sought:** Include resource consent application as a process for expansion of Residential / Rural Residential activity into rural zones also retain the plan change process for "new localities".

**Outer Limits Limited - Participant #: 48 Submission #: 466**

The unmet demand has to be catered for now through the variation or resource consent process as time is of the essence.

**Relief Sought:** Add new sentence to 11.2.3 as follows: "This first such variation or resource consent application indicates the new Business (large format retail) development to be applied to the land west of Rose St.

**Williams, Peter & Dianne - Participant #: 71 Submission #: 1005**

Oppose this change as it is not appropriate.

**Relief Sought:** Carry out by the normal resource consent procedure.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6523****Hadley Reese Partnership - Participant #: 66 Submission #: 6596****Hadley, J A & J P - Participant #: 63 Submission #: 552****J A Hadley Family Trust - Participant #: 68 Submission #: 6790****Tu Jaes Trust - Participant #: 64 Submission #: 6449****Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6672****Wharehunga Forestry Limited - Participant #: 69 Submission #: 6851****Wharehunga Trust - Participant #: 70 Submission #: 6916**

Plan changes are expensive and slow. The Plan is still not operative creating further delays. Removing opportunities for resource consent applications creates an inflexible use of resources and an inability to adapt to need in a timely manner.

**Relief Sought:** Allow for resource consent applications and assess on individual merits and in terms of their effects. Delete.

### V1-11.2.3.z - Urban Environments, 11.2.3 Methods-Zoning

#### **E D Townley Limited - Participant #: 85 Submission #: 1143**

The overlay proposed is intended to identify where future development will take place and the method explains "the overlay will signal a deferred Urban Residential 2 status for this area of land".

Either a zoning is deferred or it is not - it is not appropriate to deal with the matter by way of overlay

**Relief Sought:** Rezone land in the vicinity of Bary St and Camerons and Doctors Creeks, and bounded by Battys Rd, David St and Severne St to Urban Residential 2, but defer such zoning until whatever it is which has led to the deferment (appears to be stormwater) is in place.

#### **N Z Institute of Surveyors - Participant #: 3 Submission #: 27**

It is inappropriate to have an overlay over planning maps signalling a deferred Urban Residential 2 status for land. The land bounded by Battys Road, David St and Severne St should be zoned Urban Residential 2, with deferred status being recorded. The reason for the deferred status should be included i.e. satisfactory stormwater reticulation.

**Relief Sought:** Rephrase the paragraph to state: "The area of land in the vicinity of Bary Street and Camerons and Doctors Creeks, and bounded by Battys Rd, David St and Severne St, is to be zoned Urban Residential 2 "Deferred" until satisfactory stormwater reticulation is available."

#### **Otuwhero Estate Limited - Participant #: 7 Submission #: 117**

The overlay proposed is intended to identify where future development will take place and the method explains "the overlay will signal a deferred Urban Residential 2 status for this area of land".

Either a zoning is deferred or it is not - it is not appropriate to deal with the matter by way of overlay

**Relief Sought:** Rezone land in the vicinity of Bary St and Camerons and Doctors Creeks, and bounded by Battys Rd, David St and Severne St to Urban Residential 2, but defer such zoning until whatever it is which has led to the deferment (appears to be stormwater) is in place.

### V1-11.4.3.ex - Urban Environments, 11.4.3 Methods, explanation

#### **N Z Institute of Surveyors - Participant #: 3 Submission #: 31**

This paragraph is the same as the paragraph addressed in 11.2.3 Methods-explanation

**Relief Sought:** Remove the new paragraph completely.

#### **New Zealand Winegrowers - Participant #: 39 Submission #: 385**

NZ Winegrowers supports the inclusion of a new method of implementation which provides that plan change procedures are the appropriate method for dealing with urban/township expansion into rural zones. However, it submits that at all times, the productive capacity of the soils of the Wairau Plain must be maintained.

**Relief Sought:** Add the following sentence to the end of the paragraph: "Any expansion of urban development into the rural zone must maintain and protect the productive capacity of the soils of the Wairau Plain."

#### **NZ Automobile Association Incorporated - Participant #: 240 Submission #:**

Support

**Relief Sought:** Support



**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6529**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6616**

**Hadley, J A & J P - Participant #: 63 Submission #: 555**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6763**

**Tu Jaes Trust - Participant #: 64 Submission #: 6491**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6674**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6845**

**Wharehunga Trust - Participant #: 70 Submission #: 6891**

Plan changes are expensive and slow. The Plan is still not operative creating further delays. Removing opportunities for resource consent applications creates an inflexible use of resources and an inability to adapt to need in a timely manner.

**Relief Sought:** Allow for resource consent applications and assess on individual merits and in terms of their effects. Delete.

### **V1-11.4.3.pc - Urban Environments, 11.4.3 Methods -Plan Changes**

**Marris, John & Alison - Participant #: 234 Submission #: 5522**

**Relief Sought:** 1. Amend new method to read: "New localities for urban/township expansion in less versatile rural zones be considered through plan change procedures."

2. Make other consequential amendments to give effect to the changes sought.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 30**

This is the same as 11.2.3 Methods-Plan Change

**Relief Sought:** Remove the new method completely.

**New Zealand Winegrowers - Participant #: 39 Submission #: 384**

NZ Winegrowers supports the inclusion of a new method of implementation which provides that plan change procedures are the appropriate method for dealing with urban/township expansion into rural zones. However, it submits that at all times, the productive capacity of the soils of the Wairau Plain must be maintained.

**Relief Sought:** Add the following to the end of the sentence: "...while taking into account the need to protect the existing productive and life supporting capacity of the soils of the Wairau Plain."

**NZ Automobile Association Incorporated - Participant #: 240 Submission #:**

Support

**Relief Sought:** Support

**Outer Limits Limited - Participant #: 48 Submission #: 467**

The unmet demand has to be accommodated now as part of the variation process.

**Relief Sought:** Add the following sentence to 11.4.3 methods: "The first such variation or resource consent application indicates the new business (large format retail) development to be applied to the land west of Rose St."

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6536**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6610**

**Hadley, J A & J P - Participant #: 63 Submission #: 554**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6759**

**Tu Jaes Trust - Participant #: 64 Submission #: 6505**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6678**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6826**

**Wharehunga Trust - Participant #: 70 Submission #: 6870**

Plan changes are expensive and slow. The Plan is still not operative creating further delays. Removing opportunities for resource consent applications creates an inflexible use of resources and an inability to adapt to need in a timely manner.

**Relief Sought:** Allow for resource consent applications and assess on individual merits and in terms of their effects. Delete.

### **V1-11.5.3.ex - Urban Environments, 11.5.3 Methods, explanation**

**N Z Institute of Surveyors - Participant #: 3 Submission #: 33**

This paragraph is the same as 11.2.3 Methods, explanations and 11.4.3 Methods, explanations

**Relief Sought:** Remove new paragraph completely.

**New Zealand Winegrowers - Participant #: 39 Submission #: 387**

NZ Winegrowers supports the inclusion of a new method which provides that plan change procedures are the appropriate method for dealing with urban/township expansion into rural zones.

However, it submits that at all times, the productive capacity of the soils of the Wairau Plain must

**Relief Sought:** Add the following sentence to the end of the paragraph: "Any expansion of urban development into the rural zone must maintain and protect the productive capacity of the soils of the Wairau Plain."

**NZ Automobile Association Incorporated - Participant #: 240 Submission #:**

support

**Relief Sought:** Support

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6545**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6599**

**Hadley, J A & J P - Participant #: 63 Submission #: 557**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6758**

**Tu Jaes Trust - Participant #: 64 Submission #: 6502**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6656**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6830**

**Wharehunga Trust - Participant #: 70 Submission #: 6873**

Plan changes are expensive and slow. The Plan is still not operative creating further delays. Removing opportunities for resource consent applications creates an inflexible use of resources and an inability to adapt to need in a timely manner.

**Relief Sought:** Allow for resource consent applications and assess on individual merits and in terms of their effects. Delete.



## V1-11.5.3.pc - Urban Environments, 11.5.3 Methods-Plan Changes

**Marris, John & Alison - Participant #: 234 Submission #: 5523**

**Relief Sought:** 1. Amend new method to read: "New localities for urban/township expansion in less versatile rural zones be considered through plan change procedures."

2. Make other consequential amendments to give effect to the changes sought.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 32**

This new method is the same as 11.2.3 Methods-Plan Change. The resource consent procedure must still be available for expansion to occur. Not all expansion is of a large nature requiring the slow and expensive process of a plan change. Conditions often can be more creative when considering an application by way of resource consent. The RMA allows for such procedures and the Council should not be limiting the opportunities presented by the RMA.

**Relief Sought:** Remove new method completely.

**New Zealand Winegrowers - Participant #: 39 Submission #: 386**

NZ Winegrowers supports the inclusion of a new method which provides that plan change procedures are the appropriate method for dealing with urban/township expansion into rural zones.

However, it submits that at all times, the productive capacity of the soils of the Wairau Plain must

**Relief Sought:** Add the following to the end of the sentence: "...while taking into account the need to protect the existing productive and life supporting capacity of the soils of the Wairau Plain."

**NZ Automobile Association Incorporated - Participant #: 240 Submission #:**

Support

**Relief Sought:** Support

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6528**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6602**

**Hadley, J A & J P - Participant #: 63 Submission #: 556**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6766**

**Tu Jaes Trust - Participant #: 64 Submission #: 6487**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6685**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6835**

**Wharehunga Trust - Participant #: 70 Submission #: 6882**

Plan changes are expensive and slow. The Plan is still not operative creating further delays. Removing opportunities for resource consent applications creates an inflexible use of resources and an inability to adapt to need in a timely manner.

**Relief Sought:** Allow for resource consent applications and assess on individual merits and in terms of their effects. Delete.

## V1-11-2.2.2.7 - Urban Environments, new policy 11.2.2.2.7

**Marris, John & Alison - Participant #: 234 Submission #: 5506**

Support policy as this policy protects flood sensitive areas within the plain.

**Relief Sought:** Accept the proposed amendments.

**Outer Limits Limited - Participant #: 48 Submission #: 463**

There is no real justification provided, as there should be for the Rose St rezoning to residential. It needs some justification.

**Relief Sought:** Add the following new policy: "2.8 - Identify locations in the rural zone on the Blenheim periphery that have become urban in character and that are appropriate for residential and/or business activity, which can be developed as logical extensions to the urban area to meet the demands for industrial and business activity."

### **V1-11-2.2.2.ex1 - Urban Environments, 11.2.2.2, new explanation**

#### **N Z Institute of Surveyors - Participant #: 3 Submission #: 25**

Wording of the paragraph is too specific and needs to be broadened.

**Relief Sought:** Replace the paragraph with: "Council will actively pursue the identification of areas for residential development on the perimeter of townships".

#### **New Zealand Winegrowers - Participant #: 39 Submission #: 380**

NZ Winegrowers agrees that the interface between the urban peripheries and the rural areas must be sustainably managed. However, in order for people and communities to provide for their social and economic wellbeing, the existing productive capacity of the soils of the Wairau Plain must be maintained.

**Relief Sought:** Add the following to the end of the explanatory paragraph: "...taking into account the existing productive capacity of the Wairau Plain."

#### **Outer Limits Limited - Participant #: 48 Submission #: 464**

It is necessary to provide justification for the rezoning of Rose St.

**Relief Sought:** Add the following new explanation statements: "The area of Rural 3 land immediately adjacent to Rose St on its western side is residential in character, and could be developed for residential purposes along the Rose St frontage. The land immediately adjacent to Rose St further to the west is in the same ownership, and has been comprehensively planned to accommodate expansion of business (large format retail) development. This development can be carried out in a manner that maintains an appropriate urban-rural interface.

It is proposed to zone this land as Business (Large Format Retail ) zone, in accordance with a Master Plan which has details of building locations, building setbacks and amenity areas, parking areas, access roads within and through the land, landscaping treatment, drainage ponds and overflow paths. Resource consents that achieve the same purpose will also be accepted."

### **V1-11-2.2.2.ex2 - Urban Environments, 11.2.2.2, explanation**

#### **E D Townley Limited - Participant #: 85 Submission #: 1142**

The expected change does not refer to "infill" nor does it identify or cater for items such as Appendix H1 in the existing plan. The variation in effect excludes resource consent applications as a planning tool and creates a priority for zoning.

**Relief Sought:** 1. Dilute the proposed explanation to make it clear that zoning is by plan changes only one tool.

2. Identify resource consents application as an appropriate method also, and in particular cater

#### **Jenkins, R J & R - Participant #: 49 Submission #: 486**

Oppose. The planning process as suggested has been inadequate to accommodate scientific evidence as to the extent of versatile land and identify marginal land where development would have minimal impact..

**Relief Sought:** Replace the explanation with the following: "In considering areas for future residential development, the versatile soils of the Wairau Plains need to be recognised and protected for long term sustainability. However, it also needs to be recognised that expansion of urban areas may inevitably need to be accommodated, preferably on marginal land wherever possible, where it adjoins existing towns/townships."

#### **N Z Institute of Surveyors - Participant #: 3 Submission #: 26**

It is extremely unwise to limit the processing of subdivisions for residential developments to only

the plan change process. Process of granting resource consents should be maintained. A plan change is unnecessary for small scale infill subdivisions or small residential developments. The plan change process is an extremely long and expensive process to be followed, and for private plan changes to occur the Plan needs to be operative. The removal of the ability for Council to process resource consents applications may have a serious effect on the development of the

**Relief Sought:** Reword the paragraph to state: "Where this growth is to occur, it may be promoted either as a plan change, or be considered by way of a resource consent application."

**New Zealand Winegrowers - Participant #: 39 Submission #: 381**

It is contrary to the effects-based regime under the RMA for the variation to recognise that "expansion of urban areas may inevitably need to be accommodated on this versatile land", without at the same time recognising the importance of the productive capacity of that land.

The productive capacity of the Wairau Plain is significant on a national basis. Protecting the productive capacity of soils in the rural zone is intrinsic to maintaining New Zealand's international reputation for the wine it produces. Any urban expansion into the rural zone needs to be carefully considered in light of the need to maintain and protect the productive capacity of the Wairau Plain.

**Relief Sought:** Amend the second sentence in the explanatory paragraph to read: "Any expansion of urban areas onto this versatile land, where it immediately adjoins existing towns / townships, needs to be carefully considered and balanced with need to be maintain and protect the productive soils of the Wairau Plain."

**Otuwhero Estate Limited - Participant #: 7 Submission #: 116**

The expected change does not refer to "infill" nor does it identify or cater for items such as Appendix H1 in the existing plan. The variation in effect excludes resource consent applications as a planning tool and creates a priority for zoning.

**Relief Sought:** 1. Dilute the proposed explanation to make it clear that zoning is by plan changes only one tool.

2. Identify resource consents application as an appropriate method also, and in particular cater

**Outer Limits Limited - Participant #: 48 Submission #: 465**

Land has to be made available for industrial and commercial activities now.

**Relief Sought:** Add the following to the end of the explanation: "Immediate zonings will accommodate the unmet demand for new industrial and business zoned land, particularly for large format retail developments that cannot be catered for in the present town zonings. Resource consents that achieve the same purpose will also be accommodated."

**Sherwood, Nancy - Participant #: 61 Submission #: 6986**

The versatility of land does need to be protected and other models of higher density residential housing need to be explored.

**Relief Sought:** 1. Support protection of the versatile lands.  
2. Other models of higher density residential housing needs to be explored.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6512**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6592**

**Hadley, J A & J P - Participant #: 63 Submission #: 551**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6787**

**Tu Jaes Trust - Participant #: 64 Submission #: 6456**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6668**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6864**

**Wharehunga Trust - Participant #: 70 Submission #: 6920**

Plan changes are expensive and slow. The plan is still not operative creating further delays. Removing opportunities for resource consent applications creates an inflexible use of resources and an inability to adapt to need in a timely manner.

**Relief Sought:** Allow for resource consent applications and assess on individual merits and in terms of their effects. Delete.

## **V1-12-Gen - Rural Environments-General Comments**

**Weyerhaeuser New Zealand Limited - Participant #: 84 Submission**  
WNZI supports variations.

**Relief Sought:** Support

**Weyerhaeuser New Zealand Limited - Participant #: 84 Submission**  
WNZI supports proposed changes to the issues section.

**Relief Sought:** Support

## **V1-12.1 - Rural Environments, 12.1, Introduction**

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6515**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6612**

**Hadley, J A & J P - Participant #: 63 Submission #: 558**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6773**

**Tu Jaes Trust - Participant #: 64 Submission #: 6495**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6660**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6861**

**Wharehunga Trust - Participant #: 70 Submission #: 6880**

Wording is confusing- reference made to "Wairau Plain" being Rural 3 zoning and "versatile land of Wairau Plain" being Rural 3 Zoning.

**Relief Sought:** Confirm that all of the Wairau Plain is represented by Rural 3 zoning. Use planning map colours or hatching as reference.

## **V1-12.1.bp - Rural Environments, 12.1, amended bullet point.**

**E D Townley Limited - Participant #: 85 Submission #: 1146**

This proposed variation is confusing - in one place it refers to "the Wairau Plain" (being the lower Wairau Valley) which would appear to include Rural 3 and Rural 4 zones, and then refers to "versatile land" (not defined) as being represented by Rural 3 zoning. In effect the nature of the change will be to extend a draconian control not only over the Rural 3 zone, but over the Rural 4

**Relief Sought:** Identify the Wairau Plain as being the area zoned Rural 3 and differentiate between the lower Wairau Plain and the other parts by the planning maps.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 120**

This proposed variation is confusing - in one place it refers to "the Wairau Plain" (being the lower Wairau Valley) which would appear to include Rural 3 and Rural 4 zones, and then refers to "versatile land" (not defined) as being represented by Rural 3 zoning. In effect the nature of the change will be to extend a draconian control not only over the Rural 3 zone, but over the Rural 4

**Relief Sought:** Identify the Wairau Plain as being the area zoned Rural 3 and differentiate between the lower Wairau Plain and the other parts by the planning maps.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6519**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6582**

**Hadley, J A & J P - Participant #: 63 Submission #: 559**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6777**

**Tu Jaes Trust - Participant #: 64 Submission #: 6497**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6662**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6853**

**Wharehunga Trust - Participant #: 70 Submission #: 6876**

Wording is confusing- reference made to "Wairau Plain" being Rural 3 zoning and "versatile land of Wairau Plain" being Rural 3 Zoning.

**Relief Sought:** Confirm that all of the Wairau Plain is represented by Rural 3 zoning. Use planning map colours or hatching as reference.

### **V1-12.2.1.1 - Rural Environments, 12.2.1.1 heading**

**E D Townley Limited - Participant #: 85 Submission #: 1149**

This refers to "sustainable management of the land resource..". It should refer to sustainable management of natural and physical resources, including the life supporting capacity of its soils.

**Relief Sought:** Amend the heading to refer to sustainable management of natural and physical resources, including the life supporting capacity of its soils

**Otuwhero Estate Limited - Participant #: 7 Submission #: 123**

This refers to "sustainable management of the land resource..". It should refer to sustainable management of natural and physical resources, including the life supporting capacity of its soils.

**Relief Sought:** Amend the heading to refer to sustainable management of natural and physical resources, including the life supporting capacity of its soils

**Outer Limits Limited - Participant #: 48 Submission #: 471**

It is necessary to identify that the only logical expansion for business is into the urban-rural fringe, which inevitably will be the Rural 3 land.

**Relief Sought:** Add new policy 1.3 as follows: "To recognise that the demand for business activity expansion can only be met in Rural 3 zoned land in locations on the fringe of the main Blenheim urban area. These areas as shown on the planning maps will have to meet with the key location criteria as identified in 12.2.1.3 above."

### **V1-12.2.1.1.dis - Rural Environments, 12.2.1.1, discussion**

**E D Townley Limited - Participant #: 85 Submission #: 1150**

The explanation is confusing referring to "quite versatile", "some other parts of the district", and "good land management practice". Either land is versatile or it is not. It is unclear how versatility can be created by population, it is not known what other parts of the district with which it is compared, and the word "good" does not appear in the RMA. The correct word is "sustainable".

**Relief Sought:** Delete the amendments.

**E D Townley Limited - Participant #: 85 Submission #: 1151**

Reference is made to "subdivision and use of small rural lots" and that they "can result" in "unproductive investment". If provision states that a reduction in allotment size "progressively reduces production options" - that is not necessarily proven, though may occur.

The discussion should not be so bold and unsubstantiated in its comments. There will be situations in which a reduction in allotment size would not reduce production options.

**Relief Sought:** Delete the following: "controlled activity minimum allotment size of 8 hectares of the Wairau

Plain has been in place for over twenty years".

**Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 233**

Federated Farmers neither support nor oppose a minimum allotment size of 8ha for the Wairau Plain, however we feel that Council's attempt to retain production options may be better satisfied by addressing the specific issue, rather than merely controlling minimum allotment sizes.

**Relief Sought:** Consider alternatives to maintaining production options, as in some cases smaller or larger minimum allotment sizes may be more appropriate and provide more productive options.

**Jerram P & A - Participant #: 6 Submission #: 106**

There are a large number of rural holdings that are already less than 8 ha and many are in the range of 1-4ha and are not viable economic units. Casting in stone the idea of nothing less than 8 ha for a set period of years is nonsensical and takes no account of potential future economic

**Relief Sought:** Rules should be formulated for subdividing small blocks, without allowing very small sections as has happened for example in Golden Bay. If these 1-4 hectare blocks were to be permitted to be subdivided into areas no smaller than 0.5 ha, with quality controls on size and substance, then water supply and waste management would be easily handled.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 37**

Reduction in allotment sizes does not necessarily reduce productive options. 8ha may be recognised as an economic unit for viticulture development. However other activities can be economic on a lesser area.

**Relief Sought:** Remove the following wording: "A reduction in allotment sizes progressively reduces productive options, which is why a controlled activity minimum allotment size of 8ha for the Wairau Plain has been in place for over 20 years".

**New Zealand Winegrowers - Participant #: 39 Submission #: 391**

NZ Winegrowers supports the amendment of the discussion to include express reference to the importance of the protection of production options on versatile soils. In addition, it supports the maintenance of the 8ha minimum allotment size for subdivisions on the Wairau Plain.

**Relief Sought:** Retain proposed amendments to the discussion section.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 124**

The explanation is confusing referring to "quite versatile", "some other parts of the district", and "good land management practice". Either land is versatile or it is not. It is unclear how versatility can be created by population, it is not known what other parts of the district with which it is compared, and the word "good" does not appear in the RMA. The correct word is "sustainable".

**Relief Sought:** Delete the amendments.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 125**

Reference is made to "subdivision and use of small rural lots" and that they "can result" in "unproductive investment". If provision states that a reduction in allotment size "progressively reduces production options" - that is not necessarily proven, though may occur.

The discussion should not be so bold and unsubstantiated in its comments. There will be situations in which a reduction in allotment size would not reduce production options.

**Relief Sought:** Delete the following: "controlled activity minimum allotment size of 8 hectares of the Wairau Plain has been in place for over twenty years".

**Sherwood, Nancy - Participant #: 61 Submission #: 6988**

"The enduring production..." History and research affirm that enduring production leans heavily towards organics.

"The increase in property values ..." Increasing property values lead to increased rates and increased subdivision. Subdivision inhibits small-scale life supporting development. If rates were not increased until a property was sold and then set according to the sale price, the pressure to subdivide would be removed.

**Relief Sought:** Don't increase rates until a property is sold and then set according to the sale price.



**Watson R & V - Participant #: 12 Submission #: 173**

There is an erroneous assumption about the minimum size allotment of 8ha being a productive block. The growth in lifestyle living is a national trend and is not going to go away. The plan needs to acknowledge this demand and allow for it.

A new area of say 1-2ha blocks would create a nice buffer; control development in a dedicated area; meet the growing demand, generate more rates.

**Relief Sought:** Add a new type of zone with an average of say 1-2ha blocks in an area close to town.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6546****Hadley Reese Partnership - Participant #: 66 Submission #: 6600****Hadley, J A & J P - Participant #: 63 Submission #: 563****J A Hadley Family Trust - Participant #: 68 Submission #: 6769****Tu Jaes Trust - Participant #: 64 Submission #: 6492****Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6720****Wharehunga Forestry Limited - Participant #: 69 Submission #: 6831****Wharehunga Trust - Participant #: 70 Submission #: 6885**

Focus is on "productive" potential rather than sustainability of land resource. This assumes that smaller allotments reduce production options and that lifestyle and residential activities result in "unproductive investment".

**Relief Sought:** Remove or substantiate assumptions and redraft using definable terms relevant under RMA and reflective of effects based management.

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).** 8ha is arbitrary, reduces land value, and requires the use of more land than necessary for some developments.

**Relief Sought:** Review the 8ha minimum size.

**V1-12.2.1.2 - Rural Environments, 12.2.1.2****Bruckel, Paul - Participant #: 57 Submission #: 494**

Support the protection of rural amenity values. However, some of the problems associated with these activities have arisen from inadequate and/or inequitable rules in the Plan. Amendment of noise rules could reduce or remove tensions between neighbours and landowners.

**Relief Sought:** Support

**Clintondale Trust - Participant #: 23 Submission #: 189**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy



needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Amend the third paragraph to read: "Although there is a duty under section 17 of the Act to avoid, remedy or mitigate any adverse effects, the Council recognises that the principal rural activities inherently involve effects that may not practicably meet the expectations of an urban environment. Urban activities at the rural urban interface must expect a reduction in urban amenity levels where there are justifiable and reasonable effects as a result of preserving and sustaining primary production potential and activities in the adjoining rural zone environment. Similarly, the relationship between the owners of existing smaller lifestyle allotments in the rural zone itself, and those undertaking primary production rural activities can also precipitate community tensions through differing expectations about rural living and amenities."

**E D Townley Limited - Participant #: 85 Submission #: 1152**

The last sentence of the provision indicates that "the community" is in conflict - the issue of "different expectations" can be addressed by clear plan provisions identifying a range of activities which occur in the Rural zone and their effects. If Council adopts a cradle to grave approach then it puts itself in the position of being involved in matters best left either to the market or the

**Relief Sought:** None specified

**Hyson, Michael - Participant #: 80 Submission #: 1088**

This section wants to give rural dwellers carte blanche ability to make noise, dust, traffic and smell as if these are essential parts of rural amenity values. It seeks to avoid the requirements of section 17 of the act. Protection of rural amenity values cannot be one sided. Marlborough cannot say that peace and quiet in the cities and rural areas are to be given over to noise of industry. Rural amenity also means somewhere to live and that one can sleep at night.

I do not believe it is good policy to protect excessive country noise at night.

Document is biased towards industry. People cannot adapt to being kept awake at night. If no controls are enacted a hostile environment is being built that will only grow in its animosity. Strong guidance is needed regarding night time noise.

**Relief Sought:** Strong guidance is needed regarding night time noise.

**Jerram P & A - Participant #: 6 Submission #: 107**

There is an inordinate weighting put on so called "rural values". Traditional rural people" as championed in variation 38 are not the traditional farming people of 27 years ago.

There is also a double standard in the discussion where it suggests that amenity and environmental values are important to rural people "including quietness" having stated earlier in the same paragraph that "traditional rural activities make noise which are perceived by some people

**Relief Sought:**

1. Protecting rural values shouldn't mean that people living in the country are able to do anything they wish, regardless of environmental concerns such as noise and water, while anyone else coming to live in the country should be seen as a threat to these "rural values"
2. It is untenable that the current land owners are identified in the variation as "traditional rural people" when the land they manage now is 8, 16, 40 ha grape growing blocks rather than 200, 300, or 500ha livestock farms of the past.
3. It is not acceptable to brand those " traditional rural people" as "good" values and those of everyone else as "not good values" as this section is seeking to do.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 38**

There are a variety of people who may wish to develop different commercial opportunities on the Wairau Plains and the proposed wording says that this is because of economic necessities. The effect of this change would not be an attraction for anybody to enter any other industry other than viticulture. There are many people who happily live in the rural area. The current wording says there are community tensions and in fact this is not necessarily the case.

**Relief Sought:** Remove the last new sentence from paragraph 3 and retain the original wording for the remainder of paragraph 3.

**New Zealand Winegrowers - Participant #: 39 Submission #: 392**

NZ Winegrowers supports the provision. It is appropriate for the plan to recognise that rural

activities inherently involve effects that may not meet the expectations of an urban environment and that the differing expectations about rural living can cause tensions between owners of small "lifestyle" blocks and those undertaking rural activities.

**Relief Sought:** Retain the paragraphs and add the following sentence to the end: "Reverse sensitivity issues are exacerbated by the establishment of these smaller lifestyle blocks in the rural zone and those who come to live in such an environment must acknowledge the presence of an existing rural working environment."

**Otuwhero Estate Limited - Participant #: 7 Submission #: 126**

The last sentence of the provision indicates that "the community" is in conflict - the issue of "different expectations" can be addressed by clear plan provisions identifying a range of activities which occur in the Rural zone and their effects. If Council adopts a cradle to grave approach then it puts itself in the position of being involved in matters best left either to the market or the

**Relief Sought:** None specified

**Sherwood, Nancy - Participant #: 61 Submission #: 502**

I challenge that rural activity has diversified.

Tensions in rural communities could be alleviated by planning for buffer zones. They would provide a visual screen and filter.

Adverse effects should be mitigated in all instances.

"Visitor and worker accommodation..."

Infrastructure e.g. accommodation, public transport, recreational facilities, virtually non-existent.

**Relief Sought:** Adverse effects should be mitigated in all instances.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission#: 6548**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6601**

**Hadley, J A & J P - Participant #: 63 Submission #: 564**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6765**

**Tu Jaes Trust - Participant #: 64 Submission #: 6490**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6689**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6840**

**Wharehunga Trust - Participant #: 70 Submission #: 6890**

Tensions existing in all communities about resource use. The proposed last sentence in paragraph 3 suggests that tension in rural communities is elevated above that which might occur normally - is this in fact the case?

**Relief Sought:** Delete last sentence of third paragraph.

**V1-12.2.1.3 - Rural Environments, 12.2.1.3 Heading**

**N Z Institute of Surveyors - Participant #: 3 Submission #: 39**

Council are not able to "control the extent" if Marlborough is to develop.

**Relief Sought:** Remove the amendment completely.

**Gane, Graeme & Raewyn - Participant #: 36 Submission #: 6962**

**Gane, Laurin - Participant #: 37 Submission #: 6967**

**Gane, Nev & Jenni - Participant #: 34 Submission #: 6952**

**Large, Marie - Participant #: 38 Submission #: 6972**

**Large, Matthew - Participant #: 32 Submission #: 6942**

**Marfell, Bridget - Participant #: 33 Submission #: 6947**

**Marfell, T S & J M - Participant #: 42 Submission #: 443**

**Markview Vineyard - Participant #: 29 Submission #: 319**

**Morris, Melanie - Participant #: 30 Submission #: 6937**

**Wratt, Quentin - Participant #: 35 Submission #: 6957**

All variations to this section are opposed. We note the inclusion of the sentence "however historically there has been a community expectation of one residential dwelling per title, along with related home stay facilities". We can find no evidence or discussion pursuant to section 32 of the RMA to support this view. We note that at pg 9 of the review "the comments on housing density were extremely diverse, reflecting the split views of some who would like to see this form of development proceed to others with fears that this would change rural character of the Wairau Plan" [sic].

The balance of changes in this provision is opposed for the same reasons. There is no supporting

**Relief Sought:** Opposed

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6534**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6617**

**Hadley, J A & J P - Participant #: 63 Submission #: 565**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6770**

**Tu Jaes Trust - Participant #: 64 Submission #: 6486**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6693**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6844**

**Wharehunga Trust - Participant #: 70 Submission #: 6871**

The word "extent" is not relevant in an RMA context. If extent is intended to reflect "cumulative effects" it will be addressed under "effects" generally.

**Relief Sought:** Delete "extent and".

### **V1-12.2.1.3.dis - Rural Environments, 12.2.1.3, discussion**

**Clintondale Trust - Participant #: 23 Submission #: 190**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title,

one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Amend the discussion to read: "The maintenance of a productive rural environment is to a significant extent dependent upon the exclusion of "Residential" activity, the two being intrinsically incompatible for a variety of reasons. However, historically there has been a community and industry expectation of one residential dwelling per title, along with related ancillary buildings and homestay accommodation facilities. As a result of this expectation it needs to be accepted that in some circumstances, rural activities will be required to mitigate adverse environmental effects where these may impact significantly on this limited extent of residential activity located outside, but in the immediate vicinity of the title at the time conducting the activity."

Conversely, any increase in residential activity or density on rural property can progressively reduce rural land use options in the immediate vicinity, impact upon the expected amenities of the rural landscape, and exacerbate existing reverse sensitivity issues. Accordingly, it is a reasonable expectation that residential activities in rural areas proactively mitigate the adverse environmental effects of accepted and foreseeable primary production practices."

**E D Townley Limited - Participant #: 85 Submission #: 1155**

The discussion records "the plan seeks to enable a wide range of activities to establish in the rural area, subject to standards and controls to avoid or mitigate the adverse effects". The discussion then turns to "rural activities" but ignores valid residential activities and rural-residential activities in the rural zone which should be referred to. The discussion also omits reference to remediation of adverse effects.

**Relief Sought:** Recognise the valid presence of residential and Rural Residential activities in the Rural zone and avoiding, remedying or mitigating adverse effects.

**E D Townley Limited - Participant #: 85 Submission #: 1156**

The discussion seems to preclude the development of commercial enterprises or industries related to the rural area, and these are not addressed, nor is worker accommodation which is critical to the rural areas.

**Relief Sought:** Amend the discussion to identify the appropriateness of establishment of rural related industry and worker accommodation in the rural areas.

**E D Townley Limited - Participant #: 85 Submission #: 1154**

Refers to the maintenance of the rural environment being "to some extent dependent on the exclusion of residential activity, and being somewhat incompatible for a number of reasons". The statement is a nonsense, residential activities are an appropriate activity within the rural zone so as to enable development of the rural resource.

**Relief Sought:** Delete the provision.

**E D Townley Limited - Participant #: 85 Submission #: 1153**

The discussion should explain what the incompatibility is, what the effects of it are and how they are addressed by the Plan rules. The discussion fails to address the obligation imposed on the land owner under Section 17 RMA.

**Relief Sought:** Tailor the discussion to more effectively reflect what is occurring in the rural and residential areas, and identify the use of section 17 as the appropriate vehicle for control.

**Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 236**

In respect of the last paragraph, Federated Farmers feels it is completely unreasonable to expect permanent rural workers to find accommodation in a township. Travel times for workers from a township to farm could be quite considerable - up to 1.5hrs in some areas. Furthermore, working on a farm can require late night callouts to tend to young animals etc. Not having workers accommodation as an option could make finding employees difficult, as this is often an expectation of workers.

Travel cost is rising dramatically and could provide uneconomical. Also forcing rural workers to live in townships will only increase the amount of traffic using roads, which is contrary to council's aim of maintaining the integrity and safety of the road network. Having fatigued workers travelling from a town to a farm in the middle of the night to tend young animals may reduce the safety of roads.

**Relief Sought:** Delete the following from amended paragraph: "and visitor and worker accommodation" and delete bullet points "travel times for workers are of short duration" and "community facilities are located in urban areas".

**Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 235**

Federated Farmers believes that the variation should be flexible to suit each individual circumstance - regardless of "historical expectations". The Federation would also like to raise the point that the expectation of one dwelling per title is historical, and therefore not necessarily a true reflection of present expectations.

**Relief Sought:** Amend discussion to read: "The maintenance of a rural environment is to some extent dependent on the exclusion of "Residential" activity, the two being somewhat incompatible for a number of reasons."

**Horticulture New Zealand - Participant #: 27 Submission #: 252**

Horticulture NZ recognises there are issues associated with provision of workers accommodation, especially seasonal workers. However, the measures which are introduced in variation 38 are draconian and unworkable as not all workers accommodation is of a temporary nature and can be accommodated in urban locations with workers travelling to the workplace. Linked with restriction on residential dwellings on Rural 3 and 4 means that provision of housing for farm and orchard staff will be very difficult.

A more flexible regime is needed to provide accommodation.

There are two requirements for workers accommodation: seasonable workers temporary accommodation and; housing for permanent workers.

While some seasonable workers accommodation may be provided in urban locations, there are situations where it is appropriate that the accommodation is on site or in the rural area.

The variation suggests that workers accommodation is located in townships and that travel times are short. This is not necessarily the situation and does not reflect the diversity of need.

**Relief Sought:** Delete "and visitor and worker accommodation" and "travel times for workers are of a short duration" in last paragraph in 12.2.1.3.

**Horticulture New Zealand - Participant #: 27 Submission #: 259**

Horticulture NZ does not support the approach to residential dwellings in the rural zones and the requirement for either a discretionary or non-complying consent of more than one dwelling on a title. Such provisions do not provide an adequate framework for provision of dwellings for rural workers. Owners within only one title are disadvantaged.

It has generally been recognised that there may be more than one dwelling on rural properties to service the needs to the property and this should be allowed to continue.

The requirements for dwelling house for dependent relatives are draconian and unworkable.

The approach seems based on "lifestyle" development being "residential" but this overlooks the fact there is a need for residences for rural workers. If the focus is on lifestyle type residences that should be stated. Residences that service the rural sector are not usually considered incompatible with the rural environment. There is no distinction between lifestyle type activity and that necessary for the rural productive sector.

**Relief Sought:** Amend the first paragraph of 12.2.1.3 to read as follows: "The maintenance of a rural environment is dependent on providing for the continued rural productive sector and some

lifestyle development which recognises and accepts that there is potential for incompatibilities with being in a rural location."

**N Z Institute of Surveyors - Participant #: 3 Submission #: 40**

It is not the case that all people living in a residential area within the Wairau Plains are incompatible with the rural activities. In regards to the second paragraph, residential or Rural Residential properties are a resource that is established and most residential units have an extended lifetime for many years. The last sentence of the third paragraph indicates that any of the activities listed above causes loss of economic resources. This is not the case. There are many activities that are of industrial or commercial nature that are subsidiary to the main rural activity.

In regards to the fourth paragraph, residential activity should be included in this section as this is a significant activity within the Plains.

**Relief Sought:**

1. Retain the original wording of the first paragraph.
2. Remove the second paragraph completely.
3. Remove the amendment to the final sentence of the third paragraph.
4. Add residential activity to the list of rural activities in the fourth paragraph.

**New Zealand Winegrowers - Participant #: 39 Submission #: 393**

NZ Winegrowers supports the amendments. In addition, it supports the variation acknowledging the danger of increased residential expansion resulting in a progressive reduction in the availability of versatile land for rural production purposes.

However the wording fails to identify the potential adverse effects, nor the rural activities that may be required to mitigate those effects. If residential activity takes place in rural area, residents must understand they are moving into an active rural working environment. Some business activities are also likely to be established in the rural zone.

Given the seasonal nature of some rural activities, it may also be necessary to provide worker accommodation onsite where the activity is located in a location remote from easy or frequent access to town. This is particularly the case in Awatere Valley. Such worker accommodation should be permitted where it can easily be accommodated within an existing residential building or equivalent structure.

**Relief Sought:**

1. Amend last sentence in first paragraph to read: "Given this expectation, where adverse effects are generated above and beyond those usually expected on a rural area, some rural activities may be required to implement mitigation measures. The rural zone is an existing active working environment and therefore its residents must expect to be subject to the effect of living in such an environment.

2. Amend second sentence in third paragraph to include a "winery" in the list of rural activities and in the fifth line, add the word "produced" before the words "grown or reared on site".

3. Add a new sentence to the end of the discussion as follows:
  - Worker accommodation may be provided on site within an existing structure; or
  - the proposed work place is not conveniently located to a town centre; or
  - the town centre is unable to provide sufficient worker accommodation to accommodate seasonal requirements."

**Otuwhero Estate Limited - Participant #: 7 Submission #: 130**

The discussion seems to preclude the development of commercial enterprises or industries related to the rural area, and these are not addressed, nor is worker accommodation which is critical to the rural areas.

**Relief Sought:** Amend the discussion to identify the appropriateness of establishment of rural related industry and worker accommodation in the rural areas.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 127**

The discussion should explain what the incompatibility is, what the effects of it are and how they are addressed by the Plan rules. The discussion fails to address the obligation imposed on the land owner under Section 17 RMA.

**Relief Sought:** Tailor the discussion to more effectively reflect what is occurring in the rural and residential



areas, and identify the use of section 17 as the appropriate vehicle for control.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 128**

Refers to the maintenance of the rural environment being "to some extent dependent on the exclusion of residential activity, and being somewhat incompatible for a number of reasons". The statement is a nonsense, residential activities are an appropriate activity within the rural zone so as to enable development of the rural resource.

*Relief Sought:* Delete the provision.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 129**

The discussion records "the plan seeks to enable a wide range of activities to establish in the rural area, subject to standards and controls to avoid or mitigate the adverse effects". The discussion then turns to "rural activities" but ignores valid residential activities and rural-residential activities in the rural zone which should be referred to. The discussion also omits reference to remediation of adverse effects.

*Relief Sought:* Recognise the valid presence of residential and Rural Residential activities in the Rural zone and avoiding, remedying or mitigating adverse effects.

**Outer Limits Limited - Participant #: 48 Submission #: 469**

The activities listed in the decision request will reduce leakage from Marlborough by enabling appropriate developments that will also provide extra employment.

*Relief Sought:* Add following paragraph after 12.2.1.3: "Nevertheless, given the shortfall of land for both commercial (particularly large format retail) and industrial activity (of any type), it will be necessary to accommodate the unmet demand for expansion of such activities on the fringe of the urban area, which will occur in the Rural 3 zone. These will be located in areas where:

- they will be well located on the major road networks;
- they will also service local neighbourhoods;
- they will limit journeys to work and shopping;
- they will be close to existing community facilities."

**Outer Limits Limited - Participant #: 48 Submission #: 470**

Urban growth will have to be accommodated in fringe locations in the Rural 3 zone. These are the only areas at the edge of the urban area which are appropriate for much needed industrial and commercial (large format retail) activities.

*Relief Sought:* Delete the paragraph commencing "Furthermore, allowing any industry..." and replace with the following: "It is recognised that, to be sustainable, any industrial or commercial enterprise establishing in a previously rural area must be comprehensively planned, and the above principles will apply to ensure that only areas that are appropriate are zoned or developed for such purposes. The general principle will be to provide for the growth of industrial and commercial activity in the new peripheral locations, given that there is limited additional capacity in the current township zones, and so that retail leakage from Marlborough is reduced and further employment opportunities are provided."

**Rewood Pass Vineyards - Participant #: 41 Submission #: 439**

Oppose the number of assertions with regard to worker accommodation. There is a need for worker accommodation and that should be specified. The assertion that "there is a supply of labour within the townships" is irrelevant. Accommodation within the rural area should be as much considered as any other industry/farming based business and that should include viticulture contractors and engineering repair etc.

"Travel times for workers are of short duration" is meaningless. It is far more efficient to have the workers nearer the place of work and reduce traffic on the road.

"Community facilities are located in urban areas" is of little relevance in the argument to urbanise a rural workforce.

*Relief Sought:*

1. Enable workers accommodation in this clause under the rural activities.
2. Remove the proposed additional wording "and visitor and worker accommodation" from the last paragraph.
3. Remove the bullet points under reasons as they are superfluous and have little relevance.



**Weyerhaeuser New Zealand Limited - Participant #: 84 Submission**  
WNZI supports proposed changes.

**Relief Sought:** Support

**Gane, Graeme & Raewyn - Participant #: 36 Submission #: 6963**

**Gane, Laurin - Participant #: 37 Submission #: 6968**

**Gane, Nev & Jenni - Participant #: 34 Submission #: 6953**

**Large, Marie - Participant #: 38 Submission #: 6973**

**Large, Matthew - Participant #: 32 Submission #: 6943**

**Marfell, Bridget - Participant #: 33 Submission #: 6948**

**Marfell, T S & J M - Participant #: 42 Submission #: 444**

**Markview Vineyard - Participant #: 29 Submission #: 320**

**Morris, Melanie - Participant #: 30 Submission #: 6938**

**Wratt, Quentin - Participant #: 35 Submission #: 6958**

All variations to this section are opposed. We note the inclusion of the sentence "however historically there has been a community expectation of one residential dwelling per title, along with related home stay facilities". We can find no evidence or discussion pursuant to section 32 of the RMA to support this view. We note that at pg 9 of the review "the comments on housing density were extremely diverse, reflecting the split views of some who would like to see this form of development proceed to others with fears that this would change rural character of the Wairau Plan" [sic].

The balance of changes in this provision is opposed for the same reasons. There is no supporting

**Relief Sought:** Oppose

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6535**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6609**

**Hadley, J A & J P - Participant #: 63 Submission #: 566**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6768**

**Tu Jaes Trust - Participant #: 64 Submission #: 6504**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6697**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6827**

**Wharehunga Trust - Participant #: 70 Submission #: 6868**

Residential activity is a permitted activity ( accepting existing Plan rules omit this) in the rural environment, and needs to be included as an activity that occurs in rural areas and is necessary and desirable.

**Relief Sought:** Reword to recognise importance of permitted activity status for residential activity. Focus on section 17 [RMA] obligations.

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**  
This restricts workers to townships and villages.

**Relief Sought:** None specified

#### **V1-12.2.1.4 - Rural Environments, 12.2.1.4**

**Sherwood, Nancy - Participant #: 61 Submission #: 503**

Both water quality and quantity are deteriorating. There is an increasing emphasis on "treating"

water to meet national standards. Emphasis needs to shift to protecting at source.

**Relief Sought:** Shift the emphasis to protecting water at source.

**Witherhills Vineyards Marlborough Limited - Participant #: 77 Submission #:**

Need to address the deteriorating position of surety of water supplies. What must take place is a more proactive manner of water management that allows surety of supply while maintaining the ecosystems of the province.

**Relief Sought:** Amend first sentence of 12.2.1.4 to read: "The readily availability and surety of quality ground and surface waters in quantity is a major factor underlying the intensive development of the Wairau Plain. Sustainable management of the water resource and surety of supply is essential to the sustainability of the rural environment."

**V1-12.2.1.5 - Rural Environments, new sub-issue 12.2.1.5**

**Clintondale Trust - Participant #: 23 Submission #: 191**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Amend the last sentence in the paragraph to read: "However, it is critical to retain what biodiversity remains and enhance on this at every opportunity."

**Department of Conservation - Participant #: 229 Submission #: 5436**

Department agrees with new sub issue and considers it a useful part of the plan. The issue statement and explanation are accordingly supported.

**Relief Sought:** Retain new sub issue 12.1.1.5.

**New Zealand Winegrowers - Participant #: 39 Submission #: 394**

NZ Winegrowers supports new sub issue 12.2.1.5. It is subjective to state that the Wairau Plain is "in a very poor state" without further description or qualification. The purpose of this issue is unclear in that it appears to seek to aim to restore indigenous biodiversity but acknowledges that this may not be possible in view of existing productive uses. The issue should be qualified to refer to "existing" indigenous biodiversity only to ensure that existing activities and uses are not

**Relief Sought:** 1. Amend heading of issue to refer to "existing" indigenous biodiversity.  
2. Delete the second sentence of the paragraph.

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28 Submission #: 298**

Support new sub issue and explanation with amendments as set out below.

**Relief Sought:** Amend new sub issue to read: "The Wairau Plain is in an extremely modified state and its ecological values are largely confined to its network of streams, rivers and drains. In terms of indigenous biodiversity (native plants and animals), the Wairau Plain is in a very poor state. The Plain was largely denuded of indigenous vegetation and wetlands to make way for farming early last century. What remains is of vital importance. The Wairau / Awatere area is one of

five important areas in New Zealand where large numbers of locally endemic plants and animals have evolved and do not occur anywhere else in the world. It is critical to retain what biodiversity remains and to build on this at every opportunity."

**Sherwood, Nancy - Participant #: 61 Submission #: 505**

This is still happening and needs to stop immediately.

*Relief Sought:* None specified

**TrustPower Limited - Participant #: 10 Submission #: 168**

It is not appropriate to introduce a strong protection and enhancement focus on the waterways of the Wairau Valley simply because adjacent land use practices have eroded biodiversity values. Any endeavour should be based on appropriate and objective assessment of the true biodiversity value of the waterways.

Such an approach will unduly restrict the use of the valley's waterways for electricity generation. The very absolute wording of new issue 12.2.1.5 could preclude such schemes from being developed. The Wairau scheme is of significant importance to the social, economic and cultural well-being of the district. The overall benefits of scheme might well outweigh adverse effects.

In addition, some man made waterways are developed and maintained in such a way as to be functional rather than important for biodiversity values.

*Relief Sought:* Delete

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

Sub issue 12.2.1.5 must not be allowed to compromise drainage and flood plain management.

*Relief Sought:* Please clarify.

## **V1-12.2.1.6 - Rural Environments, new sub-issue 12.2.1.6**

**Horticulture New Zealand - Participant #: 27 Submission #: 273**

Throughout the plan there are references to the "working rural landscape" and the need for it to be considered in the context of a range of activities. Yet it is not defined. It needs to be clear what comprises or makes up the "working rural landscape" so there is certainty as to the outcomes anticipated.

It would appear to be more the rural character that is being described - key components that make the rural area unique. Such character includes smells and noises.

The variation in places refers to an "attractive landscape" or what is "aesthetically pleasing". It is considered that these are subjective matters and that it would be best to delete such references and focus on the description of rural areas.

*Relief Sought:* Amend the last sentence as follows: "it is important therefore to strike a balance that enables the continuity of the working rural landscape and supports natural systems, whilst being complimentary to, and supporting, a range of rural activities."

**La Plante, Steven - Participant #: 86 Submission #: 1193**

Agree with the central concept, but object to reference to "replaced by thousands of hectares of grapes" and "removal of remaining stands of tress is strongly opposed".

*Relief Sought:* Object to reference to "replaced by thousands of hectares of grapes" and "removal of remaining stands of tress is strongly opposed".

**N Z Institute of Surveyors - Participant #: 3 Submission #: 41**

The size and shape of allotments created by subdivision are not necessarily linked to the type of buildings that can be erected and the space around those buildings. No acknowledgement is made of the fact that residential dwelling houses and the surrounding landscaping in fact enhances the rural amenities.

*Relief Sought:* Remove the first sentence of the second paragraph

**New Zealand Winegrowers - Participant #: 39 Submission #: 395**

NZ Winegrowers does not support new sub issue . It is inappropriate for the variation to attempt to "strike a balance that enables the continuity of an attractive working rural landscape". The wording of new 12.2.1.6 expressly acknowledges the subjective nature of any such assessment and fails to acknowledge the ongoing productive use and value of the Wairau Plain.

It is important to recognise the productive uses of the Wairau Plain and associated landscape values. However the plan should not be a mechanism for subjective judgements of the amenity offered by existing rural activities, nor to control the allocation of productive resources in the rural environment on the basis of amenity. Productive uses form part of the amenity and landscape.

**Relief Sought:** 1.Delete, or in the alternative,  
2.Amend to remove the focus on subjective amenity and focus on the existing contribution of productive uses in the rural environment to the landscape.

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28**

**Submission #: 299**

Support new sub issue

**Relief Sought:** Support

**Sherwood, Nancy - Participant #: 61 Submission #: 506**

We should also encourage diversity in forestry, reinstate shelterbelts, mixed crops, orchards and limit viticulture to areas best suited.

**Relief Sought:** Encourage diversity and limit viticulture to the areas best suited in terms of soil and climate.

**V1-12.2.1.9 - Rural Environments, new issue 12.2.1.9****Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 237**

Federated Farmers believes that growth should not be constricted by roading. Council should encourage development and upgrade and/or extend roads where necessary.

**Relief Sought:** Add the following sentence, or words to this effect: "Council is committed to providing appropriate roading for the Wairau / Awatere and will expand roads where necessary."

**NZ Automobile Association Incorporated - Participant #: 240 Submission #:**

Support. Recommend that Bells Rd and New Renwick Rd be afforded the same level of consideration as other listed arterials. These two routes provide for alternative access as well as providing an arterial function. We also need to keep options open for providing cycle arterials which avoid the higher volume primary arterial routes.

**Relief Sought:** Afford Bells Rd and New Renwick Rd the same level of consideration as other listed arterials.

**V1-12.2.1.dis1 - Rural Environments, Issue, first paragraph****E D Townley Limited - Participant #: 85 Submission #: 1147**

The Wairau Plain containing the versatile land is represented by Rural 3 zoning, and if so the variation provision should relate to that zoning, not the whole of the rural areas including Rural 4.

**Relief Sought:** Amend the Plan to reflect the above submission

**N Z Institute of Surveyors - Participant #: 3 Submission #: 34**

There is a wide variety of soil types in the Wairau Plains and "versatile land" does not reflect this.

**Relief Sought:** Delete "versatile land of the".

**New Zealand Winegrowers - Participant #: 39 Submission #: 388**

NZ Winegrowers supports the amendments and submits that it is appropriate to recognise the versatile uses of the Wairau Plain as well as acknowledging viticulture as a principle land use.

**Relief Sought:** Retain amendments

**Otuwhero Estate Limited - Participant #: 7 Submission #: 121**

The Wairau Plain containing the versatile land is represented by Rural 3 zoning, and if so the

variation provision should relate to that zoning, not the whole of the rural areas including Rural 4.

**Relief Sought:** Amend the Plan to reflect the above submission

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6513**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6625**

**Hadley, J A & J P - Participant #: 63 Submission #: 560**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6752**

**Tu Jaes Trust - Participant #: 64 Submission #: 6501**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6712**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6848**

**Wharehunga Trust - Participant #: 70 Submission #: 6875**

Wording is confusing- reference made to "Wairau Plain" being Rural 3 zoning and "versatile land of Wairau Plain" being Rural 3 Zoning.

**Relief Sought:** Confirm that all of the Wairau Plain is represented by Rural 3 zoning. Use planning map colours or hatching as reference.

### **V1-12.2.1.dis2 - Rural Environments, Issue, third paragraph**

**N Z Institute of Surveyors - Participant #: 3 Submission #: 35**

No reference is made in the amendment to other land uses that are prevalent in the Wairau Plains e.g. wineries, residential activities, tourist facilities, tourist accommodation which are now a vital part of the Wairau Plains

**Relief Sought:** Add residential, visitor accommodation, wineries, tourist facilities to the paragraph.

**New Zealand Winegrowers - Participant #: 39 Submission #: 389**

NZ Winegrowers supports the amendments and submits that it is appropriate to recognise the versatile uses of the Wairau Plain as well as acknowledging viticulture as a principle land use.

**Relief Sought:** Retain amendments.

**Outer Limits Limited - Participant #: 48 Submission #: 468**

Other appropriate rural industrial activities need to be recognised as important features in the rural areas.

**Relief Sought:** Add after "food processing and dairy farming": "...and some rural industrial activity (such as cool stores, wineries and agricultural engineering)."

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6524**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6590**

**Hadley, J A & J P - Participant #: 63 Submission #: 561**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6776**

**Tu Jaes Trust - Participant #: 64 Submission #: 6500**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6714**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6858**

**Wharehunga Trust - Participant #: 70 Submission #: 6879**

Land uses also include wineries, visitor accommodation, restaurants, residences, and community facilities.

**Relief Sought:** include other land uses or modify text to "the principal agricultural land uses".

### V1-12.2.1.dis3 - Rural Environments, Issue, last paragraph

#### **Clintondale Trust - Participant #: 23 Submission #: 188**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Amend the third bullet point to read: "Control of the extent, density, and effects of residential, commercial and industrial development in the rural area to preserve the versatile soils for primary production purposes."

#### **Department of Conservation - Participant #: 229 Submission #: 5435**

Department supports the amendment to include "maintenance and enhancement of ecological values". The area retains some important indigenous biodiversity values that contribute towards the quality of the rural environment.

**Relief Sought:** Retain 5th bullet point (maintenance and enhancement of ecological values) in the list of key issues.

#### **E D Townley Limited - Participant #: 85 Submission #: 1148**

The "key issues" exclude reference to a number of other natural and physical resources requiring to be sustainably managed e.g. use of buildings and built development; provision for people and workers; maintenance of the water resource. These should be included.

**Relief Sought:** Amend to include as key issues:

- . The use of buildings and built development; .
- . Provision for people and workers;
- . Maintenance of the water resource.

#### **Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 232**

Federated Farmers would like Council to recognise the importance of drainage and flood plain management, and to ensure that this sustainable management is not compromised by the enhancement of ecological values and indigenous biodiversity.

**Relief Sought:** Amend bullet point 5 to read: "Maintenance and enhancement of ecological values, with particular emphasis on indigenous biodiversity, without compromising the drainage and flood plain management."

#### **Horticulture New Zealand - Participant #: 27 Submission #: 274**

Throughout the plan there are references to the "working rural landscape" and the need for it to be considered in the context of a range of activities. Yet it is not defined. It needs to be clear what comprises or makes up the "working rural landscape" so there is certainty as to the outcomes anticipated.

It would appear to be more the rural character that is being described - key components that make the rural area unique. Such character includes smells and noises.

The variation in places refers to an "attractive landscape" or what is "aesthetically pleasing". It is



considered that these are subjective matters and that it would be best to delete such references and focus on the description of rural areas.

**Relief Sought:** Amend bullet point 6 as follows: "maintenance of a rural working landscape".

**N Z Institute of Surveyors - Participant #: 3 Submission #: 36**

Bullet Point 1: Council has very little power to control the management of the versatile soils as the activities are variable. This is contrary to the RMA.

Bullet Point 3: Council does not have any effective controls to control the extent of residential and commercial industrial development in the rural area. Unless Council is going to create prevalent activities for those activities, then that should be deleted.

**Relief Sought:** 1. That bullet point 1 be removed completely.  
2. That "extend and" be removed from bullet point 3.

**New Zealand Winegrowers - Participant #: 39 Submission #: 390**

NZ Winegrowers supports in part the amendment to the last paragraph. It is appropriate to recognise the life supporting capacity of the soils. The extent and effects of residential, commercial and industrial development in this area must be strictly controlled. However, any reference to "maintenance and enhancement of landscape values" should not be promoted or sought to the detriment of the protection of the productive and life supportive capacity of the soils of the Wairau Plain. In the last bullet point it is unclear what, if any, adverse effects are sought to be

**Relief Sought:** 1. Add the following to the end of the third bullet point: "to preserve versatile soils for primary productive purposes."  
2. Add a new bullet point as follows: "preserving and protecting the productive and life supporting qualities of the soil in the rural area."  
3. Delete or amend the last bullet point to clarify that adverse effects should be mitigated.  
4. Retain the remainder of the paragraph and bullet points.

**NZ Automobile Association Incorporated - Participant #: 240 Submission #:**

Support the key issues, in particular bullet points 2, 3, 6, 8, 9 and 10.

**Relief Sought:** Support

**Otuwhero Estate Limited - Participant #: 7 Submission #: 122**

The "key issues" exclude reference to a number of other natural and physical resources requiring to be sustainably managed e.g. use of buildings and built development; provision for people and workers; maintenance of the water resource. These should be included.

**Relief Sought:** Amend to include as key issues:  
. The use of buildings and built development; .  
. Provision for people and workers;  
. Maintenance of the water resource.

**Sherwood, Nancy - Participant #: 61 Submission #: 501**

"Sustainable management of versatile land..." is threatened by large scale intensification of large scale agriculture/viticulture. Desertification is the end game.

"Safe guarding of water resources" Ever increasing uses are putting unsustainable demands on the finite resources of rivers and groundwater. Demand is outstripping renewal at an unknown rate. The cumulative effects are depletion and contamination of ground water.

"Mitigating the adverse effects of land use activity." Council needs to "geo-map" the province and define areas where sustainable development is compatible with natural resources. Overgrazing and clear cutting needs to be stopped.

**Relief Sought:** 1. Council should geo map the province and define areas.  
2. Council needs to take a role in providing resources into researching and supporting organic practices.  
3. Stop over grazing and clear-cutting of hillsides.

**Transit New Zealand - Participant #: 24 Submission #: 210**

Transit supports the inclusion within the Wairau Plan area of "maintenance of the integrity of the arterial roading network" as a key issue.



**Relief Sought:** Support

**Transpower New Zealand Limited - Participant #: 25 Submission #: 223**

The list of issues includes a wide range of matters that contribute to sustainable development. Transport therefore sees to add a new matter on the list, ensuring the protection of the National

**Relief Sought:** Add the following key issue to the list of key issues: "maintenance of the integrity of the National Grid and security of electricity supply."

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6516**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6613**

**Hadley, J A & J P - Participant #: 63 Submission #: 562**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6772**

**Tu Jaes Trust - Participant #: 64 Submission #: 6496**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6713**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6863**

**Wharehunga Trust - Participant #: 70 Submission #: 6883**

The word "extent" included in bullet point 3 is not relevant in an RMA context. If extent is intended to reflect "cumulative effects", it will be addressed under "effects" generally.

**Relief Sought:** Remove "extent".

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

This is contradictory. Restoration is not possible and adverse effects impossible to define.

The landscape working groups are being given a licence to make a profit at the expense of subdividers and developers. This is unethical.

**Relief Sought:** Delete the amendments.

## **V1-12.2.2.1.1 - Rural Environments, policy 12.2.2.1.1**

**Clintondale Trust - Participant #: 23 Submission #: 192**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Amend policy 1.1 to read: "To preserve and sustainably manage the versatile soils of the Wairau Plain and recognise their life supporting and productive capacity."

**E D Townley Limited - Participant #: 85 Submission #: 1157**

The Plan provision is confusing, on the one hand policy 1.1 refers to "the versatile soils of the...lower Wairau Plain", but the (explanation) talks about the objectives and policies protecting

the versatility of soils as being "Wairau Plain".

**Relief Sought:** 1. Clarify what is intended to be addressed, use consistent and defined terms; and  
2. Identify what the lower Wairau Plain is - if it is to relate to the Rural 3 zone then the Plan should say so.

**New Zealand Winegrowers - Participant #: 39 Submission #: 396**

NZ Winegrowers supports the amendment to policy 1.1 in part. However, it considers that the policy should not only manage but also preserve the versatile soils.

**Relief Sought:** Amend policy by inserting the words "preserve and" before the words "sustainably manage".

**Otuwhero Estate Limited - Participant #: 7 Submission #: 131**

The Plan provision is confusing, on the one hand policy 1.1 refers to "the versatile soils of the...lower Wairau Plain", but the (explanation) talks about the objectives and policies protecting the versatility of soils as being "Wairau Plain".

**Relief Sought:** 1. Clarify what is intended to be addressed, use consistent and defined terms; and  
2. Identify what the lower Wairau Plain is - if it is to relate to the Rural 3 zone then the Plan should say so.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6537**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6615**

**Hadley, J A & J P - Participant #: 63 Submission #: 567**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6788**

**Tu Jaes Trust - Participant #: 64 Submission #: 6508**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6688**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6854**

**Wharehunga Trust - Participant #: 70 Submission #: 6935**

Unclear whether Wairau Plain is all of Rural 3 zone and also whether versatile soils exist throughout this zone or only in the lower Wairau Plain. This is not clearly defined. Assumption that adverse cumulative effects will result.

**Relief Sought:** Clarify terminology and identify areas on planning maps.

## **V1-12.2.2.1.2 - Rural Environments, policy 12.2.2.1.2**

**Clintondale Trust - Participant #: 23 Submission #: 5667**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Amend policy to read: "To enable intensive rural activities to utilize the full range and potential of

the soil types and microclimates available within the Wairau Plains".

**Clintondale Trust - Participant #: 23 Submission #: 7010**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Amend policy 1.2 to read: "To enable intensive rural activities to utilize the full range and potential of the soil types and microclimates available within the Wairau Plains".

**E D Townley Limited - Participant #: 85 Submission #: 7012**

The Plan provision is confusing, on the one hand policy 1.1 refers to "the versatile soils of the...lower Wairau Plain", but the (explanation) talks about the objectives and policies protecting the versatility of soils as being "Wairau Plain".

**Relief Sought:** 1. Clarify what is intended to be addressed, use consistent and defined terms; and 2. Identify what the lower Wairau Plain is - if it is to relate to the Rural 3 zone then the Plan should say so.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 42**

The amended policy 1.2 contains the word "lower" Wairau Plain, whereas other sections of the plan have been amended to remove the word "lower".

**Relief Sought:** Remove "lower" from amended policy

**New Zealand Winegrowers - Participant #: 39 Submission #: 397**

NZ Winegrowers supports the amendment to policy 1.2 in part. It is appropriate that the plan refer to rural activities as opposed to farming activities in order to properly recognise the range of rural activities undertaken on the Wairau Plain. The plan should also provide for the potential use of the soil types and micro-climates available.

**Relief Sought:** Amend policy by inserting the word "full" before the word "range", and inserting the words "and potential" after the word "range".

**Otuwhero Estate Limited - Participant #: 7 Submission #: 7009**

The Plan provision is confusing, on the one hand policy 1.1 refers to "the versatile soils of the...lower Wairau Plain", but the (explanation) talks about the objectives and policies protecting the versatility of soils as being "Wairau Plain".

**Relief Sought:** 1. Clarify what is intended to be addressed, use consistent and defined terms; and 2. Identify what the lower Wairau Plain is - if it is to relate to the Rural 3 zone then the Plan should say so.

**Sherwood, Nancy - Participant #: 61 Submission #: 507**

The adverse effects of intensive farming practices and irrigation need to be taken into account when ensuring sustainability of the rural environment.

**Relief Sought:** Replace "intensive" with "sustainable"

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #:6580**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6589**

**Hadley, J A & J P - Participant #: 63 Submission #: 5679**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6778**

**Tu Jaes Trust - Participant #: 64 Submission #: 6467**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6657**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6804**

**Wharehunga Trust - Participant #: 70 Submission #: 6877**

Unclear whether Wairau Plain is all of Rural 3 zone and also whether versatile soils exist throughout this zone or only in the lower Wairau Plain. This is not clearly defined. Assumption that adverse cumulative effects will result.

**Relief Sought:** Clarify terminology and identify areas on planning maps.

### **V1-12.2.2.1.ex - Rural Environments, 12.2.2.1, explanation**

**Clintondale Trust - Participant #: 23 Submission #: 193**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Amend the explanation as follows: "The objective and policies are intended to preserve and protect the versatility and potential of the soils of the Wairau Plain, enabling viable primary production activities to be conducted whilst ensuring that any resulting cumulative effects on those versatile soils are carefully considered."

These soils, and the consequent versatile, but finite potential of the land resource of the Wairau Plain, are significant assets that need to be properly managed to ensure the long term sustainability of the rural environment in this region."

**E D Townley Limited - Participant #: 85 Submission #: 1158**

The explanation does not accord with policies 1.1. and 1.2 in that versatile soils of the "Wairau Plain" are referred to, but policy 1.1 and 1.2 relate only to the lower Wairau Plain.

**Relief Sought:** 1. Clarify what is intended to be addressed, use consistent and defined terms; and 2. Identify what the lower Wairau Plain is - if it is to relate to the Rural 3 zone then the Plan should say so.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 43**

The wording results in the addition of "adverse cumulative effects" which is not defined and cannot be established.

**Relief Sought:** That "cumulative" be deleted from the second paragraph.

**New Zealand Winegrowers - Participant #: 39 Submission #: 398**

NZ Winegrowers opposes the amended provision to the extent that the section fails to specifically identify the "adverse cumulative effects" the paragraph is concerned with. Without clarifying what adverse cumulative effects are being specifically contemplated, the objectives of the variation are unclear and contradictory to the extent that they seek to both protect and maintain versatile soils in the Wairau Plain.

**Relief Sought:** Either delete the amendment to the new second sentence of the explanation, or in the alternative, identify the adverse cumulative effects the variation is seeking to prevent.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 132**

The explanation does not accord with policies 1.1. and 1.2 in that versatile soils of the "Wairau Plain" are referred to, but policy 1.1 and 1.2 relate only to the lower Wairau Plain.

**Relief Sought:** 1. Clarify what is intended to be addressed, use consistent and defined terms; and  
2. Identify what the lower Wairau Plain is - if it is to relate to the Rural 3 zone then the Plan should say so.

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28  
Submission #: 300**

Support, with amendments.

**Relief Sought:** Amend explanation to read: "The policies are aimed at enabling activities to occur while ensuring that any adverse cumulative effects on the versatile soils of the Wairau Plain are avoided to protect health of the soils."

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6522**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6587**

**Hadley, J A & J P - Participant #: 63 Submission #: 568**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6794**

**Tu Jaes Trust - Participant #: 64 Submission #: 6488**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6704**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6852**

**Wharehunga Trust - Participant #: 70 Submission #: 6917**

Unclear whether Wairau Plain is all of Rural 3 zone and also whether versatile soils exist throughout this zone or only in the lower Wairau Plain. This is not clearly defined. Assumption that adverse cumulative effects will result.

**Relief Sought:** 1. Clarify terminology and identify areas on planning maps.  
2. Replace the word "the" with "any" to read "any resulting adverse cumulative effects".

## **V1-12.2.2.2 - Rural Environments, 12.2.2.2, explanation**

**Clintondale Trust - Participant #: 23 Submission #: 197**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title,



one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** 1. Amend the first paragraph of the explanation as follows: "The rural environment has particular amenity and environmental values which are important to rural people. These include privacy, rural outlook, space, ease of access, clean air, and at times, quietness. However, a wide range of activities occur in rural areas, including viticulture, traditional livestock farming, and the farming of crops, intensive pastoral and horticultural enterprises. These result in levels of noise, dust, traffic generation, and smell that are an integral part of rural amenity values, and which will be noticeable to residents in rural areas. Provided that these accepted rural activities do not constitute an inordinate general nuisance or health risk, the council considers that they should be accepted as natural and anticipated components of rural amenity values by those determining to reside in the rural areas.

2. Amend the last paragraph of the explanation to read: "Given that there has been an historical expectation for residential activity to occur on rural titles within the Rural 3 zone, the policies expressly provide for this to continue. The policies reinforce this expectation by ensuring that it is not prevented by such mechanisms as "no build" covenants, whilst introducing the expectation that residents take initiatives to mitigate the effects of accepted rural activities. Homestay rights, and rights for dependent relatives are also provided for, subject to reasonable restrictions.

**E D Townley Limited - Participant #: 85 Submission #: 1160**

The provision is misconceived - whilst using a lot of words the meaning is unclear. The provisions appear to be a build up to the preclusion of subdivision and residential activity in the Rural zones generally. If there are adverse effects they are not clearly enunciated by the plan.

**Relief Sought:** Delete the provisions.

**Horticulture New Zealand - Participant #: 27 Submission #: 262**

Horticulture NZ does not support the approach to residential dwellings in the rural zones and the requirement for either a discretionary or non-complying consent of more than one dwelling on a title. Such provisions do not provide an adequate framework for provision of dwellings for rural workers. Owners within only one title are disadvantaged.

It has generally been recognised that there may be more than one dwelling on rural properties to service the needs to the property and this should be allowed to continue.

The requirements for dwelling house for dependent relatives are draconian and unworkable.

The approach seems based on "lifestyle" development being "residential" but this overlooks the fact there is a need for residences for rural workers. If the focus is on lifestyle type residences that should be stated. Residences that service the rural sector are not usually considered incompatible with the rural environment. There is no distinction between lifestyle type activity and that necessary for the rural productive sector.

**Relief Sought:** Delete the last paragraph beginning "Given that there has been an historical expectation..."

**Hyson, Michael - Participant #: 80 Submission #: 1089**

Object to statement at the end of the first paragraph that noise "should be accepted as anticipated components of rural amenity values."

**Relief Sought:** Replace "noise" in the second to last sentence of the first paragraph in the explanation with "day time noise".

**N Z Institute of Surveyors - Participant #: 3 Submission #: 48**

In regard to the second paragraph, factory farming and intensive livestock activities that occur are very limited and cover a very small area. This is not a reason for affecting subdivision pattern.

In regard to the last new paragraph, there is no expectation if there are no covenants registered on the titles for whatever reason.

**Relief Sought:** 1. Remove the final sentence of paragraph two completely "this can be avoided"  
2. Remove the last new paragraph completely.

**New Zealand Winegrowers - Participant #: 39 Submission #: 405**

It is inappropriate that the plan recognise that residential development occur on a planned basis and that the effects of the residential/rural interface be minimised by ensuring there are adequate buffer areas between rural activities and residential activities. It is appropriate for the plan to expressly provide for buffer zones between rural zones and residential zones and to provide alternative or additional methods of reducing any adverse effects at the residential/urban interface, including no build to no complaints covenants.

It is inappropriate that the plan provide for rights for dependent relatives in the rural zone only for the reasons set out on policy 2.7. The provision also fails to identify the "adverse cumulative effects" the explanatory paragraph is concerned with.

**Relief sought:** 1. Amend the last sentence of paragraph 3 to read: "Provided that these activities do not result in adverse environmental effects, when considered in relation to their location, the Council considers that they should be accepted as anticipated components of rural amenity values."  
2. In the fourth paragraph, delete the reference at the end of the sentence to "waste disposal methods".  
3. In the fifth paragraph, either delete the last sentence of the explanation or in the alternative, identify the adverse cumulative effects the variation is seeking to prevent.  
4. In the last retained paragraph amend the first sentence by adding to the end the words: "subject to the preference for retention of versatile soils for productive uses in that zone."  
5. In the last retained paragraph, delete the penultimate sentence which reads "the policies reinforce this expectation by ensuring that it is not prevented by such mechanisms as 'no build covenants'".  
6. Amend the wording of the final sentence of the final paragraph to read: "Allow for homestay rights associated with Rural Residential activity, and for temporary residential activity."

**Nicholls, K M & N P - Participant #: 220 Submission #: 5409**

The last paragraph will limit legitimate options open to owners of land (e.g. forestry).

**Relief Sought:** Delete the following words: "the policies reinforce this expectation by ensuring that it is not prevented by such mechanisms as no build covenants."

**Otuwhero Estate Limited - Participant #: 7 Submission #: 134**

The provision is misconceived - whilst using a lot of words the meaning is unclear. The provisions appear to be a build up to the preclusion of subdivision and residential activity in the Rural zones generally. If there are adverse effects they are not clearly enunciated by the plan.

**Relief Sought:** Delete the provisions.

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28 Submission #: 301**

Amend the last sentence.

**Relief Sought:** Amend the last sentence of the explanation to read: "The policies are aimed at enabling a range of activities to occur while ensuring that any adverse cumulative effects on amenity and landscape of the Wairau Plain are avoided."

**Sherwood, Nancy - Participant #: 61 Submission #: 508**

A few examples need further research / mitigation: diminishing availability of potable water; higher than average asthma rates; sprays; higher than average cancer and hay fever rates; bird bangers; frost protection (noise); smoke; contamination; speed and spread of development.

**Relief Sought:** A few examples need further research / mitigation: diminishing availability of potable water; higher than average asthma rates; sprays; higher than average cancer and hay fever rates; bird bangers; frost protection (noise); smoke; contamination; speed and spread of



**Weyerhaeuser New Zealand Limited - Participant #: 84 Submission**

**Relief Sought:** Add the word "forestry" in the explanation third line as follows: "However, a wide range of activities occur in the rural areas, including viticulture, forestry, traditional livestock..."

**V1-12.2.2.2.4 - Rural Environments, new policy 12.2.2.2.4****H & J Meyers Partnership - Participant #: 2 Submission #: 4**

This proposed section severely limits development and small scale rural subdivision in rural areas - including limiting additional dwellings on rural/urban titles. Halting the convenience of workers to be accommodated close by their work place.

**Relief Sought:** Remove policy

**Marris, John & Alison - Participant #: 234 Submission #: 5507**

Support policy. This policy appropriately restrains residential development within the plain and issue was further fragmentation does not occur.

**Relief Sought:** Accept the proposed amendments.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 44**

There will always have to be an interface between Rural 3 and residential zoned areas. There are a large number of people residing on the perimeter of these areas where they adjoin rural activities and there is no conflict.

**Relief Sought:** Remove policy 2.4 completely.

**New Zealand Winegrowers - Participant #: 39 Submission #: 399**

NZ Winegrowers supports policy in part. Policy 2.4 should expressly acknowledge the importance of rural activities and the full utilisation of productive capacity of soils in the Rural 3 zone.

**Relief Sought:** Amend policy to read: "Take into account the potential for amenity conflict between the Rural 3 zone and the urban limits of Blenheim and Renwick while recognising the importance of utilising the productive capacity of soils in the rural zone."

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6514****Hadley Reese Partnership - Participant #: 66 Submission #: 6595****Hadley, J A & J P - Participant #: 63 Submission #: 569****J A Hadley Family Trust - Participant #: 68 Submission #: 6789****Tu Jaes Trust - Participant #: 64 Submission #: 6459****Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6707****Wharehunga Forestry Limited - Participant #: 69 Submission #: 6837****Wharehunga Trust - Participant #: 70 Submission #: 6921**

Unnecessary focus on conflict in the rural/urban interface without specifying type or effect of

**Relief Sought:** Reword policies to address this submission.

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

This policy cannot be allowed in Rural 4. Worker accommodation should be on site.

**Relief Sought:** None specified

**V1-12.2.2.2.5 - Rural Environments, new policy 12.2.2.2.5****Bowen, D A W - Participant #: 222 Submission #: 5414**

Family often require more than one residential dwelling on a family owned rural title. The proposed wording would limit legitimate options open to extended family members.

**Relief Sought:** Delete policy 2.5, or replace the words "dwelling unit" with "principal dwelling unit."

**Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 238**

Federated Farmers disagrees with this policy. Amenity conflict cannot be effectively dealt with by constraining residential activity. With only one dwelling per title rural / residential conflict can still arise. The Federation agrees with council's aim of limiting conflict, however council should be addressing the problem specifically, not through other means.

**Relief Sought:** Delete policy 2.5.

**H & J Meyers Partnership - Participant #: 2 Submission #: 5**

This proposed section severely limits development and small scale rural subdivision in rural areas - including limiting additional dwellings on rural/urban titles. Halting the convenience of workers to be accommodated close by their work place. The limitation of one residential dwelling per title will not limit conflict between rural and amenity expectations.

**Relief Sought:** None specified

**Horticulture New Zealand - Participant #: 27 Submission #: 260**

Horticulture NZ does not support the approach to residential dwellings in the rural zones and the requirement for either a discretionary or non-complying consent of more than one dwelling on a title. Such provisions do not provide an adequate framework for provision of dwellings for rural workers. Owners within only one title are disadvantaged.

It has generally been recognised that there may be more than one dwelling on rural properties to service the needs to the property and this should be allowed to continue.

The requirements for dwelling house for dependent relatives are draconian and unworkable.

The approach seems based on "lifestyle" development being "residential" but this overlooks the fact there is a need for residences for rural workers. If the focus is on lifestyle type residences that should be stated. Residences that service the rural sector are not usually considered incompatible with the rural environment. There is no distinction between lifestyle type activity and that necessary for the rural productive sector.

**Relief Sought:** Replace new objective 2.5 with the following: "Enable the provision of adequate housing for the rural productive sector".

**La Plante, Steven - Participant #: 86 Submission #: 1194**

If this policy is implemented in a rigid fashion it will limit and not enhance the rural community. Subdivisions should be considered on their individual merit. A 2ha block with a glasshouse can be an economic family business and an 8ha block with a house and 5 sheep a waste of good land.

**Relief Sought:** None specified

**Marris, John & Alison - Participant #: 234 Submission #: 5508**

Support policy. This policy appropriately restrains residential development within the plain and issue was further fragmentation does not occur.

**Relief Sought:** Accept the proposed amendments.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 45**

Rural and residential amenity expectations do not relate the true picture.

**Relief Sought:** Remove "as a means of limiting conflict between rural and residential amenity expectations"

**New Zealand Winegrowers - Participant #: 39 Submission #: 400**

NZ Winegrowers supports the suggestion in policy 2.5 that it is appropriate to contain the establishment of residential activity within the Rural 3 zone. However, limiting construction of one residential dwelling per title is not an effects-based method of constraining such residential activity. If it is highly likely that individual properties are comprised of a number of titles, it is inappropriate to allow one dwelling per title only. The number of dwellings in the rural zone should not be controlled on this basis as it is not sustainable and contrary to the purpose and principles of the RMA.

It is also inappropriate to prohibit "consent notice provisions or other mechanisms" which may be designed to restrict activities. Such mechanisms are available to property owners under the law and it is not appropriate, nor permitted, to restrict property ownership in this way. Such control is not effects-based and is contrary to the purpose and principles of the RMA.

Mechanisms such as no-build covenants and consent notice conditions are appropriate methods for limiting residential activity and are used widely throughout other regions under the RMA. These are not matters that can, or should be prohibited under the plan.

**Relief Sought:** Amend policy by deleting the words "other than one residential dwelling per title".

**Outer Limits Limited - Participant #: 48 Submission #: 472**

The rational means of accommodating business expansion is to provide it in a planned manner.

**Relief Sought:** Add new policy 2.5 (and renumber the others subsequently) as follows: "2.5 - permit expansion of business activity in key, appropriately planned locations while ensuring that conflicts with rural amenity are either limited or mitigated."

**Gane, Graeme & Raewyn - Participant #: 36 Submission #: 6964**

**Gane, Laurin - Participant #: 37 Submission #: 6969**

**Gane, Nev & Jenni - Participant #: 34 Submission #: 6954**

**Large, Marie - Participant #: 38 Submission #: 6974**

**Large, Matthew - Participant #: 32 Submission #: 6944**

**Marfell, Bridget - Participant #: 33 Submission #: 6949**

**Marfell, T S & J M - Participant #: 42 Submission #: 445**

**Markview Vineyard - Participant #: 29 Submission #: 321**

**Morris, Melanie - Participant #: 30 Submission #: 6939**

**Wratt, Quentin - Participant #: 35 Submission #: 6959**

The inclusion of policy 2.5 is opposed. The correct way to measure any conflict between rural and residential community expectations is not necessarily by limiting the establishment of residential activity, but rather by limiting the activity of subdivision. Not all residential activity within the Rural 3 zone is in conflict between rural and community expectations.

In the context of a family flat or second dwelling for family members, this is not a proliferation of residential activity and accordingly to insert policy to restrict to one dwelling per title is not

**Relief Sought:** Opposed - limit the activity of subdivision.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6577**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6614**

**Hadley, J A & J P - Participant #: 63 Submission #: 5680**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6774**

**Tu Jaes Trust - Participant #: 64 Submission #: 6498**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6659**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6798**

**Wharehunga Trust - Participant #: 70 Submission #: 6881**

Unnecessary focus on conflict in the rural/urban interface without specifying type or effect of

**Relief Sought:** Reword policies to address comments above.

## V1-12.2.2.2.6 - Rural Environments, policy 12.2.2.2.6

### **H & J Meyers Partnership - Participant #: 2 Submission #: 6**

This proposed section severely limits development and small scale rural subdivision in rural areas - including limiting additional dwellings on rural/urban titles. Halting the convenience of workers to be accommodated close by their work place.

**Relief Sought:** Enable the construction of one further residential dwelling per title where a serviceable dwelling site is available on that title.

### **Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6579**

### **Hadley Reese Partnership - Participant #: 66 Submission #: 6605**

### **Hadley, J A & J P - Participant #: 63 Submission #: 5681**

### **J A Hadley Family Trust - Participant #: 68 Submission #: 6780**

### **Tu Jaes Trust - Participant #: 64 Submission #: 6483**

### **Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6654**

### **Wharehunga Forestry Limited - Participant #: 69 Submission #: 6815**

Unnecessary focus on conflict in the rural/urban interface without specifying type or effect of conflict.

**Relief Sought:** Reword policies to address comments above.

## V1-12.2.2.2.6.new - Rural Environments, new policy 12.2.2.2.6

### **Clintondale Trust - Participant #: 23 Submission #: 194**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Amend policy to read: "Enable the construction of one residential dwelling per title, where a serviceable residential dwelling site is identifiable on that title that would as far as possible mitigate the impact of accepted rural activities conducted off the title, and not allow consent notice provisions or other mechanisms to prevent this outcome."

### **Horticulture New Zealand - Participant #: 27 Submission #: 261**

Horticulture NZ does not support the approach to residential dwellings in the rural zones and the requirement for either a discretionary or non-complying consent of more than one dwelling on a title. Such provisions do not provide an adequate framework for provision of dwellings for rural workers. Owners within only one title are disadvantaged.

It has generally been recognised that there may be more than one dwelling on rural properties to service the needs to the property and this should be allowed to continue.

The requirements for dwelling house for dependent relatives are draconian and unworkable.

The approach seems based on "lifestyle" development being "residential" but this overlooks the fact there is a need for residences for rural workers. If the focus is on lifestyle type residences that should be stated. Residences that service the rural sector are not usually considered incompatible with the rural environment. There is no distinction between lifestyle type activity and that necessary for the rural productive sector.

**Relief Sought:** Replace new policy 2.6 with the following: "Ensure adequate mechanisms to address potential for incompatibilities between rural productive activities and rural lifestyle development".

**La Plante, Steven - Participant #: 86 Submission #: 1195**

If this policy is implemented in a rigid fashion it will limit and not enhance the rural community. Subdivisions should be considered on their individual merit. A 2ha block with a glasshouse can be an economic family business and an 8ha block with a house and 5 sheep a waste of good land.

**Relief Sought:** None specified

**Marris, John & Alison - Participant #: 234 Submission #: 5509**

Support policy. This policy appropriately restrains residential development within the plain and issue was further fragmentation does not occur.

**Relief Sought:** Accept the proposed amendments.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 46**

There are many reasons why consent notice provisions or other mechanisms do not allow additional residential dwelling houses being erected on vacant sites is a desired outcome both for the individuals and the community.

**Relief Sought:** Remove "and not allow consent notice provisions or other mechanisms to prevent the

**New Zealand Winegrowers - Participant #: 39 Submission #: 401**

NZ Winegrowers supports the suggestion in policy 2.5 that it is appropriate to contain the establishment of residential activity within the Rural 3 zone. However, limiting construction of one residential dwelling per title is not an effects-based method of constraining such residential activity. If it is highly likely that individual properties are comprised of a number of titles, it is inappropriate to allow one dwelling per title only. The number of dwellings in the rural zone should not be controlled on this basis as it is not sustainable and contrary to the purpose and principles of the RMA.

It is also inappropriate to prohibit "consent notice provisions or other mechanisms" which may be designed to restrict activities. Such mechanisms are available to property owners under the law and it is not appropriate, nor permitted, to restrict property ownership in this way. Such control is not effects-based and is contrary to the purpose and principles of the RMA.

Mechanisms such as no-build covenants and consent notice conditions are appropriate methods for limiting residential activity and are used widely throughout other regions under the RMA. These are not matters than can, or should be prohibited under the plan.

**Relief Sought:** Delete policy

**Nicholls, K M & N P - Participant #: 220 Submission #: 5408**

This will limit legitimate options open to owners of land (for example, purely forestry allotments).

**Relief Sought:** Delete policy 2.6.

**PYG Limited - Participant #: 238 Submission #: 5560**

There are many reasons why a consent notice should be allowed on titles. There should always be a mechanism for consent notes is to be placed on titles.

**Relief Sought:** Delete the following from policy 2.6: "and not allow consent notice provisions for other mechanisms to prevent this outcome."

**Rewood Pass Vineyards - Participant #: 41 Submission #: 440**

Object to this policy enabling the construction of a residential dwelling to one per title as of right/

There should be some flexibility in the policy to cater for the future. No build covenants have their place and should be retained to provide flexibility. No build covenants are useful in limiting effects on existing residential dwellings.

Under the policy there is no scope for subdivision for reasons of economy e.g. boundary adjustment. The proposed alteration is apparently there to pigeon hole people who wish to push the limits of rules. This proposed clause could be used as much as a weapon for the Council not to bother to look at a situation and falling back on the policies rather than looking at the wider

**Relief Sought:** Delete policy

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

This policy cannot be allowed in Rural 4. Worker accommodation should be on site.

**Relief Sought:** None specified

## **V1-12.2.2.2.7 - Rural Environments, new policy 12.2.2.2.7**

### **Clintondale Trust - Participant #: 23 Submission #: 195**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** 1. Amend policy to read: "Allow for homestay rights associated with residential activity, and for temporary activity to meet the needs of dependent relatives, within the constraints of the prescribed definitions of "temporary" and "dependent relatives".

### **H & J Meyers Partnership - Participant #: 2 Submission #: 7**

This proposed section severely limits development and small scale rural subdivision in rural areas - including limiting additional dwellings on rural/urban titles. Halting the convenience of workers to be accommodated close by their work place.

**Relief Sought:** Amend to "Allow for home stay rights associated with residential activity or temporary residential activity".

### **Marris, John & Alison - Participant #: 234 Submission #: 5510**

Support policy. This policy appropriately restrains residential development within the plain and issue was further fragmentation does not occur.

**Relief Sought:** Accept the proposed amendments.

### **New Zealand Winegrowers - Participant #: 39 Submission #: 402**

The policy's reference to "dependent relatives" is subjective and inappropriate. Such conditional use is not effects-based and is contrary to the purpose and principles of the RMA. In addition, it will be virtually impossible for such use to be properly controlled and enforced. The existing policy fails to acknowledge that temporary residential activity, such as homestay, may be compatible use in the rural zone in certain circumstances.



**Relief Sought:** Amend the wording of policy to read: "Allow for homestay rights associated within Rural Residential activity, and for temporary residential activity."

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6552**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6603**

**Hadley, J A & J P - Participant #: 63 Submission #: 5682**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6764**

**Tu Jaes Trust - Participant #: 64 Submission #: 6493**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6684**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6818**

**Wharehunga Trust - Participant #: 70 Submission #: 6892**

Unnecessary focus on conflict in the rural/urban interface without specifying type or effect of

**Relief Sought:** Reword policies to address comments above.

### **V1-12.2.2.2.8 - Rural Environments, new policy 12.2.2.2.8**

**Blenheim Backpackers Collective - Participant #: 78 Submission #: 1083**

Blenheim Backpackers Collective supports policy 2.8. Workers require services that are best provided in the urban area such as banks, retail and entertainment. Also will assist in the maintenance of rural amenity values.

**Relief Sought:** Support

**Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 239**

Federated Farmers reiterates concerns in relation to worker accommodation on farms. Workers who are required to service rural activities should have the option of living on the farm. It is uneconomical to travel the sometimes long distances from the nearest town, and due to the nature of the work, long hours and/or odd hours make living in town unfeasible. This travel by workers also has the potential to compromise the safety of the road network.

This policy is inaccurate as worker accommodation has not exclusively been provided for within urban-township areas in the past. This is deceptive and to claim that this type of accommodation will "continue to be provided for within urban/township areas" is misleading.

**Relief Sought:** 1. Amend new policy 2.8 to read: "Ensure accommodation for permanent farm employees required to service rural activities continues to be provided for on farm, with optional accommodation also available in urban/township areas."

**H & J Meyers Partnership - Participant #: 2 Submission #: 8**

This proposed section severely limits development and small scale rural subdivision in rural areas - including limiting additional dwellings on rural/urban titles. Halting the convenience of workers to be accommodated close by their work place.

**Relief Sought:** Remove

**Horticulture New Zealand - Participant #: 27 Submission #: 253**

Horticulture NZ recognises there are issues associated with provision of workers accommodation, especially seasonal workers. However, the measures which are introduced in variation 38 are draconian and unworkable as not all workers accommodation is of a temporary nature and can be accommodated in urban locations with workers travelling to the workplace. Linked with restriction on residential dwellings on Rural 3 and 4 means that provision of housing for farm and orchard staff will be very difficult.

A more flexible regime is needed to provide accommodation.

There are two requirements for workers accommodation: seasonable workers temporary accommodation and; housing for permanent workers.

While some reasonable workers accommodation may be provided in urban locations, there are situations where it is appropriate that the accommodation is on site or in the rural area.

The variation suggests that workers accommodation is located in townships and that travel times are short. This is not necessarily the situation and does not reflect the diversity of need.

**Relief Sought:** Replace new policy 2.8 with the following: "Ensure a flexible framework to enable workers accommodation to be provided for the rural productive sector in the rural zones."

**Marris, John & Alison - Participant #: 234 Submission #: 5511**

Support policy. This policy appropriately restrains residential development within the plain and issue of further fragmentation does not occur.

**Relief Sought:** Accept the proposed amendments.

**New Zealand Winegrowers - Participant #: 39 Submission #: 403**

NZ Winegrowers opposes the policy to the extent that it fails to provide for worker accommodation to be located on site due to seasonal requirements, or due to the proximity of town centres to remote areas, or where such accommodation can easily be accommodated on site in an existing

**Relief Sought:** Amend policy by inserting the following at the end: "...subject to seasonal requirements or where a town centre is not in close proximity to a site or where such accommodation can be accommodated on site in an existing structure."

**Rewood Pass Vineyards - Participant #: 41 Submission #: 441**

Oppose this policy in its entirety. The comment "worker accommodation is generally expected to continue to be provided for within urban township zones" is without merit. There is no reason that suitable, non-temporary worker accommodation cannot be built on vineyards or in rural areas particularly in the Awatere Valley and south of it. Adopting this policy gives the Council the rule book right to throw out any sensible application that meets the rest of the plan equipment. This policy is short on lateral thinking and appears to be to remove a perceived problem rather than investigate the proposal and check that measures are in place to deal with it.

**Relief Sought:** Delete policy in its entirety.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6561**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6607**

**Hadley, J A & J P - Participant #: 63 Submission #: 5683**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6760**

**Tu Jaes Trust - Participant #: 64 Submission #: 6484**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6680**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6811**

**Wharehunga Trust - Participant #: 70 Submission #: 6867**

Unnecessary focus on conflict in the rural/urban interface without specifying type or effect of conflict.

Policy effectively prohibiting provision of workers accommodation in rural areas, but no objectives or

**Relief Sought:** Reword policies to address comments above.

**Alexander, M G et al. (See Appendix 1 for the full list of submitters requesting this relief).**

This policy cannot be allowed in Rural 4. Worker accommodation should be on site.

**Relief Sought:** None specified

## V1-12.2.2.2.9 - Rural Environments, new policy 12.2.2.2.9

### Clintondale Trust - Participant #: 23 Submission #: 196

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Amend policy to read: "Ensure that the patterns of small-scale rural subdivision and related residential development are not located where:

- rural amenity values of openness or the potential of versatile soils will be adversely affected or
- the potential for conflict between residential and neighbouring rural activities will be created, or

### H & J Meyers Partnership - Participant #: 2 Submission #: 9

This proposed section severely limits development and small scale rural subdivision in rural areas - including limiting additional dwellings on rural/urban titles, Halting the convenience of workers to be accommodated close by their work place.

**Relief Sought:** Amend as follows "...-rural amenity values will be adversely affected; or -the potential for conflict between residential and neighbouring rural activities could be

### La Plante, Steven - Participant #: 86 Submission #: 1196

If this policy is implemented in a rigid fashion it will limit and not enhance the rural community. Subdivisions should be considered on their individual merit. A 2ha block with a glasshouse can be an economic family business and an 8ha block with a house and 5 sheep a waste of good land.

**Relief Sought:** None specified

### Marris, John & Alison - Participant #: 234 Submission #: 5512

Support policy. This policy appropriately restrains residential development within the plain and issue was further fragmentation does not occur.

**Relief Sought:** Accept the proposed amendments.

### Monk, Craig & Jo - Participant #: 72 Submission #: 1010

Oppose this policy as it is inappropriate. It will stifle rural development, subdivisions and housing.

**Relief Sought:** Delete policy.

### N Z Institute of Surveyors - Participant #: 3 Submission #: 47

The potential conflict between residents and neighbouring rural activities does not necessarily increase.

**Relief Sought:** Remove policy completely.

### New Zealand Winegrowers - Participant #: 39 Submission #: 404

NZ Winegrowers supports the inclusion of policy 2.9 in part. It is appropriate to ensure that patterns of small scale rural subdivision and residential development are not located where the potential for conflict between residential and neighbouring rural activities will be increased.

**Relief Sought:** Amend the bullet points in policy to read:  
 "- rural amenity values of openness, or the potential productive capacity of versatile soils, will be adversely affected; or  
 - the potential for conflict between residential and neighbouring rural activities will be created, or where they already exist, be exacerbated."

**Transpower New Zealand Limited - Participant #: 25 Submission #: 224**

Subdivision is often undertaken near transmission lines, which leads to living and working environments with reduced amenities, as well as

**Relief Sought:** Add the following new bullet point at the end of new policy 2.9: "They will compromise the integrity of the National Grid"

**Williams, Peter & Dianne - Participant #: 71 Submission #: 1006**

Oppose this policy as it is inappropriate. It will stifle rural development, subdivisions and housing.

**Relief Sought:** Delete policy.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6571**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6593**

**Hadley, J A & J P - Participant #: 63 Submission #: 5684**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6785**

**Tu Jaes Trust - Participant #: 64 Submission #: 6506**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6664**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6812**

**Wharehunga Trust - Participant #: 70 Submission #: 6872**

Unnecessary focus on conflict in the rural/urban interface without specifying type or effect of

**Relief Sought:** Reword policies to address comments above.

## **V1-12.2.2.2-gen - Rural Environments, 12.2.2.2, general**

**E D Townley Limited - Participant #: 85 Submission #: 1159**

The policies create the impression that conflict in the rural zone is endemic with the residential zones. That is not so. Reference is made to "serviceable residential dwelling site" - what does what mean? Fully reticulated? If so that provision will create an unnecessary constraint on the Rural zones.

Workers accommodation should be created in the circumstance and locations where it is needed.

The policies in combination seek to block any form of residential development in the Rural 3 zone, but relate to all Rural zones in effect so the consequences are far greater.

**Relief Sought:** Delete the policies proposed and clarify to ensure that rural activities includes accommodation as a permitted activity.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 133**

The policies create the impression that conflict in the rural zone is endemic with the residential zones. That is not so. Reference is made to "serviceable residential dwelling site" - what does what mean? Fully reticulated? If so that provision will create an unnecessary constraint on the Rural zones.

Workers accommodation should be created in the circumstance and locations where it is needed.

The policies in combination seek to block any form of residential development in the Rural 3 zone, but relate to all Rural zones in effect so the consequences are far greater.

**Relief Sought:** Delete the policies proposed and clarify to ensure that rural activities includes accommodation as a permitted activity.

### V1-12.2.2.3 - Rural Environments, new objective 12.2.2.3

#### **Assets & Services Department Staff MDC - Participant #: 215 Submission #:**

This submission seeks to build on the intended policy outcomes, not detract from them, while acknowledging the Wairau Plain is a highly modified environment. The addition of the word "recognise" is a call to awareness.

The phrase "where sustainable" is a qualifier which imparts a test on those that operate in and/or use the environment. It acknowledges that within the drainage network, proposals to enhance conservation or ecological values may compromise the performance of existing resource management systems. The phrase "where sustainable" does not imply a prohibition. It is a test of sustainability before any active enhancement is undertaken which may impact on existing systems or practices.

**Relief Sought:** Amend new objective 3 to read: "Recognise, maintain and where sustainable, enhance ecological values with particular emphasis on indigenous biodiversity."

#### **Department of Conservation - Participant #: 229 Submission #: 5437**

Department supports new objective. Will provide better guidance for assessing resource consent applications.

**Relief Sought:** Retain objective 3.

#### **Fitzgerald, Roger Myers - Participant #: 225 Submission #: 5420**

This submission seeks to build on the intended policy outcomes, not detract from them. The addition of the word "recognise" is a call to discover or realise the nature of. To be informed provides for a better understanding of the options and consequences that making choices has on the environment.

The phrase "where sustainable" is a qualifier which in the absence of methods or rules, imparts a test on those that operate in and/or use the environment. The phrase "where sustainable" does not imply a prohibition. It is a test of sustainability before any active enhancement is undertaken

**Relief Sought:** Amend new objective 3 to read: "Recognise, maintain and where sustainable, enhance ecological values with particular emphasis on indigenous biodiversity."

#### **Royal Forest & Bird Protection Society of New Zealand - Participant #: 28**

##### **Submission #: 303**

Support.

**Relief Sought:** Support

#### **Sherwood, Nancy - Participant #: 61 Submission #: 509**

Habitat destruction is rampant. The threat to birds is even more serious now that the Wairau River is under threat.

**Relief Sought:** None specified

#### **TrustPower Limited - Participant #: 10 Submission #: 170**

The proposed objective and policies lack sufficient balance. It is not appropriate to introduce a strong protection and enhancement focus on the waterways of the Wairau Valley simply because adjacent land use practices have eroded biodiversity values. Any endeavour should be based on appropriate and objective assessment of the true biodiversity value of the waterways.

Such an approach will unduly restrict the use of the valley's waterways for electricity generation. The Wairau scheme is of significant importance to the social, economic and cultural well-being of the district. The overall benefits of scheme might well outweigh adverse effects.

In addition, some man made waterways are developed and maintained in such a way as to be functional rather than important for biodiversity values.

The proposed objective and policies fail to appropriately recognise the importance of the watercourses as a resource for hydropower generation.

**Relief Sought:** Delete proposed objective 3.

**Witherhills Vineyards Marlborough Limited - Participant #: 77 Submission #:**

Need to address the deteriorating position of surety of water supplies. What must take place is a more proactive manner of water management that allows surety of supply while maintaining the ecosystems of the province.

**Relief Sought:** 1. Amend the first sentence (existing objective 3) to read: "To maintain and enhance the life supporting capacity of the soils and quality and surety of supply of surface and groundwater."

2. Amend existing policy 3.5 to read: "To ensure that regard is given...of ecosystems, carefully balancing this with surety of supply to water users, when considering resource consents."

3. Address any other rules, objectives, policies and methods that will affect the surety of water supply to users dependent on such supplies.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6541**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6583**

**Hadley, J A & J P - Participant #: 63 Submission #: 570**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6738**

**Tu Jaes Trust - Participant #: 64 Submission #: 6455**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6692**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6836**

**Wharehunga Trust - Participant #: 70 Submission #: 6936**

Support objective 3 and the explanation.

**Relief Sought:** None specified

### **V1-12.2.2.3.1 - Rural Environments, new policy 12.2.2.3.1**

**Assets & Services Department Staff MDC - Participant #: 215 Submission #:**

This submission seeks to build on the intended policy outcomes, not detract from them, while acknowledging the Wairau Plain is a highly modified environment. The addition of the word "recognise" is a call to awareness.

The phrase "where sustainable" is a qualifier which imparts a test on those that operate in and/or use the environment. It acknowledges that within the drainage network, proposals to enhance conservation or ecological values may compromise the performance of existing resource management systems. The phrase "where sustainable" does not imply a prohibition. It is a test of sustainability before any active enhancement is undertaken which may impact on existing systems or practices.

**Relief Sought:** Amend policy 3.1 to read: "Recognise, promote and support opportunities to retain and where sustainable, enhance both the aquatic and terrestrial ecological values, and to maximise the opportunities that involve indigenous biodiversity."

**Department of Conservation - Participant #: 229 Submission #: 5438**

Department supports new policy. Will provide better guidance for assessing resource consent applications.

Policy could be reworded in a manner that provides clearer guidance that council will encourage opportunities to enhance indigenous biodiversity values.

**Relief Sought:** Amend policy 3.1 as follows: "Promote and support opportunities to retain and enhance both aquatic and terrestrial ecological values, in particular indigenous biodiversity."

**Fitzgerald, Roger Myers - Participant #: 225 Submission #: 5421**

This submission seeks to build on the intended policy outcomes, not detract from them. The



addition of the word "recognise" is a call to discover or realise the nature of. To be informed provides for a better understanding of the options and consequences that making choices has on the environment.

The phrase "where sustainable" is a qualifier which in the absence of methods or rules, imparts a test on those that operate in and/or use the environment. The phrase "where sustainable" does not imply a prohibition. It is a test of sustainability before any active enhancement is undertaken

**Relief Sought:** Amend policy 3.1 to read: "Recognise, promote and support opportunities to retain and where sustainable, enhance both the aquatic and terrestrial ecological values, and to maximise the opportunities that involve indigenous biodiversity."

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28**

**Submission #: 5691**

Support

**Relief Sought:** Support

**Sherwood, Nancy - Participant #: 61 Submission #: 510**

The impact of sprays, loss of trees and possibly the Wairau River does not do this. Should have a riparian strip corridor linking Cloudy bay up the Wairau through to Nelson Lakes and Kahurangi National Parks.

**Relief Sought:** None specified

**TrustPower Limited - Participant #: 10 Submission #: 5621**

It is not appropriate to introduce a strong protection and enhancement focus on the waterways of the Wairau Valley simply because adjacent land use practices have eroded biodiversity values. Any endeavour should be based on appropriate and objective assessment of the true biodiversity value of the waterways.

Such an approach will unduly restrict the use of the valley's waterways for electricity generation. The very absolute wording of new issue 12.2.1.5 could preclude such schemes from being developed. The Wairau scheme is of significant importance to the social, economic and cultural well-being of the district. The overall benefits of scheme might well outweigh adverse effects.

In addition, some man made waterways are developed and maintained in such a way as to be functional rather than important for biodiversity values.

**Relief Sought:** Delete proposed policy 3.1

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6560**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6586**

**Hadley, J A & J P - Participant #: 63 Submission #: 6524**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6793**

**Tu Jaes Trust - Participant #: 64 Submission #: 6509**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6679**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6813**

**Wharehunga Trust - Participant #: 70 Submission #: 6918**

Support

**Relief Sought:** Support

## **V1-12.2.2.3.2 - Rural Environments, new policy 12.2.2.3.2**

**Assets & Services Department Staff MDC - Participant #: 215 Submission #:**

This submission seeks to build on the intended policy outcomes, not detract from them, while

acknowledging the Wairau Plain is a highly modified environment. The addition of the word "recognise" is a call to awareness.

The phrase "where sustainable" is a qualifier which imparts a test on those that operate in and/or use the environment. It acknowledges that within the drainage network, proposals to enhance conservation or ecological values may compromise the performance of existing resource management systems. The phrase "where sustainable" does not imply a prohibition. It is a test of sustainability before any active enhancement is undertaken which may impact on existing systems or practices.

**Relief Sought:** Amend policy 3.2 to read: "Recognise, safeguard and where sustainable, enhance the nature conservation values of riparian margins, and associated ecosystems.

**Department of Conservation - Participant #: 229 Submission #: 5439**

Department supports new policy. Will provide better guidance for assessing resource consent applications.

**Relief Sought:** Retain policy 3.2.

**Fitzgerald, Roger Myers - Participant #: 225 Submission #: 5422**

This submission seeks to build on the intended policy outcomes, not detract from them. The addition of the word "recognise" is a call to discover or realise the nature of. To be informed provides for a better understanding of the options and consequences that making choices has on the environment.

The phrase "where sustainable" is a qualifier which in the absence of methods or rules, imparts a test on those that operate in and/or use the environment. The phrase "where sustainable" does not imply a prohibition. It is a test of sustainability before any active enhancement is undertaken

**Relief Sought:** Amend policy 3.2 to read: "Recognise, safeguard and where sustainable, enhance the nature conservation values of riparian margins, and associated ecosystems.

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28 Submission #: 5692**

Support

**Relief Sought:** Support

**TrustPower Limited - Participant #: 10 Submission #: 5622**

It is not appropriate to introduce a strong protection and enhancement focus on the waterways of the Wairau Valley simply because adjacent land use practices have eroded biodiversity values. Any endeavour should be based on appropriate and objective assessment of the true biodiversity value of the waterways.

Such an approach will unduly restrict the use of the valley's waterways for electricity generation. The very absolute wording of new issue 12.2.1.5 could preclude such schemes from being developed. The Wairau scheme is of significant importance to the social, economic and cultural well-being of the district. The overall benefits of scheme might well outweigh adverse effects.

In addition, some man made waterways are developed and maintained in such a way as to be functional rather than important for biodiversity values.

**Relief Sought:** Delete proposed policy 3.2

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6567**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6632**

**Hadley, J A & J P - Participant #: 63 Submission #: 5625**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6743**

**Tu Jaes Trust - Participant #: 64 Submission #: 6457**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6666**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6820**

**Wharehunga Trust - Participant #: 70 Submission #: 6923**

Support

**Relief Sought:** Support

### **V1-12.2.2.3.3 - Rural Environments, new policy 12.2.2.3.3**

**Assets & Services Department Staff MDC - Participant #: 215 Submission #:**

This submission seeks to build on the intended policy outcomes, not detract from them, while acknowledging the Wairau Plain is a highly modified environment. The addition of the word "recognise" is a call to awareness.

The phrase "where sustainable" is a qualifier which imparts a test on those that operate in and/or use the environment. It acknowledges that within the drainage network, proposals to enhance conservation or ecological values may compromise the performance of existing resource management systems. The phrase "where sustainable" does not imply a prohibition. It is a test of sustainability before any active enhancement is undertaken which may impact on existing systems or practices.

**Relief Sought:** Amend policy 3.3 to read: "Recognise and where sustainable, enhance the functioning of the drainage network as ecological and habitat corridors."

**Department of Conservation - Participant #: 229 Submission #: 5440**

Department supports new policy. Will provide better guidance for assessing resource consent applications. Policy is especially welcome recognition of opportunities to enhance natural values of modified drainage works.

**Relief Sought:** Retain policy 3.3.

**Federated Farmers (Blenheim Branch) - Participant #: 241 Submission**

We have serious concerns with the emphasis placed on the ecological and habitat functions within the drainage system in this policy. Habitats can not have predominance over the network's primary function that is efficient land drainage.

**Relief Sought:** Amend policy 3.3 to read: "Council recognises the primary function of the drainage network is to provide efficient land drainage. The drainage network can be enhanced as ecological and habitat corridors if appropriate."

**Fitzgerald, Roger Myers - Participant #: 225 Submission #: 5423**

This submission seeks to build on the intended policy outcomes, not detract from them. The addition of the word "recognise" is a call to discover or realise the nature of. To be informed provides for a better understanding of the options and consequences that making choices has on the environment.

The phrase "where sustainable" is a qualifier which in the absence of methods or rules, imparts a test on those that operate in and/or use the environment. The phrase "where sustainable" does not imply a prohibition. It is a test of sustainability before any active enhancement is undertaken

**Relief Sought:** Amend policy 3.3 to read: "Recognise and where sustainable, enhance the functioning of the

drainage network as ecological and habitat corridors.

**Rose, Peter Wallis - Participant #: 50 Submission #: 487**

The policy seems very wide ranging and lacks detail on how enhancement is going to be achieved.

I have concerns about this policy impeding the maintenance of the drainage network e.g. weed spraying. The drainage network is vital for the lower drains. I oppose this policy in its present

*Relief Sought:* Oppose

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28  
Submission #: 5693**

Support

*Relief Sought:* Support

**TrustPower Limited - Participant #: 10 Submission #: 5623**

It is not appropriate to introduce a strong protection and enhancement focus on the waterways of the Wairau Valley simply because adjacent land use practices have eroded biodiversity values. Any endeavour should be based on appropriate and objective assessment of the true biodiversity value of the waterways.

Such an approach will unduly restrict the use of the valley's waterways for electricity generation. The very absolute wording of new issue 12.2.1.5 could preclude such schemes from being developed. The Wairau scheme is of significant importance to the social, economic and cultural well-being of the district. The overall benefits of scheme might well outweigh adverse effects.

In addition, some man made waterways are developed and maintained in such a way as to be functional rather than important for biodiversity values.

*Relief Sought:* Delete proposed policy 3.3

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6570**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6621**

**Hadley, J A & J P - Participant #: 63 Submission #: 5687**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6741**

**Tu Jaes Trust - Participant #: 64 Submission #: 6453**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6665**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6806**

**Wharehunga Trust - Participant #: 70 Submission #: 6915**

Support

*Relief Sought:* Support

**V1-12.2.2.4 - Rural Environments, new objective 12.2.2.4**

**E D Townley Limited - Participant #: 85 Submission #: 1161**

"Working rural landscapes" and "retention and development of landscape attributes which are attracted to residents and visitors alike." are not defined and seems to evidence confusion in approach. It is unclear whether it is intended for the provision to relate to the Rural 3 zone or the Rural 4 - as worded the effect will be on both.

*Relief Sought:* Delete the provisions

**Marris, John & Alison - Participant #: 234 Submission #: 5513**

Support objective as it will assist in the retention of rural character of the plain and rural three zone.

**Relief Sought:** Accept the proposed amendments.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 135**

"Working rural landscapes" and "retention and development of landscape attributes which are attracted to residents and visitors alike." are not defined and seems to evidence confusion in approach. It is unclear whether it is intended for the provision to relate to the Rural 3 zone or the Rural 4 - as worded the effect will be on both.

**Relief Sought:** Delete the provisions

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28**

**Submission #: 302**

Support

**Relief Sought:** Support

Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).

This clause is ill defined e.g. how do you enhance natural character?

**Relief Sought:** Delete

### V1-12.2.2.4.1 - Rural Environments, new policy 12.2.2.4.1

**E D Townley Limited - Participant #: 85 Submission #: 1162**

"Working rural landscapes" is not defined and seems to evidence confusion in approach. It is unclear whether it is intended for the provision to relate to the Rural 3 zone or the Rural 4 - as worded the effect will be on both.

**Relief Sought:** Delete new policy 4.1.

**Marris, John & Alison - Participant #: 234 Submission #: 5514**

Support policy as it will assist in the retention of rural character of the plain and rural three zone.

**Relief Sought:** Accept the proposed amendments.

**New Zealand Winegrowers - Participant #: 39 Submission #: 407**

NZ Winegrowers supports policy 4.1 in part and submits that maintenance and enhancement of the landscape values is highly desirable. However it is important that the productive use of soil on the Wairau Plain be maintained. In particular, the landscape values of the Wairau Plain should not be enhanced to the detriment of the productive use of the soil. The reference to third parties is highly subjective and not effects-based.

**Relief Sought:** Amend policy by deleting the words "and development" and "which are attractive to residents and visitors alike".

**Otuwhero Estate Limited - Participant #: 7 Submission #: 136**

"Working rural landscapes" is not defined and seems to evidence confusion in approach. It is unclear whether it is intended for the provision to relate to the Rural 3 zone or the Rural 4 - as worded the effect will be on both.

**Relief Sought:** Delete new policy 4.1.

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28**

**Submission #: 5694**

Support

**Relief Sought:** Support

Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).

This clause is ill defined e.g. how do you enhance natural character?

**Relief Sought:** Delete

### V1-12.2.2.4.2 - Rural Environments, new policy 12.2.2.4.2

**Department of Conservation - Participant #: 229 Submission #: 5441**

Intent of this policy is supported but it is considered that it would benefit from being reworded to reflect natural character objectives and policies in chapter 10.

**Relief Sought:** Amend policy 4.2 as follows: "Maintain and enhance the natural character of the Wairau Plain, in accordance with the objectives and policies in Chapter 10."

**Marris, John & Alison - Participant #: 234 Submission #: 5515**

Support policy as it will assist in the retention of rural character of the plain and rural three zone.

**Relief Sought:** Accept the proposed amendments.

**New Zealand Winegrowers - Participant #: 39 Submission #: 406**

NZ Winegrowers supports policy 4.2 in part and submits that maintenance and enhancement of the landscape values is highly desirable. However it is important that the productive use of soil on the Wairau Plain be maintained. In particular, the landscape values of the Wairau Plain should not be enhanced to the detriment of the productive use of the soil. The reference to third parties is highly subjective and not effects-based.

**Relief Sought:** Amend policy by adding the following words to the end of the policy: "while taking into account the existing productive capacity of the Wairau Plain."

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28**

**Submission #: 5695**

Support

**Relief Sought:** Support

**Sherwood, Nancy - Participant #: 61 Submission #: 511**

What was previously a rich patchwork of diversity is now row upon row of arsenic posts.

**Relief Sought:** None specified

Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).

This clause is ill defined e.g. how do you enhance natural character?

**Relief Sought:** Delete

### V1-12.2.2.4.ex - Rural Environments, 12.2.2.4, explanation

**Marris, John & Alison - Participant #: 234 Submission #: 5516**

Support explanation as it will assist in the retention of rural character of the plain and rural three

**Relief Sought:** Accept the proposed amendments.

### V1-12.2.2.5 - Rural Environments, 12.2.2.5, explanation

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28**

**Submission #: 305**

Amend.

**Relief Sought:** Amend explanation as follows: "Water quality is also integral to the landscape character, indigenous biological diversity, aquatic habitat, healthy functioning of ecosystems, recreation potential, amenity values of the area, and human health."

**Sherwood, Nancy - Participant #: 61 Submission #: 512**

**Relief Sought:** Insert the following: "and health (of the Wairau Plain)".



### V1-12.2.2.5.3 - Rural Environments, policy 12.2.2.5.3

#### Royal Forest & Bird Protection Society of New Zealand - Participant #: 28 Submission #: 304

Oppose the deletion. While the policy may appear to cover matters covered by the new objective and policies, it is important that the retention of the natural character and nature conservation values of riparian margins is recognised under the objective on maintaining and enhancing the life-supporting capacity of soils and the quality of surface and groundwater, as riparian margins are critical to achieving that objective.

**Relief Sought:** Retain policy

### V1-12.2.2.7 - Rural Environments, new objective 12.2.2.7

#### E D Townley Limited - Participant #: 85 Submission #: 1163

These provisions seem to be calculated to enshrine the approach of Transit NZ and its interpretation of the Land Transport Amendment Act in to the Plan. There has clearly been significant input either from Marlborough Roads or from Transit into the plan before its notification, and to allow the plan to remain as proposed within the objectives will impact in a major and adverse way on all of the rural zones.

**Relief Sought:** Delete the provision

#### New Zealand Winegrowers - Participant #: 39 Submission #: 408

NZ Winegrowers supports the provision in part and seeks to ensure that there is no adverse impact on productive (and related) activities in the rural zones.

**Relief Sought:** Add the following to the end of Objective 7: "...without adversely affecting primary production activities,"

#### Otuwhero Estate Limited - Participant #: 7 Submission #: 137

These provisions seem to be calculated to enshrine the approach of Transit NZ and its interpretation of the Land Transport Amendment Act in to the Plan. There has clearly been significant input either from Marlborough Roads or from Transit into the plan before its notification, and to allow the plan to remain as proposed within the objectives will impact in a major and adverse way on all of the rural zones.

**Relief Sought:** Delete the provision

### V1-12.2.2.7.1 - Rural Environments, new policy 12.2.2.7.1

#### E D Townley Limited - Participant #: 85 Submission #: 5648

These provisions seem to be calculated to enshrine the approach of Transit NZ and its interpretation of the Land Transport Amendment Act in to the Plan. There has clearly been significant input either from Marlborough Roads or from Transit into the plan before its notification, and to allow the plan to remain as proposed within the objectives will impact in a major and adverse way on all of the rural zones.

**Relief Sought:** Delete the provision

#### Otuwhero Estate Limited - Participant #: 7 Submission #: 5653

These provisions seem to be calculated to enshrine the approach of Transit NZ and its interpretation of the Land Transport Amendment Act in to the Plan. There has clearly been significant input either from Marlborough Roads or from Transit into the plan before its notification, and to allow the plan to remain as proposed within the objectives will impact in a major and adverse way on all of the rural zones.

**Relief Sought:** Delete the provision

### V1-12.2.2.7.2 - Rural Environments, new policy 12.2.2.7.2

#### E D Townley Limited - Participant #: 85 Submission #: 5649

These provisions seem to be calculated to enshrine the approach of Transit NZ and its

interpretation of the Land Transport Amendment Act in to the Plan. There has clearly been significant input either from Marlborough Roads or from Transit into the plan before its notification, and to allow the plan to remain as proposed within the objectives will impact in a major and adverse way on all of the rural zones.

**Relief Sought:** Delete the provision

**N Z Institute of Surveyors - Participant #: 3 Submission #: 49**

There are some activities that are necessary to be located adjacent to arterial roads and State Highways. It would be a sad indictment if all such activities were located on back roads where it would be difficult for tourists to find. Marlborough has in many cases limited side roads where alternative access is available.

**Relief Sought:** Remove policy completely.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 5654**

These provisions seem to be calculated to enshrine the approach of Transit NZ and its interpretation of the Land Transport Amendment Act in to the Plan. There has clearly been significant input either from Marlborough Roads or from Transit into the plan before its notification, and to allow the plan to remain as proposed within the objectives will impact in a major and adverse way on all of the rural zones.

**Relief Sought:** Delete the provision

**Sherwood, Nancy - Participant #: 61 Submission #: 513**

Council should be wary of voiding existing "paper roads" as they could be costly to reinstate to meet future needs. Limiting growth is a means of diminishing environmental damage.

**Relief Sought:** None specified

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

**Relief Sought:** Replace policy 7.2 with: "manage the development of Rural 3 and 4 roading to enhance subdivision and land development by creating and enlarging roading."

### **V1-12.2.2.7.3 - Rural Environments, new policy 12.2.2.7.3**

**E D Townley Limited - Participant #: 85 Submission #: 5650**

These provisions seem to be calculated to enshrine the approach of Transit NZ and its interpretation of the Land Transport Amendment Act in to the Plan. There has clearly been significant input either from Marlborough Roads or from Transit into the plan before its notification, and to allow the plan to remain as proposed within the objectives will impact in a major and adverse way on all of the rural zones.

**Relief Sought:** Delete the provision

**Otuwhero Estate Limited - Participant #: 7 Submission #: 5655**

These provisions seem to be calculated to enshrine the approach of Transit NZ and its interpretation of the Land Transport Amendment Act in to the Plan. There has clearly been significant input either from Marlborough Roads or from Transit into the plan before its notification, and to allow the plan to remain as proposed within the objectives will impact in a major and adverse way on all of the rural zones.

**Relief Sought:** Delete the provision

### **V1-12.2.2.7.4 - Rural Environments, new policy 12.2.2.7.4**

**Clintondale Trust - Participant #: 23 Submission #: 199**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic

environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Amend policy to read: "Use the limited access road provisions of the Local Government Act to provide certainty of outcome for the integrity of the arterial road network in the zone without negatively impacting upon essential primary production activities."

**E D Townley Limited - Participant #: 85 Submission #: 5651**

These provisions seem to be calculated to enshrine the approach of Transit NZ and its interpretation of the Land Transport Amendment Act in to the Plan. There has clearly been significant input either from Marlborough Roads or from Transit into the plan before its notification, and to allow the plan to remain as proposed within the objectives will impact in a major and adverse way on all of the rural zones.

**Relief Sought:** Delete the provision

**New Zealand Winegrowers - Participant #: 39 Submission #: 409**

NZ Winegrowers is concerned to ensure that use of limited access roads does not unduly restrict productive (and related) activities in the rural zones.

**Relief Sought:** Add the following words to the end of policy 7.4: "...without adversely affecting primary production activities."

**Otuwhero Estate Limited - Participant #: 7 Submission #: 5656**

These provisions seem to be calculated to enshrine the approach of Transit NZ and its interpretation of the Land Transport Amendment Act in to the Plan. There has clearly been significant input either from Marlborough Roads or from Transit into the plan before its notification, and to allow the plan to remain as proposed within the objectives will impact in a major and adverse way on all of the rural zones.

**Relief Sought:** Delete the provision

**V1-12.2.2.7.5 - Rural Environments, new policy 12.2.2.7.5**

**E D Townley Limited - Participant #: 85 Submission #: 6997**

These provisions seem to be calculated to enshrine the approach of Transit NZ and its interpretation of the Land Transport Amendment Act in to the Plan. There has clearly been significant input either from Marlborough Roads or from Transit into the plan before its notification, and to allow the plan to remain as proposed within the objectives will impact in a major and adverse way on all of the rural zones.

**Relief Sought:** Delete the provision

**Otuwhero Estate Limited - Participant #: 7 Submission #: 5661**

These provisions seem to be calculated to enshrine the approach of Transit NZ and its interpretation of the Land Transport Amendment Act in to the Plan. There has clearly been significant input either from Marlborough Roads or from Transit into the plan before its notification, and to allow the plan to remain as proposed within the objectives will impact in a major and adverse way on all of the rural zones.

**Relief Sought:** Delete the provision

### **V1-12.2.2.7.ex - Rural Environments, 12.2.2.7, explanation**

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6533**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6642**

**Hadley, J A & J P - Participant #: 63 Submission #: 571**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6731**

**Tu Jaes Trust - Participant #: 64 Submission #: 6450**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6706**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6828**

**Wharehunga Trust - Participant #: 70 Submission #: 6928**

Using the term "appropriate subdivision" indicates that subdivision occurring anywhere else other than local roads will be considered inappropriate. Not effects based and does not recognise mitigation.

**Relief Sought:** Remove last sentence of explanation.

### **V1-12.2.3 - Rural Environments, 12.2.3 Methods, Rules**

**Bowen, D A W - Participant #: 222 Submission #: 5415**

Family often require more than one residential dwelling on a family owned rural title. The proposed wording would limit legitimate options open to extended family members.

**Relief Sought:** Delete the new addition starting "plan rules will limit residential density...", or replace the words "dwelling unit" with "principal dwelling unit."

**E D Townley Limited - Participant #: 85 Submission #: 1164**

The plan states "plan rules will control subdivision to protect the rural environment". People are part of the rural environment, their housing is part of the rural environment. These provisions will impact in a major adverse way on the rural environment. The plan focuses far too much on "rural environment" and not enough on the interests of people and communities.

**Relief Sought:** Clarify and refine the provisions to reflect the above.

**Horticulture New Zealand - Participant #: 27 Submission #: 263**

Horticulture NZ does not support the approach to residential dwellings in the rural zones and the requirement for either a discretionary or non-complying consent of more than one dwelling on a title. Such provisions do not provide an adequate framework for provision of dwellings for rural workers. Owners within only one title are disadvantaged.

It has generally been recognised that there may be more than one dwelling on rural properties to service the needs to the property and this should be allowed to continue.

The requirements for dwelling house for dependent relatives are draconian and unworkable.

The approach seems based on "lifestyle" development being "residential" but this overlooks the fact there is a need for residences for rural workers. If the focus is on lifestyle type residences that should be stated. Residences that service the rural sector are not usually considered incompatible with the rural environment. There is no distinction between lifestyle type activity and that necessary for the rural productive sector.

**Relief Sought:** Delete the method starting "Plan rules will limit residential density..."

**New Zealand Winegrowers - Participant #: 39 Submission #: 410**

NZ Winegrowers supports the restriction of residential density in the rural zone to be limited to one dwelling per property only for the reasons outlined in comments on policy 2.5, 2.6 and 12.2.2.

Within the rural zone, it is appropriate that provision for homestay be made if the homestay activity is associated with a rural activity only.

**Relief Sought:** Amend second sentence to read: "Plan rules will limit residential density in the zone to one dwelling per property along with rights for homestay facilities where associated with a rural activity only."

**Otuwhero Estate Limited - Participant #: 7 Submission #: 138**

The plan states "plan rules will control subdivision to protect the rural environment". People are part of the rural environment, their housing is part of the rural environment. These provisions will impact in a major adverse way on the rural environment. The plan focuses far too much on "rural environment" and not enough on the interests of people and communities.

**Relief Sought:** Clarify and refine the provisions to reflect the above.

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

What is the purpose of this method? It may not be in the public interest. Arbitrary and damaging particularly for Rural 4.

**Relief Sought:** Delete the new sentence starting: "Plan rules will limit residential density in the zone..."

**V1-12.2.3.ca - Rural Environments, 12.2.3 Methods-Council Activities**

**Department of Conservation - Participant #: 229 Submission #: 5442**

Department supports amendment to "council activities" method. These actions are considered a positive means of promoting the enhancement of landscape and indigenous biodiversity values on public land.

**Relief Sought:** Retain reference to landscape and biodiversity initiatives in the "council activities" method of implementation 12.2.3.

**E D Townley Limited - Participant #: 85 Submission #: 1165**

How can a plan "work in partnership" with the community? The plan is a document which affects the community generally and private land owners in particular. "Working in partnership" must be achieved during the plan development process. The statement is nonsense.

**Relief Sought:** Delete new paragraphs.

**Horticulture New Zealand - Participant #: 27 Submission #: 275**

Throughout the plan there are references to the "working rural landscape" and the need for it to be considered in the context of a range of activities. Yet it is not defined. It needs to be clear what comprises or makes up the "working rural landscape" so there is certainty as to the outcomes anticipated.

It would appear to be more the rural character that is being described - key components that make the rural area unique. Such character includes smells and noises.

The variation in places refers to an "attractive landscape" or what is "aesthetically pleasing". It is considered that these are subjective matters and that it would be best to delete such references and focus on the description of rural areas.

**Relief Sought:** Delete "attractive" from the new paragraph under "council activities".

**Marlborough Roads - Participant #: 88 Submission #: 1262**

Declaration of limited access road on Old Renwick Rd is supported.

**Relief Sought:** Support

**N Z Institute of Surveyors - Participant #: 3 Submission #: 50**

It is not the place for a District Plan to outline the proposals for conferring limited access roads in any particular area. This is a function of Marlborough Roads.

**Relief Sought:** Remove all references to the conferring of limited access status on Old Renwick Road.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 139**

How can a plan "work in partnership" with the community? The plan is a document which affects the community generally and private land owners in particular. "Working in partnership" must be achieved during the plan development process. The statement is nonsense.

*Relief Sought:* Delete new paragraphs.

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

This policy is contradictory. Restoration is not possible and adverse effects impossible to define.

The landscape working groups are being given a licence to make a profit at the expense of subdividers and developers. This is unethical.

*Relief Sought:* Delete new paragraph.

**V1-12.2.3.ex - Rural Environments, 12.2.3 Methods, explanation, 1st paragraph****E D Townley Limited - Participant #: 85 Submission #: 1166**

The provisions confuses "protection of the life supporting capacity of the soil" (section 5) and "retention of the life supporting capacity of the land" - the two are no the same. The provision reconfirms the arbitrary 8ha minimum allotment size. The effect is to encourage non-approval of applications for resource consent despite their merit. Then consequence is a de- facto prohibited activity status which cannot be supported by a proper s32 analysis.

*Relief Sought:* Delete the provision.

**Marris, John & Alison - Participant #: 234 Submission #: 5517**

Support the amended paragraph. Retention of the 8ha minimum size within the Rural 3 Zone will ensure natural resources are managed in a way that enables them to meet the needs of future generations.

*Relief Sought:* Accept the proposed amendments.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 51**

The 8ha minimum area referred to is listed under the controls of the rural subdivision rules in the plan. The outcomes of maintaining that 8ha minimum for varying that size, can change from time to time as it has in the past.

*Relief Sought:* That the final new sentence "The 8 hectare minimum..." be removed completely

**New Zealand Winegrowers - Participant #: 39 Submission #: 411**

NZ Winegrowers supports the plan's maintenance of the 8ha minimum allotment size. This minimum allotment size is essential to preserving the productive capacity of the Wairau Plain and preventing fragmentation of the rural zone and the associated loss of productive land capacity.

*Relief Sought:* Retain the 8ha minimum allotment size.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 140**

The provisions confuses "protection of the life supporting capacity of the soil" (section 5) and "retention of the life supporting capacity of the land" - the two are no the same. The provision reconfirms the arbitrary 8ha minimum allotment size. The effect is to encourage non-approval of applications for resource consent despite their merit. Then consequence is a de- facto prohibited activity status which cannot be supported by a proper s32 analysis.

*Relief Sought:* Delete the provision.



**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6531**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6646**

**Hadley, J A & J P - Participant #: 63 Submission #: 572**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6727**

**Tu Jaes Trust - Participant #: 64 Submission #: 6446**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6703**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6842**

**Wharehunga Trust - Participant #: 70 Submission #: 6932**

Last sentence of the first paragraph of the explanation removes discretion of resource consent decision makers and signals a de-facto prohibited status for subdivision applications of less than

**Relief Sought:** Remove last sentence of first paragraph of explanation.

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

This provision enshrines the 8ha minimum subdivision and does not apply to conservation, cultural or recreational land. This is therefore discriminatory.

**Relief Sought:** Review this provision.

### **V1-12.2.3.ex2 - Rural Environments, 12.2.3 Methods, explanation, 2nd paragraph**

**Sherwood, Nancy - Participant #: 61 Submission #: 514**

".... Needs of crop rotation..." . How does viticulture fit with this? Perhaps inter-row planting of various types would meet this need.

**Relief Sought:** None specified

### **V1-12.2.7 - Rural Environments, new objective 12.2.7**

**Clintondale Trust - Participant #: 23 Submission #: 198**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Amend to read: "Maintain the integrity of the arterial roading network of the Wairau Plain without negatively impacting upon essential primary production activities:."

**Marlborough Roads - Participant #: 88 Submission #: 1261**

Marlborough Roads supports appropriate development on those properties with frontage to local roads.

**Relief Sought:** Support

**NZ Automobile Association Incorporated - Participant #: 240 Submission #:**

Strongly support. Effects on the road infrastructure must be remedied or mitigated by the developer at the developers cost.

**Relief Sought:** Support

**Outer Limits Limited - Participant #: 48 Submission #: 473**

All new business activity nodes that will generate significant traffic need to be located on major highways in accordance with their regional functions.

**Relief Sought:** Add new policy 7.2 as follows and renumber others accordingly: "7.2 - Locate nodes of urban business activity adjacent to the arterial network to utilise its function and capacity in a manner whereby effects on safety and convenience can be properly mitigated."

**Transit New Zealand - Participant #: 24 Submission #: 211**

Transit supports the new objective "Maintain the integrity of the arterial roading network of the Wairau Plan" and the associated new policies.

**Relief Sought:** Support

**Weyerhaeuser New Zealand Limited - Participant #: 84 Submission**

WNZI supports new objective 7. This recognises the importance of considering subdivision and land use activities in terms of their effects on the integrity of the road network as well as other

**Relief Sought:** Support

**V1-12.4.1 - Rural Environments, 12.4.1 Issue, statement**

**E D Townley Limited - Participant #: 85 Submission #: 1167**

This is confusing. It refers to "sustainable management" of land given over to rural uses "below 1000 meters" and refers to "the intensively developed land of the Wairau Plain". It nowhere identifies what the zone relates to, or where the "intensively developed land" is. There is no differentiation between what might be the lower Wairau Plain and the remainder of it.

**Relief Sought:** Refine and clarify the provision and relate to Rural 3 only at worst.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 141**

This is confusing. It refers to "sustainable management" of land given over to rural uses "below 1000 meters" and refers to "the intensively developed land of the Wairau Plain". It nowhere identifies what the zone relates to, or where the "intensively developed land" is. There is no differentiation between what might be the lower Wairau Plain and the remainder of it.

**Relief Sought:** Refine and clarify the provision and relate to Rural 3 only at worst.

**V1-12.4.1.dis - Rural Environments, 12.4.1 Issue, discussion**

**Ben Morven Partnership - Participant #: 59 Submission #: 6980**

I agree with most of the amendment if that allows subdivision in the Rural 4 zone.

**Relief Sought:** Support

**Department of Conservation - Participant #: 229 Submission #: 5443**

Department supports amendment. However, it is suggested that the wording of this bullet point could be improved by changing "natural systems" to "natural habitats and ecosystems". Also suggested clarification of first bullet point.

**Relief Sought:** 1. Amend first bullet point to read: "indigenous vegetation".

2. Amend third bullet point to read: "natural habitats and ecosystems, such as wetlands, and riparian margins."

**E D Townley Limited - Participant #: 85 Submission #: 1168**

The provision refers to the Rural 4 zone, but not to the Rural 3 zone. Council should not develop a plan which fetters its ability to grant resource consent for subdivisions in appropriate situations on

their merits. The effect of the provision is to elevate (by implication) subdivision for the purposes identified to practically a prohibited activity. That is inappropriate and is a nonsense to leave applications as discretionary/non-complying but then impose a flavour through the plan such as will in practical terms preclude a grant of consent.

The paragraph starting "there is also a developing trend..." is confused. On one hand it implies that a zoning approach only would be adopted, but on the other hand does not identify where the zones are, why development must be in "appropriate locations" or why subdivision should not result in a "sustainable outcome".

**Relief Sought:** Delete the provisions.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 52**

The paragraph 3 statement that "subdivision/development occurs in appropriate locations" gives no guidance as to what is appropriate and inappropriate. The use of the term "land fragmentation" is used negatively and implies that the creation of 'lifestyle allotments and small rural holdings' will not be viewed favourably in the Rural 4 zone. The third paragraph contradicts the first and second paragraphs which identifies that intensive land use changes are occurring. Part of the final paragraph includes the description "about a forty minute drive from Blenheim". This term is undefinable and is not appropriate to form part of the

**Relief Sought:** 1. Remove paragraph 3 i.e. "There is also a ..."  
2. Remove the following from the final paragraph "about a forty minute drive from Blenheim" and replace with a description which is definable.

**New Zealand Winegrowers - Participant #: 39 Submission #: 412**

NZ Winegrowers submits that it is appropriate for the plan to provide that subdivision and development occur in appropriate locations and provide for sustainable outcomes. However, the plan should expressly provide that subdivision and development should not occur to the detriment of the productive capacity of the soils of the Wairau Plain.

**Relief Sought:** Amend paragraph 3 of the discussion by adding the following to the end of the sentence: "while taking into account the need to protect the existing productive and life supporting capacity of the soils of the Wairau Plain."

**NZ Automobile Association Incorporated - Participant #: 240 Submission #:**

Support especially inclusion of the effects of proposals on the roading network.

**Relief Sought:** Support

**Otuwhero Estate Limited - Participant #: 7 Submission #: 142**

The provision refers to the Rural 4 zone, but not to the Rural 3 zone. Council should not develop a plan which fetters its ability to grant resource consent for subdivisions in appropriate situations on their merits. The effect of the provision is to elevate (by implication) subdivision for the purposes identified to practically a prohibited activity. That is inappropriate and is a nonsense to leave applications as discretionary/non-complying but then impose a flavour through the plan such as will in practical terms preclude a grant of consent.

The paragraph starting "there is also a developing trend..." is confused. On one hand it implies that a zoning approach only would be adopted, but on the other hand does not identify where the zones are, why development must be in "appropriate locations" or why subdivision should not result in a "sustainable outcome".

**Relief Sought:** Delete the provisions.

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28  
Submission #: 306**

Support the addition of water and land resources to the first bullet point and support the addition of the third bullet point (natural systems, such as wetlands and other habitat).

**Relief Sought:** Add the following bullet points: "-natural character of rivers, lakes, wetlands and their margins; - indigenous biological diversity".

**Sherwood, Nancy - Participant #: 61 Submission #: 515**

Increasing development and traffic means pressure on an inadequate roading system. This will be exacerbated if the Trust Power scheme puts 260 trucks a day on the road.

**Relief Sought:** None specified

**Transpower New Zealand Limited - Participant #: 25 Submission #: 225**

The national grid, like the road network, is regionally and nationally significant infrastructure. The trend of land fragmentation has the potential to adversely affect the integrity of existing electricity transmission lines. Transpower seeks to avoid adverse effects on the National grid.

**Relief Sought:** Add the following new bullet point in section 12.4.1: "high voltage transmission lines"

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6549****Hadley Reese Partnership - Participant #: 66 Submission #: 6649****Hadley, J A & J P - Participant #: 63 Submission #: 573****J A Hadley Family Trust - Participant #: 68 Submission #: 6746****Tu Jaes Trust - Participant #: 64 Submission #: 6442****Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6699****Wharehunga Forestry Limited - Participant #: 69 Submission #: 6838****Wharehunga Trust - Participant #: 70 Submission #: 6934**

Term "land fragmentation" in the second new paragraph of the discussion has been applied in a negative way and applied collectively to all lifestyle allotments and small holdings. These are an accepted form of land use in rural areas.

**Relief Sought:** Delete "of land fragmentation".

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

No specifics are necessary for Rural 4.

**Relief Sought:** None specified

**V1-12.4.2.1 - Rural Environments, objective 12.4.2.1****N Z Institute of Surveyors - Participant #: 3 Submission #: 53**

"The retention of primary production options" effectively places unjustified restrictions on land uses for land owners in the rural area. It also does not follow on logically from the existing part of the

**Relief Sought:** Remove amendment to objective completely.

**New Zealand Winegrowers - Participant #: 39 Submission #: 413**

NZ Winegrowers submits it is appropriate that the plan expressly provides for the protection of primary production options of rural land. In addition it supports the inclusion of new policy 1.5 designed to ensure that subdivision and development do not unduly degrade existing primary production options.

Inappropriate subdivision and development can be dealt with through the resource consent

**Relief Sought:** Retain objective 1

**V1-12.4.2.1.5 - Rural Environments, new policy 12.4.2.1.5****E D Townley Limited - Participant #: 85 Submission #: 1169**

What does the new policy mean? What are the options referred to and how can they be "options" if they are "existing"? What is meant by the words "unduly degrade"?

**Relief Sought:** Delete the provision

**N Z Institute of Surveyors - Participant #: 3 Submission #: 54**

This new policy effectively places unjustified restrictions on land uses for land owners in the rural

**Relief Sought:** Remove new policy completely.

**New Zealand Winegrowers - Participant #: 39 Submission #: 414**

NZ Winegrowers submits it is appropriate that the plan expressly provides for the protection of primary production options of rural land. In addition it supports the inclusion of new policy 1.5 designed to ensure that subdivision and development do not unduly degrade existing primary production options.

Inappropriate subdivision and development can be dealt with through the resource consent

**Relief Sought:** Retain policy 1.5

**Otuwhero Estate Limited - Participant #: 7 Submission #: 143**

What does the new policy mean? What are the options referred to and how can they be "options" if they are "existing"? What is meant by the words "unduly degrade"?

**Relief Sought:** Delete the provision

**Outer Limits Limited - Participant #: 48 Submission #: 474**

Urban expansion in a sustainable form is as important to the overall sustainability of the region as is the maintenance of the primary productive potential of the soils around the towns.

**Relief Sought:** Add the following at the end of policy 1.5: "...except where urban expansion is appropriate in terms of sustainable management of urban resources (e.g. infrastructure, services, road networks and energy conservation consideration)."

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28 Submission #: 307**

**Relief Sought:** Delete the word "unduly".

**Weyerhaeuser New Zealand Limited - Participant #: 84 Submission Support**

**Relief Sought:** Support

**V1-12.4.2.1.ex - Rural Environments, 12.4.2.1 explanation**

**E D Townley Limited - Participant #: 85 Submission #: 1170**

The phrase "are able to compromise primary production options" should be deleted and the word "may" inserted instead. The provision seems to conflict with other provisions of the plan and recognising the appropriateness of resource consent applications.

**Relief Sought:** 1. Amend the new paragraph to recognise that subdivision in some cases may compromise "an economic rural holding" but do not try and combine "primary production options" with existing "economic rural holdings".

2. Insert "may" delete "are able"

**N Z Institute of Surveyors - Participant #: 3 Submission #: 55**

"Inappropriate subdivision" is used in such a manner as to place a negative connotation on that process, when subdivision is a vital tool for unlocking the value in property.

The term "economic rural holding" is not justified as there is no clear definition in the plan. It is dependent on land use practices not allotment sizes.

The final sentence of paragraph is promoting ad-hoc decision making and provides no clear guidance as to what is appropriate and what is inappropriate.

**Relief Sought:** Remove new paragraph completely.

**New Zealand Winegrowers - Participant #: 39 Submission #: 415**

NZ Winegrowers submits it is appropriate that the plan expressly provides for the protection of primary production options of rural land. In addition it supports the inclusion of new policy 1.5 designed to ensure that subdivision and development do not unduly degrade existing primary production options.

Inappropriate subdivision and development can be dealt with through the resource consent

**Relief Sought:** Amend new paragraph at the end of the explanation by adding: "...and subdivision and development that will compromise primary production options will not be permitted."

**Otuwhero Estate Limited - Participant #: 7 Submission #: 144**

The phrase "are able to compromise primary production options" should be deleted and the word "may" inserted instead. The provision seems to conflict with other provisions of the plan and recognising the appropriateness of resource consent applications.

**Relief Sought:** 1. Amend the new paragraph to recognise that subdivision in some cases may compromise "an economic rural holding" but do not try and combine "primary production options" with existing "economic rural holdings".

2. Insert "may" delete "are able"

**PYG Limited - Participant #: 238 Submission #: 5561**

There is no definition in the plan as to what economic rural holdings are.

**Relief Sought:** Delete this section.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6542****Hadley Reese Partnership - Participant #: 66 Submission #: 6622****Hadley, J A & J P - Participant #: 63 Submission #: 574****J A Hadley Family Trust - Participant #: 68 Submission #: 6751****Tu Jaes Trust - Participant #: 64 Submission #: 6470****Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6696****Wharehunga Forestry Limited - Participant #: 69 Submission #: 6832****Wharehunga Trust - Participant #: 70 Submission #: 6895**

"Economic rural holdings" is not definable by allotment size but rather by land use practices. Economic rural holdings may also not result in sustainable management of the land resource.

**Relief Sought:** Delete the explanation.

**V1-12.4.2.2 - Rural Environments, objective 12.4.2.2****Department of Conservation - Participant #: 229 Submission #: 5444**

Amendment is supported. However, the objective could be reworded to provide more effective guidance for plan users in respect of productive land values.

**Relief Sought:** Amend objective 2 to read: "To enable a range of activities to occur which maintain the quality of the environment, including rural amenities and natural values."

**E D Townley Limited - Participant #: 85 Submission #: 1171**

Objective 12.4.2 and the associated policies focus largely only on "rural amenities" and "natural values" without recognising the importance of people in the rural environment.

**Relief Sought:** Delete the provisions.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 145**

Objective 12.4.2 and the associated policies focus largely only on "rural amenities" and "natural values" without recognising the importance of people in the rural environment.



**Relief Sought:** Delete the provisions.

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28  
Submission #: 308**

Support, but add new policies.

**Relief Sought:** Support but add the following new polices:  
"2.7 Protect the healthy functioning of aquatic ecosystems, including the quantity and quality of aquatic habitats.  
2.8 Protect significant habitat of indigenous flora and fauna from any further degradation or

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28  
Submission #: 309**

Support two new paragraphs.

**Relief Sought:** Retain

### **V1-12.4.2.2.3 - Rural Environments, new policy 12.4.2.2.3**

**Department of Conservation - Participant #: 229 Submission #: 5445**

Policy is supported.

**Relief Sought:** Retain policy 2.3.

**E D Townley Limited - Participant #: 85 Submission #: 5652**

Policy 2.3 makes no mention of the importance of people in the "working landscape". The "quality working landscape" and "working landscape" is not defined. This leaves interpretation open ended and uncertain.

**Relief Sought:** Delete the provisions.

**Horticulture New Zealand - Participant #: 27 Submission #: 272**

Throughout the plan there are references to the "working rural landscape" and the need for it to be considered in the context of a range of activities. Yet it is not defined. It needs to be clear what comprises or makes up the "working rural landscape" so there is certainty as to the outcomes anticipated.

It would appear to be more the rural character that is being described - key components that make the rural area unique. Such character includes smells and noises.

The variation in places refers to an "attractive landscape" or what is "aesthetically pleasing". It is considered that these are subjective matters and that it would be best to delete such references and focus on the description of rural areas.

**Relief Sought:** Delete references to "aesthetically pleasing" in regard to rural areas such as 12.4.2 new policy

**N Z Institute of Surveyors - Participant #: 3 Submission #: 56**

The new policy includes references to items which are somewhat unclear i.e. "quality working rural landscape", "healthy natural system" and "aesthetically pleasing".

**Relief Sought:** Policy should be removed

**New Zealand Winegrowers - Participant #: 39 Submission #: 416**

NZ Winegrowers submits the reference to "aesthetically pleasing" in policy 2.3 is subjective and not effects based. Only productive rural activities and activities ancillary to productive rural activities should be permitted in the rural zone and it is therefore inappropriate to encourage activities that are "aesthetically pleasing". Any attempt to enhance the quality of the rural landscape must not be sought to the detriment of the productive use of the rural zone.

**Relief Sought:** Amend policy 2.3 to read: "Promote and encourage the retention and enhancement of a quality working natural landscape that is based upon healthy natural systems while preserving the productive and life supporting attributes of the area and while acknowledging rural activities by their very nature contribute and are an essential part of the character and amenity of the rural zone."

**Otuwhero Estate Limited - Participant #: 7 Submission #: 5657**

Policy 2.3 makes no mention of the importance of people in the "working landscape". The "quality working landscape" and "working landscape" is not defined. This leaves interpretation open ended and uncertain.

**Relief Sought:** Delete the provisions.

**Sherwood, Nancy - Participant #: 61 Submission #: 516**

Policy most welcome as all are currently flaunted in Wairau Valley township.

**Relief Sought:** Support

**Weyerhaeuser New Zealand Limited - Participant #: 84 Submission**

**Relief Sought:** Replace "compliments" with "complements".

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6544****Hadley Reese Partnership - Participant #: 66 Submission #: 6618****Hadley, J A & J P - Participant #: 63 Submission #: 575****J A Hadley Family Trust - Participant #: 68 Submission #: 6757****Tu Jaes Trust - Participant #: 64 Submission #: 6479****Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6700****Wharehunga Forestry Limited - Participant #: 69 Submission #: 6855****Wharehunga Trust - Participant #: 70 Submission #: 6899**

Phrases "quality working rural landscape" and "aesthetically pleasing" are not definable in RMA

**Relief Sought:** Either reword to give meaning or delete.

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

This policy is not clear as to the most important issue i.e. landscape or activities.

**Relief Sought:** None specified

**V1-12.4.2.2.4 - Rural Environments, new policy 12.4.2.2.4****Department of Conservation - Participant #: 229 Submission #: 5446**

Policy is supported.

**Relief Sought:** Retain.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 57**

New policy is acceptable

**Relief Sought:** Policy is satisfactory.

**Sherwood, Nancy - Participant #: 61 Submission #: 517**

Policy most welcome as all are currently flaunted in Wairau Valley township.

**Relief Sought:** Support

**V1-12.4.2.2.5 - Rural Environments, new policy 12.4.2.2.5****Department of Conservation - Participant #: 229 Submission #: 5447**

Policy is supported but could be improved by adding reference to riparian margins and replacing reference to "natural values" with a more consistent description..

**Relief Sought:** Amend policy 2.5 as follows: "Encourage and support the retention and enhancement of wetlands, indigenous riparian vegetation, and other natural habitats and ecosystems."

**N Z Institute of Surveyors - Participant #: 3 Submission #: 58**

New policy is acceptable.

**Relief Sought:** Policy is satisfactory.

**Sherwood, Nancy - Participant #: 61 Submission #: 518**

Policy most welcome as all are currently flaunted in Wairau Valley township.

**Relief Sought:** Support

**V1-12.4.2.2.6 - Rural Environments, new policy 12.4.2.2.6****Department of Conservation - Participant #: 229 Submission #: 5448**

Policy is supported but could be improved by adding reference to riparian margins and replacing reference to "natural values" with a more consistent description..

**Relief Sought:** Amend policy 2.6 as follows: "Protect wetlands, riparian margins, and other natural habitats and ecosystems from being degraded by subdivision / development and from inappropriate land management practices."

**N Z Institute of Surveyors - Participant #: 3 Submission #: 59**

The policy again illustrates the huge restrictions that are being put on subdivision in the rural area. Subdivision and development activities don't need to be highlighted.

**Relief Sought:** Policy 2.6 should be amended to read: "Protect wetlands and natural systems from being degraded by inappropriate land management practices".

**Sherwood, Nancy - Participant #: 61 Submission #: 519**

Policy most welcome as all are currently flaunted in Wairau Valley township.

**Relief Sought:** Support

**V1-12.4.2.2.ex - Rural Environments, objective 12.4.2.2, explanation****Department of Conservation - Participant #: 229 Submission #: 5449**

Explanatory text is supported but "natural systems" should be replaced by more consistent term.

**Relief Sought:** Amend new explanatory text to read: "...Whilst it is acknowledged that primary production is at the heart of rural land management, the retention and enhancement of natural habitats and ecosystems, such as wetlands, must be given priority."

**N Z Institute of Surveyors - Participant #: 3 Submission #: 60**

"Land fragmentation" in paragraph 2 singles out subdivision in a negative manner. The term "limited and fragile water sources" is also not appropriate as there is no relevant evidence to support this.

**Relief Sought:** Amend new paragraphs to read: "Fresh water resources continue to come under increasing pressure. This needs to be acknowledged in the context of broader decision making.

Pressure for more intensive development means additional pressures to maximize land are for production purposes. Whilst it is acknowledged that production is at the heart of rural land management, the retention and enhancement of natural systems must be given priority."

**Sherwood, Nancy - Participant #: 61 Submission #: 520**

This statement is true and should replace 12.2.1.4 which tends to open the door to further damaging exploration.

**Relief Sought:** Replace 12.2.1.4 with the explanation for new 12.4.2 Objective 2.

**V1-12.4.2.3 - Rural Environments, new objective 12.4.2.3****N Z Institute of Surveyors - Participant #: 3 Submission #: 61**

The new objective does not belong in Chapter 12 as it is already established in Chapter 19.

**Relief Sought:** Remove new Objective 3 completely.

**NZ Automobile Association Incorporated - Participant #: 240 Submission #:**  
Support

**Relief Sought:** Support

**Transit New Zealand - Participant #: 24 Submission #: 212**  
Transit supports new objective.

**Relief Sought:** Support

**Transpower New Zealand Limited - Participant #: 25 Submission #: 226**

The national grid, like the road network, is regionally and nationally significant infrastructure. The trend of land fragmentation has the potential to adversely affect the integrity of existing electricity transmission lines. Transpower seeks to avoid adverse effects on the National grid.

**Relief Sought:** Amend the proposed new objective to read: "Maintain the integrity of the district's infrastructure (including road network and the national grid)".

**Transpower New Zealand Limited - Participant #: 25 Submission #: 227**

The national grid, like the road network, is regionally and nationally significant infrastructure. The trend of land fragmentation has the potential to adversely affect the integrity of existing electricity transmission lines. Transpower seeks to avoid adverse effects on the National grid.

**Relief Sought:** Insert two new policies as follows:

"Policy 3.3 When considering applications for subdivision, the erection of buildings, structures, and other activities (e.g. earthworks, operation of plant) near overhead electric lines, support structures or conductors, ensure that safe separation distances (e.g. including in accordance with the New Zealand Code of Practice for Electrical Safe Distances - NZECP 34:2001) are maintained.

Policy 3.4 Notifying the owners or managers of infrastructure as affected parties of all consent applications that may adversely affect the infrastructure that they own or manage."

### **V1-12.4.2.3.1 - Rural Environments, new policy 12.4.2.3.1**

**NZ Automobile Association Incorporated - Participant #: 240 Submission #:**  
Support

**Relief Sought:** Support

**Transit New Zealand - Participant #: 24 Submission #: 5669**  
Transit supports the policy

**Relief Sought:** Support

### **V1-12.4.2.3.2 - Rural Environments, new policy 12.4.2.3.2**

**NZ Automobile Association Incorporated - Participant #: 240 Submission #:**  
Support

**Relief Sought:** Support

**Transit New Zealand - Participant #: 24 Submission #: 5670**  
Transit supports the new policy

**Relief Sought:** Support

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**  
The aim should be to improve roading rather than restricting subdivision and development.

**Relief Sought:** None specified

## V1-12.5-Gen - Rural Environments, 12.5 General Comments

### **Redwood Pass Vineyards - Participant #: 41 Submission #: 442**

Oppose the amendment to the issue statement and therefore any reference under 12.5 that supports Rural Residential zones. My opposition affects all of 12.5 for these reasons:

- Original wording gives scope to change with the times.
- Who will decide placement of "Rural Residential zones"?
- Little definition of what a Rural Residential zone is intended to be.
- It is about creating hamlet like cells then problems purported to be overcome may be problems that are encountered.
- Council needs to come up with hard evidence to back up this train of thought.
- Proposal is short in detail.
- It proliferates lazy local government creating a one size fits all.
- If this was accepted, then flexibility for residential expansion within the rural environs (e.g. Seddon end of Redwood Pass) would disappear.

**Relief Sought:** 1. Revert to the original wording for this clause that has been changed to refer to residential zones, or, 2. Define "Rural Residential zones" as being the buffer area between town and rural zones, and not as cart blanche applicable to all rural zones.

### **Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6539**

### **Hadley Reese Partnership - Participant #: 66 Submission #: 6634**

### **Hadley, J A & J P - Participant #: 63 Submission #: 576**

### **J A Hadley Family Trust - Participant #: 68 Submission #: 6740**

### **Tu Jaes Trust - Participant #: 64 Submission #: 6475**

### **Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6698**

### **Wharehunga Forestry Limited - Participant #: 69 Submission #: 6862**

### **Wharehunga Trust - Participant #: 70 Submission #: 6914**

These amendments change land use options significantly by preventing Rural Residential living except if initiated by a plan change to establish a new zone. This is overly restrictive and plan changes are extremely slow and expensive.

This assumes that more than one dwelling is undesirable. This doesn't take into account the need to provide accommodation for family members or other workers.

Using policies and objectives to prevent discretionary or non-complying subdivision, except by plan change, is establishing a de facto prohibited status for subdivision.

**Relief Sought:** Either reword the entire section to address concerns, or delete changes.

## V1-12.5 - Rural Environments, 12.5 heading

### **N Z Institute of Surveyors - Participant #: 3 Submission #: 62**

Amending the heading is not suitable given that the term "Rural Residential" already relates to an existing zone within the Plan. The issue addressed by the heading is in regard to the activity of residential activity in the rural environment not specifically the Rural Residential Zone. This again illustrates the intentions of this variation to limit Rural Residential style developments to the plan change process when Council is obligated under the RMA to accept non-complying applications.

**Relief Sought:** Delete "Rural Residential" from the heading and reinstate the heading as "Residential Activity in the Rural Environment"

## V1-12.5.1 - Rural Environments, 12.5.1 Issue, statement

### **Clintondale Trust - Participant #: 23 Submission #: 200**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic

environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Amend the issue statement as follows: "Accommodating Rural Residential living in a specific zone which does not negatively impact upon primary production activities in the rural

**E D Townley Limited - Participant #: 85 Submission #: 1172**

This provision taken literally would preclude residential living activity in the rural zone. The effect of the provision is to require Rural Residential living only in "a specific zone" which goes back to the direction and control mentality of the Town and Country Planning Act. This approach is not appropriate under the RMA.

**Relief Sought:** Delete the provision.

**Goodwin, T J & D I - Participant #: 221 Submission #: 5410**

Inadequate investigation into appropriate zoning within the region means that non-complying applications are the only economic avenue available to land owners.

**Relief Sought:** Delete the proposed amendments and retain existing wording.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 63**

This statement refers to a specific zone which is contradictory to the prior paragraph (37). In general the statement precludes any Rural Residential living in the general rural environment which is not in a specific Rural Residential zone.

**Relief Sought:** Remove the amendment completely.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 146**

This provision taken literally would preclude residential living activity in the rural zone. The effect of the provision is to require Rural Residential living only in "a specific zone" which goes back to the direction and control mentality of the Town and Country Planning Act. This approach is not appropriate under the RMA.

**Relief Sought:** Delete the provision.

**V1-12.5.1.dis - Rural Environments, 12.5.1 Issue, discussion**

**Adams S J - Participant #: 4 Submission #: 101**

Severe limitation of houses per property cuts across traditional farming practices of providing houses for staff and family on-site. There is a need for separate titles for houses for tax efficiency purposes and asset protection. I agree with keeping developers and housing tracts out of the country, but deplore the broad brushstroke that cuts across sensible running of rural properties.

**Relief Sought:** 1. Delete "a ceiling of one" from new paragraph.  
2. Provide a user friendly method of allowing property owners to manage their own affairs whilst keeping out property developers of housing out of the country. e.g. providing for curtilage subdivision but not allowing people to use it as a way to sell off and redevelop.  
3. Add a mechanism to link properties of different ownership through a declaration form that allows different privileges from those proposed in the variation esp. multiple housing units.



**Clintondale Trust - Participant #: 23 Submission #: 201**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Amend the existing paragraph 4 of the discussion to read: "Although there is a duty under section 17 of the Act to avoid, remedy or mitigate any adverse effects, the Council recognises that the principal rural activities inherently involve effects that may not practicably meet the expectations of an urban environment. Urban activities at the rural urban interface must expect a reduction in urban amenity levels where there are justifiable and reasonable effects as a result of preserving and sustaining primary production potential and activities in the adjoining

**E D Townley Limited - Participant #: 85 Submission #: 1173**

The effect of the words "a greater density of residential activity is undesirable" is to impose a constraint upon the Council which may well fetter its ability to deal with a resource consent application because of the strength of the provision.

**Relief Sought:** Delete provision.

**Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 241**

Federated Farmers disagree with the use of "community expectation" in this paragraph. It is the expectation of FFNZ (who are also members of the rural community) that dwellings should be provided where necessary for relatives and/or workers.

This is inequitable, as a 1ha farm for example, requires far fewer employees to run than a 1000ha farm, yet they are treated the same under this variation.

**Relief Sought:** Amend new paragraph under 12.5.1 to read as follows or words to this effect: "The density of sustainable residential settlement per title, along with associated homestay activities, will be assessed on a case-by-case basis, to ensure appropriate residential settlement can occur, and undesirable residential activity is managed".

**Horticulture New Zealand - Participant #: 27 Submission #: 264**

Horticulture NZ does not support the approach to residential dwellings in the rural zones and the requirement for either a discretionary or non-complying consent of more than one dwelling on a title. Such provisions do not provide an adequate framework for provision of dwellings for rural workers. Owners within only one title are disadvantaged.

It has generally been recognised that there may be more than one dwelling on rural properties to service the needs to the property and this should be allowed to continue.

The requirements for dwelling house for dependent relatives are draconian and unworkable.

The approach seems based on "lifestyle" development being "residential" but this overlooks the fact there is a need for residences for rural workers. If the focus is on lifestyle type residences that should be stated. Residences that service the rural sector are not usually considered incompatible with the rural environment. There is no distinction between lifestyle type activity and that necessary for the rural productive sector.

**Relief Sought:** Delete new paragraph 3 "the density of residential settlement...".

**Leavesden Farm Limited - Participant #: 5 Submission #: 103**

Severe limitation of houses per property cuts across traditional farming practices of providing houses for staff and family on-site. There is a need for separate titles for houses for tax efficiency purposes and asset protection. I agree with keeping developers and housing tracts out of the country, but deplore the broad brushstroke that cuts across sensible running of rural properties.

**Relief Sought:** 1. Amend the first sentence as follows.

"The density of residential settlement is based upon a community expectation and sustainable management of residential dwelling per title, along with associated homestay activities. A greater density of non associated residential activity is desirable"

2. Insert the following new sentence at the end of the last paragraph.

"Provide for curtilage subdivision of properties but tied to the original property to facilitate efficient taxation positions for the owners of farms.

3. Add a mechanism to link properties of different ownership through a declaration form that allows different privileges from those proposed in the variation esp. multiple housing units.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 64**

The use of "community expectation" is completely inaccurate. The sentence "A greater density..." does not take into account the requirements of land holdings where is it desirable to have an additional dwelling suitable for a manager's residence etc.

The Plan should make it clear that the occurrence of additional dwellings on a single title in the rural area does not mean that subdivision can proceed in the future.

Reference to "Rural Residential zones" and "application for a plan change" is not acceptable. The plan change process is generally proven to be unwieldy, longwinded and expensive.

**Relief Sought:** Remove the new paragraph and amendments completely.

**New Zealand Winegrowers - Participant #: 39 Submission #: 417**

NZ Winegrowers submits that homestay activities within the rural zone should be ancillary to rural activities. Homestay activities that are not ancillary create potential reverse sensitivity issues.

Urban activities at the rural/urban interface must expect a reduction in urban amenity levels and primary production activities must be given precedence within the rural environment.

The reference to one dwelling per title is inappropriate for the reasons outlined in chapter 12, objective 2, policy 2.5.

**Relief Sought:** Amend the new paragraph to read: "The density of residential settlement is based upon a community expectation but this community expectation must be sustainably managed in light of the realities of the rural zone and primary production activities must be given precedence within the rural environment."

**Otuwhero Estate Limited - Participant #: 7 Submission #: 147**

The effect of the words "a greater density of residential activity is undesirable" is to impose a constraint upon the Council which may well fetter its ability to deal with a resource consent application because of the strength of the provision.

**Relief Sought:** Delete provision.

**PYG Limited - Participant #: 238 Submission #: 5562**

To consider development only through a plan change is inappropriate as there is provision under the RMA for resource consents. This option should remain open.

**Relief Sought:** Delete the words: "in an application for a plan change."

**Sherwood, Nancy - Participant #: 61 Submission #: 521**

"... rural/urban interface...". Could be mitigated by a green belt.

**Relief Sought:** None specified

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

This provision is arbitrary, takes no account of the title size, area or social necessity and should therefore be removed.

**Relief Sought:** Delete new provisions.

### **V1-12.5.2.1 - Rural Environments, objective 12.5.2.1**

**Goodwin, T J & D I - Participant #: 221 Submission #: 5411**

Support - Encourage active council participation in rezoning issues. Perhaps range of existing zones is insufficient.

**Relief Sought:** Support

**Jenkins, R J & R - Participant #: 49 Submission #: 6977**

Support objective and associated policy statements recognizing a planned development of Rural Residential properties wherever appropriate.

**Relief Sought:** Support

**Marris, John & Alison - Participant #: 234 Submission #: 5524**

**Relief Sought:** 1. Amend objective 1 to read: "Provide for and enable the provision of Rural Residential zone locations with areas less suitable for agricultural production which allow allotments of both residential and Rural Residential properties to be created."

2. Make other consequential amendments to give effect to the changes sought.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 67**

This new objective restricts Rural Residential subdivision to be only available via the plan change process to create a new zone. Use of plan changes to be able to effect Rural Residential subdivision is inappropriate and illogical.

**Relief Sought:** Remove the deletion and replacement completely.

### **V1-12.5.2.1.1 - Rural Environments, policy 12.5.2.1.1**

**N Z Institute of Surveyors - Participant #: 3 Submission #: 65**

The use of plan changes to create new zoning is generally inappropriate in most cases.

**Relief Sought:** Amend policy to read: "Ensure that the establishment of Rural Residential development does not exacerbate conflicts between rural uses and residential activity".

**Transpower New Zealand Limited - Participant #: 25 Submission #: 228**

High voltage transmission lines can be adversely affected by improperly designed residential developments and related activities occurring in close proximity to the lines. Given the wording of this issue, Transpower considers it is appropriate to amend policy 1 to include nationally significant infrastructure.

**Relief Sought:** Amend policy to read as follows: "Ensure that the establishment of Rural Residential zones does not exacerbate conflicts between rural uses, nationally significant infrastructure, and residential activity".

### **V1-12.5.2.1.2 - Rural Environments, policy 12.5.2.1.1**

**Ben Morven Partnership - Participant #: 59 Submission #: 496**

I don't agree with deletion of policy 1.2. There should be flexibility to subdivide in Rural 4 zone. It is much better to allow subdivision in the poor quality soils of Rural 4 than the good fertile soils of Rural 3.

**Relief Sought:** Oppose deletion of the policy

**N Z Institute of Surveyors - Participant #: 3 Submission #: 66**

The existing policy must remain otherwise the ability of Council to grant a simple lifestyle rural subdivision or small holding for intensive farming purposes is effectively removed.

*Relief Sought:* Remove deletion completely

**V1-12.5.3 - Rural Environments, 12.5.3 Methods****E D Townley Limited - Participant #: 85 Submission #: 1174**

The thrust of the methods is to limit to one dwelling house per title, thereby excluding the abilities of families to look after relatives by providing a second dwelling, in particular dependent relatives.

*Relief Sought:* Delete the provision.

**Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 242**

The federation feels that limiting dwellings per title by a "one rule fits all" approach is too restrictive and inappropriate. Larger properties may require more workers and therefore more accommodation. Another dwelling may be more than acceptable in some instances, and have little visual effect, or impact on those landscape values council is trying to maintain. The method is

*Relief Sought:* Delete the method

**Goodwin, T J & D I - Participant #: 221 Submission #: 5412**

Emphasis needs to be on council participation and leadership.

*Relief Sought:* Amend the "plan changes" method to read: "New localities for Rural Residential zoning will be accommodated through plan change procedures actively encouraged by council."

**N Z Institute of Surveyors - Participant #: 3 Submission #: 68**

This amendment is generally satisfactory. However, we struggle to understand why David St has not been rezoned as yet.

*Relief Sought:* Leave as amended.

**New Zealand Winegrowers - Participant #: 39 Submission #: 418**

It is inappropriate for the rules to limit residential density in all rural zones to one dwelling per title for reasons outlined in objective 2, policy 2.5. In addition, associated homestay facilities should be limited to those homestay facilities ancillary to rural activities.

*Relief Sought:* Delete new paragraph under the "rules" subheading.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 148**

The thrust of the methods is to limit to one dwelling house per title, thereby excluding the abilities of families to look after relatives by providing a second dwelling, in particular dependent relatives.

*Relief Sought:* Delete the provision.

**Transpower New Zealand Limited - Participant #: 25 Submission #: 229**

High voltage transmission lines can be adversely affected by improperly designed residential developments and related activities occurring in close proximity to the lines. Given the wording of this issue, Transpower considers it is appropriate to amend section 12.5.3 to establish a link to the existing rules relating to subdivision near transmission lines.

*Relief Sought:* Add the following paragraph to the Rules method: "Rules restricting subdivision and other activities around high voltage transmission lines are already in place in section 2.4.4 (General Standards - Controlled Subdivision Activities), 3.4.3 (Limits to Council's Discretion), and 3.5.5.11 (Assessment Criteria - Discretionary and Non-complying Subdivision Activities) of Volume 2 of the plan."

**A Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

This provision is arbitrary, takes no account of the title size, area or social necessity and should therefore be removed.

*Relief Sought:* Delete new provisions.

### **V1-12.5.3.ex - Rural Environments, 12.5.3 Methods, explanation**

#### **E D Townley Limited - Participant #: 85 Submission #: 1175**

The provisions seem to have the effect of precluding resource consent applications and limiting activity changes / density changes to the plan change process. The Plan is not operative, and the "tying of the hands" which the provision indicates will impact in a major way upon the community and its economy.

*Relief Sought:* Delete the provisions.

#### **Goodwin, T J & D I - Participant #: 221 Submission #: 5413**

Plan change process is not suitable for the majority of smaller land owners.

*Relief Sought:* Delete the text added to the explanation.

#### **N Z Institute of Surveyors - Participant #: 3 Submission #: 69**

This means that any subdivision in a general rural area which is not a controlled activity would be required to go through the plan change process. This is unacceptable and could have serious economic effect on the development of the province.

*Relief Sought:* Delete the amendment completely.

#### **New Zealand Winegrowers - Participant #: 39 Submission # 419**

It is appropriate that changes to activities or density within the rural zone be planned for in a comprehensive manner and be promoted through the plan change process. Such an approach accords with the purpose of the RMA.

*Relief Sought:* Retain the amended explanatory paragraph.

#### **Otuwhero Estate Limited - Participant #: 7 Submission #: 149**

The provisions seem to have the effect of precluding resource consent applications and limiting activity changes / density changes to the plan change process. The Plan is not operative, and the "tying of the hands" which the provision indicates will impact in a major way upon the community and its economy.

*Relief Sought:* Delete the provisions.

#### **PYG Limited - Participant #: 238 Submission #: 5563**

Reference is also made to promote development through plan changes.

*Relief Sought:* Delete this section.

#### **Transit New Zealand - Participant #: 24 Submission #: 213**

Transit supports the explanation after 12.5.3 relating to the Rural Residential environment emphasising a planned and comprehensive approach to the establishment of new Rural Residential developments through plan change processes rather than through piecemeal

*Relief Sought:* Support

### **V1-12.9 - Rural Environments, 12.9 AER, new bullet points**

#### **Horticulture New Zealand - Participant #: 27 Submission #: 276**

Throughout the plan there are references to the "working rural landscape" and the need for it to be considered in the context of a range of activities. Yet it is not defined. It needs to be clear what comprises or makes up the "working rural landscape" so there is certainty as to the outcomes anticipated.

It would appear to be more the rural character that is being described - key components that make the rural area unique. Such character includes smells and noises.

The variation in places refers to an "attractive landscape" or what is "aesthetically pleasing". It is

considered that these are subjective matters and that it would be best to delete such references and focus on the description of rural areas.

**Relief Sought:** Delete the word "attractive" from bullet point 3

**N Z Institute of Surveyors - Participant #: 3 Submission #: 70**

Second bullet point does not need to include "production". Second to last bullet point would be difficult to quantify and administer.

**Relief Sought:** 1. Amend the heading of the second bullet point to read: "Environmentally sound land use practices based on:"

2. Delete the second to last bullet point completely.

**New Zealand Winegrowers - Participant #: 39 Submission #: 420**

Having the plan provide for "an attractive working rural landscape for the Wairau Plain" is ambiguous and subjective and neither promotes sustainable management nor the principles being promoted by the Plan.

**Relief Sought:** Delete the new amendment "and attractive working rural landscape on the Wairau Plain."

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28**

**Submission #: 310**

Support

**Relief Sought:** Retain

**Sherwood, Nancy - Participant #: 61 Submission #: 522**

**Relief Sought:** In second bullet point, second sub-bullet point, insert "organic" in front of fertilizers and "limit" in front of agricultural inputs.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6518**

**Hadley, J A & J P - Participant #: 63 Submission #: 577**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6747**

**Tu Jaes Trust - Participant #: 64 Submission #: 6471**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6716**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6859**

**Wharehunga Trust - Participant #: 70 Submission #: 6907**

"Attractive" working rural landscape is not definable. Is this the same as "quality"?

**Relief Sought:** Delete "attractive".

## **V1-12.9.bp - Rural Environments, 12.9 AER**

**Department of Conservation - Participant #: 229 Submission #: 5450**

Amendments to bullet 4 are supported.

**Relief Sought:** Retain 4th bullet point beginning "retention of the aquatic..."

**Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 243**

Federated Farmers believes that the sustainable management of surface and groundwater resources should include recognition of historical water allocations. The Federation feels new bullet point 3 should not be dealt with here. The integrity of the road network would be better dealt with in a part of the Variation that deals more specifically with transport.

**Relief Sought:** 1. Amend bullet point 1 to read: "The sustainable management of surface and groundwater resources including recognising fair and historical allocations."

2. move new bullet 3 from 12.9 Anticipated Environmental Result to a more appropriate place



in Chapter 19 -land transport.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 71**

Bullet points 3, 4 & 5 are out of context and should be removed. The fourth bullet point is very restrictive and could potentially affect the economic development of the province. What does 'stable continuing spatial relationship' mean and how is it defined?

**Relief Sought:** Remove the 3, 4 and 5 bullet points completely.

**New Zealand Winegrowers - Participant #: 39 Submission #: 421**

"Retention of enduring rural activity production options on the Wairau Plain" is of great importance to both the wine industry and other productive uses but it is not necessarily the case that such activity can be supported by subdivision and residential settlement patterns and the focus must be on the life supporting capacity of the soils.

**Relief Sought:** In the fourth new bullet point, delete the words: "supported by appropriate subdivision and residential settlement patterns."

**Transit New Zealand - Participant #: 24 Submission #: 214**

Transit supports the new AERs, but requests the addition of "Rural 4 zones" in the third bullet point.

**Relief Sought:** Adopt the new AERs with the following change - add "and Rural 4 zone" at the end of the third bullet point.

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

**Relief Sought:** Add the following to the end of the first bullet point: "...to include fair and historical allocations."

## V1-19-Gen - Land Transport-General Comments

**Adams Land Nursery & P D & M Lloyd - Participant #: 46 Submission #: 453**

Battys Road is past its use by date as a secondary arterial road. At times almost impossible to exit to the north off Battys Rd. Better to divert traffic along the increasingly used New Renwick Rd and onto Bells Rd.

**Relief Sought:** Divert traffic along the increasingly used New Renwick Rd and onto Bells Rd.

**Ben Morven Partnership - Participant #: 59 Submission #: 6983**

If Rural Residential subdivision was allowed in areas where subdivision already exists, council's roading requirements would be more easy to administer.

**Relief Sought:** Allow Rural Residential subdivisions in areas where subdivision already exists.

**Dodson, R C & J W - Participant #: 31 Submission #: 335**

The volume of traffic from a vineyard compared to pastoral farming leaves no doubt about the increase. We appreciate council's concerns. Surely the solution is to ensure the effects are dealt with. The volume of traffic is only going to increase, council must plan to achieve this to ensure our roads can handle the task.

**Relief Sought:** None specified

**NZ Automobile Association Incorporated - Participant #: 240 Submission #:**

Support the amendments and endorse the effort and insight of council. We also suggest that the long-term roles of New Renwick Road and Bells Road be reconsidered.

**Relief Sought:** Support and reconsider the long term roles of New Renwick Rd and Bells Rd.

## V1-19.2 - Land Transport, 19.2 Issue Statement

**Department of Conservation - Participant #: 229 Submission #: 5451**

Amendment to issue statement is supported. It clarifies the resources that may be adversely

**Relief Sought:** Retain issue statement in 19.2.

### **V1-19.2.dis1 - Land Transport, 19.2 discussion 3rd paragraph**

**Sherwood, Nancy - Participant #: 61 Submission #: 523**

**Relief Sought:** Include bridle paths and tramping tracks, as distinct from "pedestrian pathways".

### **V1-19.2.dis2 - Land Transport, 19.2 discussion last paragraph**

**N Z Institute of Surveyors - Participant #: 3 Submission #: 72**

Proposed wording is confusing. Local authorities rarely lead large scale land use change but rather have to adapt when change happens.

**Relief Sought:** Remove amendment completely.

**Sherwood, Nancy - Participant #: 61 Submission #: 524**

"... Safe, energy efficient..." Explore increased rail, public transport, town and country "depots" to encourage car pooling between Blenheim and outlying communities.

**Relief Sought:** None specified

### **V1-19.3.1.4 - Land Transport, policy 19.3.1.4**

**Clintondale Trust - Participant #: 23 Submission #: 202**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Amend policy to read: "require that all new, or extended roads, or upgrades to existing roads, are appropriate and necessary to provide safe and convenient access; and will avoid future inappropriate development in the rural and coastal environment."

### **V1-19.3.1.12 - Land Transport, new policy 19.3.1.12**

**Marlborough Roads - Participant #: 88 Submission #: 1263**

Development of satellite towns can be counter productive as commuter costs increase. Commuting should be discouraged unless an appropriate land use activity is associated with rural sites e.g. Wairau Valley township.

**Relief Sought:** Commuting should be discouraged unless an appropriate land use activity is associated with rural sites e.g. Wairau Valley township.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 73**

Unable to ascertain the purpose of this policy. Is Council going to get into the role of encouraging small car use etc?

**Relief Sought:** Remove new policy completely.

### **V1-19.3.ex2 - Land Transport, 19.3 explanation 8th paragraph**

**Sherwood, Nancy - Participant #: 61 Submission #: 525**

Agree that subdividers and developers pay roading extensions and upgrades. Water, sewerage and utilities should also be borne by them.

**Relief Sought:** 1. Support subdividers and developers paying for roading extensions and upgrades.  
2. Water, sewage and utilities should also be paid for by subdivider and developers.

### **V1-19.4.dis1 - Land Transport, 19.4 Issue, paragraph 5**

**N Z Institute of Surveyors - Participant #: 3 Submission #: 74**

In paragraph 3 there is an example of putting specific statements in Volume 1 that become

**Relief Sought:** Remove above wording from the existing plan

**Sherwood, Nancy - Participant #: 61 Submission #: 526**

Cycle lanes / bridle paths on new and existing roads.

**Relief Sought:** Require cycle lanes / bridle paths on new and existing roads.

### **V1-19.5.1 - Land Transport, objective 19.5.1**

**Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 244**

Federated Farmers is opposed to any objective that shifts away from upgrading, or building new roads where necessary.

**Relief Sought:** Amend objective 1 to read: "Continue to maintain and build a hierarchical network of roads where necessary."

### **V1-19.5.1.3 - Land Transport, policy 19.5.1.3**

**Clintondale Trust - Participant #: 23 Submission #: 203**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Amend existing policy to read: "To take account of social, cultural and environmental impacts, as well as existing primary production activities, and the economic benefits of such when planning changes to the road network."

**N Z Institute of Surveyors - Participant #: 3 Submission #: 75**

The reason, meaning or need for this change is unclear.

**Relief Sought:** Remove amendment to policy completely

### **V1-19.5.1.4 - Land Transport, new policy 19.5.1.4**

#### **N Z Institute of Surveyors - Participant #: 3 Submission #: 76**

it is impossible to predict future land use changes.

*Relief Sought:* Remove the words "to accommodate future land use changes".

### **V1-19.6 - Land Transport, 19.6 Issue**

#### **E D Townley Limited - Participant #: 85 Submission #: 1176**

It is understood that land transport is an important matter. The provision indicates too much involvement by Transit/Marlborough Roads. The new provision refers to "non-complying residential subdivision" and gives a negative flavour even although the consent process is referred to as the appropriate method of "assessing long term cumulative effects".

*Relief Sought:* Delete provision and reliance on Transit / Marlborough Roads

#### **N Z Institute of Surveyors - Participant #: 3 Submission #: 77**

Not only non-complying but all subdivisions, including controlled and discretionary, can add to traffic flows at intersections. More importantly, land development can affect traffic flows. Cumulative effects are always assessed in applications anyway.

*Relief Sought:* Remove new paragraph completely.

#### **Otuwhero Estate Limited - Participant #: 7 Submission #: 150**

It is understood that land transport is an important matter. The provision indicates too much involvement by Transit/Marlborough Roads. The new provision refers to "non-complying residential subdivision" and gives a negative flavour even although the consent process is referred to as the appropriate method of "assessing long term cumulative effects".

*Relief Sought:* Delete provision and reliance on Transit / Marlborough Roads

### **V1-19.7.1.1 - Land Transport, policy 19.7.1.1**

#### **E D Townley Limited - Participant #: 85 Submission #: 1177**

What is meant by "particularly from a cumulative point of view" and how is it justified?

*Relief Sought:* Delete the provision.

#### **Otuwhero Estate Limited - Participant #: 7 Submission #: 151**

What is meant by "particularly from a cumulative point of view" and how is it justified?

*Relief Sought:* Delete the provision.

#### **Sherwood, Nancy - Participant #: 61 Submission #: 528**

Ad hoc planning does need to be replaced by long term comprehensive planning which takes cumulative effects into account.

*Relief Sought:* Long-term comprehensive planning needs to be undertaken.

### **V1-19.8.gen - Land Transport, 19.8 general**

#### **N Z Institute of Surveyors - Participant #: 3 Submission #: 78**

Policies contained in this section are already adequately dealt with in sections 19.4, 19.5, 19.6 and 19.7 of the Plan

Specific details of arterial routes etc should be in Marlborough Regional Land Transport Strategy where changes can be made without having to change the Plan.

Objective 1, policies 1.1 & 1.2 are too prescriptive and do not allow any flexibility.

Policy 1.5 does not allow for tourism ventures on arterial routes.

Policy 1.6 - symbolic signs do not adequately promote the features of the district.

**Relief Sought:** Remove the new 19.8 completely

**Transit New Zealand - Participant #: 24 Submission #: 215**

Transit supports the new 19.8 explanation under the new issue 19.8, but requests that "Wairau Plain" be changed to "district".

**Relief Sought:** Adopt with the following change - amend the 19.8 explanation to read: "Maintenance of the integrity of the arterial road network of the District".

**V1-19.8 - Land Transport, 19.8 Issue**

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6525**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6584**

**Hadley, J A & J P - Participant #: 63 Submission #: 578**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6748**

**Tu Jaes Trust - Participant #: 64 Submission #: 6454**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6715**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6865**

**Wharehunga Trust - Participant #: 70 Submission #: 6908**

Using the term "inappropriate subdivision" indicates that subdivision occurring anywhere other than on local roads will be considered "inappropriate". Not effects based and does not recognise mitigation.

**Relief Sought:** Delete last two sentences prior to 19.8.1

**V1-19.8.1.1 - Land Transport, new objective 19.8.1.1**

**Transit New Zealand - Participant #: 24 Submission #: 216**

Transit supports new objective 19.8.1, but requests the addition of the words "and Awatere".

**Relief Sought:** Amend to read: "maintain the integrity of the arterial road network of the Wairau Plan and Awatere".

**V1-19.8.1.1.1 - Land Transport, new policy 19.8.1.1.1**

**Clintondale Trust - Participant #: 23 Submission #: 204**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Amend new policy to read: "Prevent subdivision and new, or significant changes to existing land use activities that will adversely affect the integrity of the arterial road network, particularly

ribbon development along arterial roads."

**Marlborough Roads - Participant #: 88 Submission #: 1264**

Policy is supported.

**Relief Sought:** Support

**Transit New Zealand - Participant #: 24 Submission #: 217**

Transit supports the new policies associated with objective 19.8.1.

**Relief Sought:** Support

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

Replace this policy.

**Relief Sought:** Replace policy 1.1 with "enhance and create roads where necessary".

### **V1-19.8.1.1.2 - Land Transport, new policy 19.8.1.1.2**

**Marlborough Roads - Participant #: 88 Submission #: 7004**

Policy is supported.

**Relief Sought:** Support

**Transit New Zealand - Participant #: 24 Submission #: 5671**

Transit supports the new policies associated with objective 19.8.1

**Relief Sought:** Support

### **V1-19.8.1.1.3 - Land Transport, new policy 19.8.1.1.3**

**Marlborough Roads - Participant #: 88 Submission #: 7005**

Policy is supported.

**Relief Sought:** Support

**Transit New Zealand - Participant #: 24 Submission #: 5672**

Transit supports the new policies associated with objective 19.8.1.

**Relief Sought:** Support

### **V1-19.8.1.1.4 - Land Transport, new policy 19.8.1.1.4**

**Marlborough Roads - Participant #: 88 Submission #: 7006**

Policy is supported.

**Relief Sought:** Support

**Transit New Zealand - Participant #: 24 Submission #: 5673**

Transit supports the new policies associated with objective 19.8.1.

**Relief Sought:** Support

### **V1-19.8.1.1.5 - Land Transport, new policy 19.8.1.1.5**

**Marlborough Roads - Participant #: 88 Submission #: 7007**

Policy is supported.

**Relief Sought:** Support

**Transit New Zealand - Participant #: 24 Submission #: 5674**

Transit supports the new policies associated with objective 19.8.1

**Relief Sought:** Support



### V1-19.8.1.1.6 - Land Transport, new policy 19.8.1.1.6

#### Marlborough Roads - Participant #: 88 Submission #: 1265

Reference to "symbolic signs" should be changed.

*Relief Sought:* Replace "symbolic signs" with "internationally recognised signage".

#### Transit New Zealand - Participant #: 24 Submission #: 5675

Transit supports the new policies associated with objective 19.8.1.

*Relief Sought:* Support

### V1-19.8.1ex - Land Transport, 19.8.1 explanation

#### Transit New Zealand - Participant #: 24 Submission #: 5676

Transit supports the new policies associated with objective 19.8.1, but request that "Rural 4" be added after the words "Rural 3".

#### Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6568

#### Hadley Reese Partnership - Participant #: 66 Submission #: 6644

#### Hadley, J A & J P - Participant #: 63 Submission #: 5688

#### J A Hadley Family Trust - Participant #: 68 Submission #: 6737

#### Tu Jaes Trust - Participant #: 64 Submission #: 6448

#### Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6669

#### Wharehunga Forestry Limited - Participant #: 69 Submission #: 6819

#### Wharehunga Trust - Participant #: 70 Submission #: 6930

Using the term "inappropriate subdivision" indicates that subdivision occurring anywhere other than on local roads will be considered "inappropriate". Not effects based and does not recognise mitigation.

*Relief Sought:* Delete last sentence of explanation commencing "it follows that appropriate...".

### V1-19.11 - Land Transport, 19.11, bullet points

#### Transit New Zealand - Participant #: 24 Submission #: 218

Transit supports the new anticipated environmental result .

*Relief Sought:* Support

### V1-23-Gen - Subdivision and Development-General Comments

#### Adams Land Nursery & P D & M Lloyd - Participant #: 46 Submission #: 454

The council should reduce the size of Rural Residential blocks down from 1ha to 4000m<sup>2</sup> (1 acre) to reduce the pressure on the high demand for those blocks. This doubles or more the area

*Relief Sought:* Reduce Rural Residential lot sizes to 4000m<sup>2</sup>.

#### Dodson, R C & J W - Participant #: 31 Submission #: 332

Council seems to have lost the aim - sustainable management. The 8ha area is not sacrosanct. Times and conditions change. It 8ha really an efficient commercial vineyard area? It 8ha not too big for a lifestyle block?

In rural zones 3 & 4 there are plenty of allotments less than 8ha which do not cause any problems.

The council must justify the 8ha area - cost/ benefit etc. This is not in the details of variation 38. Council has the controls for most of these points - building permits, road access, waste water management, water supply, noise, farming effects. Just use them effectively.

This proposal will not stop any more rural "village" development. What if the ferries came to Clifford Bay? Can Ward subdivide and expand?

Lifestylers should be encouraged to use the surrounding areas above the flat lands and away from intensive farm operations.

There are plenty more lifestyle sites (in Blind River area) above the vineyards with house. The flats and easy downs in vines are not much use for farming. The present proposal which basically states no lifestyle blocks in rural zones is not acceptable.

**Relief Sought:** None specified

**H & J Meyers Partnership - Participant #: 2 Submission #: 10**

Can't understand that the eight hectare limit is still considered to be appropriate. Where there exists established rural/residential lots of smaller scale even down to under half hectare lots, consideration should be given to subdivision under the eight hectare limit to give a softening or gentle transition from "residential development" to "Rural Residential" to "rural".

**Relief Sought:** Consideration should be given to subdivision under the eight hectare limit to give a softening or gentle transition from "residential development" to "Rural Residential" to "rural".

**H & J Meyers Partnership - Participant #: 2 Submission #: 11**

The other matter not covered in the report is the Standard Requirement for Subdivision and Development Rule 2.18.2.2 "a condition of consent "may be imposed" where land along streams may have significant natural values and serve as important habitats and where subdivision occurs . This would seem a mandatory requirement and could be judged an invasion and hindrance to maintaining and enhancing the natural functioning of habitat. It is noted on pg 27 of the section 32 report that "landowners taking an active part in restoration and enhancement activities. The Council has not seen the need to introduce a regulatory approach in the Plan to require restoration and enhancement activities to occur".

**Relief Sought:** None specified

**Mason, Ralph Douglas - Participant #: 216 Submission #: 5403**

The current 8ha in Rural Zone 3 and 16ha in Rural Zone 4 is too small. Any further subdivision in Rural Zone should not be allowed except under very special circumstances e.g. protected significant features; odd sized title.

Further subdivision is detrimental to future production. Rural 4 should have a size minimum that would keep it viable for production e.g. 50ha. Wairau Plain is already subdivided enough.

**Relief Sought:** Increase the minimum subdivision sizes in Rural 3 from 8ha, and in Rural 4 from 16ha to 50ha.

**Weyerhaeuser New Zealand Limited - Participant #: 84 Submission**

WNZI supports changes to chapter 23. Land adjacent to forests is being fragmented to allow for lifestyle subdivisions and many new residents expect that the rural environment is "static". Forest harvesting is a legitimate rural land use occurring every 30 years. This results in an intensive short-term use of resources and associated minor adverse effects.

**Relief Sought:** Support

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

**SUBDIVISION**

Minimum allotments sizes of 8ha and 20ha needs review as there are now many allotments less than this ,and wider variation in other regions The 8ha approach is inflexible and unsustainable. Economic size is highly variable and there are other uses which could result in satisfactory economic returns. Also the disposal of property to give the greatest return to the owner is a property right.

Restricting subdivision and development to the present availability of roading is contrary to the

**Relief Sought:** Minimum allotments sizes of 8ha and 20ha needs review

## V1-23.3 - Subdivision and Development, 23.3 Issue

### Horticulture New Zealand - Participant #: 27 Submission #: 282

Chapter 23 refers to "natural features". Given that natural features are a distinct consideration under section 6b of the RMA it is considered the term "natural resources" would be more appropriate. Policy 1.4 refers to provision for new lots associated within significant environmental feature and it would be better that "natural features" be replaced with "significant environmental

**Relief Sought:** Replace "natural features" in 23.3 first sentence with "natural resources".

### Royal Forest & Bird Protection Society of New Zealand - Participant #: 28

#### Submission #: 311

Oppose and replace.

**Relief Sought:** Replace issue with the following: "The pattern of subdivision can have an impact on the natural values of the land, including natural character, significant natural areas, and indigenous biological diversity. Subdivisions adjacent to rivers and streams and involving land containing wetlands can have major adverse effects."

## V1-23.3.1.1.3 - Subdivision and Development, policy 23.3.1.1.3

### Royal Forest & Bird Protection Society of New Zealand - Participant #: 28

#### Submission #: 312

Support with amendments.

**Relief Sought:** Amend policy to read: "Ensure that works associated with land subdivision processes avoid, remedy or mitigate adverse effects on the natural value qualities of the environment, particularly natural ground levels, surface vegetation, water quality, and protect the natural character of streams and indigenous biological diversity."

## V1-23.3.1.1.4 - Subdivision and Development, new policy 23.3.1.1.4

### Department of Conservation - Participant #: 229 Submission #: 5452

New policy is supported. The policy may be qualified by referring to "significant" natural features. Inclusion of hazard areas is at odds with the main purpose of the policy. It is suggested that this reference is deleted. It would be more appropriate to include policies relating to hazard areas under issue 23.2.

**Relief Sought:** Amend policy 1.4 to read: "Provide for the creation of allotments which protect significant natural features, including bush, riparian lands, wetlands, and other natural habitats and ecosystems, headlands, heritage features, and ridges."

### Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 249

Federated Farmers supports the protection of significant environmental features, however the Federation feels this approach could gain further clarity by linking Subdivision rule 3.7 more strongly with 23.3.1.1.4 - and keeping the wording consistent. This would make the meaning of significant environmental features more precise.

**Relief Sought:** Replace "natural features" with "significant environmental features".

### Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 245

Federated Farmers feels the reference to "natural features" could be caught by section 6(b) of the RMA. Adopting the suggested amendment gives more clarity also to 3.7.2 - the protection of significant environmental features.

**Relief Sought:** References to "natural features" be changed to "significant environmental features" or words to that effect.

### Horticulture New Zealand - Participant #: 27 Submission #: 280

Chapter 23 refers to "natural features". Given that natural features are a distinct consideration under section 6b of the RMA it is considered the term "natural resources" would be more appropriate. Policy 1.4 refers to provision for new lots associated within significant environmental feature and it would be better that "natural features" be replaced with "significant environmental

**Relief Sought:** Replace "natural features" with "significant environmental features".

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28  
Submission #: 313**

Support with amendments.

**Relief Sought:** Amend policy to read: "Provide for the creation of allotments which protect natural features and landscapes including indigenous vegetation, riparian lands, wetlands, headlands, heritage features, ridges, hazard areas, and geomorphological characteristics."

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**  
This is contrary to section 6 RMA.

**Relief Sought:** Delete.

### **V1-23.3.1.para1 - Subdivision and Development, 23.3.1 explanation, 2nd paragraph**

**Department of Conservation - Participant #: 229 Submission #: 5453**  
Amendments to the second paragraph are supported.

**Relief Sought:** Retain the second paragraph of the explanation (and amendments).

**N Z Institute of Surveyors - Participant #: 3 Submission #: 79**  
This amendment is poorly worded. What exactly is a "minute percentage".

**Relief Sought:** 1. Remove "There is only a minute percentage of the original amount of wetlands remaining in eastern Marlborough" and;  
2. Remove "subdivision and" in next sentence.

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28  
Submission #: 314**  
Support.

**Relief Sought:** None specified

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6527**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6648**

**Hadley, J A & J P - Participant #: 63 Submission #: 579**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6732**

**Tu Jaes Trust - Participant #: 64 Submission #: 6465**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6718**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6849**

**Wharehunga Trust - Participant #: 70 Submission #: 6912**  
"eastern Marlborough" is not defined.

**Relief Sought:** Identify in planning maps if possible.

### **V1-23.3.1.para2 - Subdivision and Development, 23.3.1 explanation, new paragraph**

**Horticulture New Zealand - Participant #: 27 Submission #: 283**

Chapter 23 refers to "natural features". Given that natural features are a distinct consideration under section 6b of the RMA it is considered the term "natural resources" would be more appropriate. Policy 1.4 refers to provision for new lots associated within significant environmental feature and it would be better that "natural features" be replaced with "significant environmental

**Relief Sought:** Replace "natural features" in new paragraph in 23.3.1 with "natural resources".

**N Z Institute of Surveyors - Participant #: 3 Submission #: 80**

The physical act of subdivision does not impact on natural features. It is the development of the site that has the effect.

**Relief Sought:** Remove the word "subdivision" and replace with "potential impact of development on".

**V1-23.4 - Subdivision and Development, 23.4 Issue****E D Townley Limited - Participant #: 85 Submission #: 1178**

The plan uses the words "inappropriate forms of subdivision development can have adverse impacts on the environment...and the working rural landscape and can also have significant legal costs of providing services". Nowhere it is identified what is an "inappropriate form" of subdivision, what "adverse impacts" it can have, and how such an effect can be had on "the working rural landscape" or the cost of "providing services". The provision is worded without justification.

**Relief Sought:** Delete provision.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 81**

Wording for the amendment is unclear - what is the "working rural landscape"?

**Relief Sought:** Provide a definition for "working rural landscape".

**New Zealand Winegrowers - Participant #: 39 Submission #: 422**

NZ Winegrowers supports the amendment. However inappropriately zoned subdivision can also adversely impact on the productive and life supporting capacity of the soils in the rural zone.

**Relief Sought:** Amend the last sentence of the discussion to read: "Inappropriate forms of subdivision development can have adverse impacts on the environment, on the working rural landscape and particularly on the productive and life supporting capacity of the soils within the rural zone."

**Otuwhero Estate Limited - Participant #: 7 Submission #: 152**

The plan uses the words "inappropriate forms of subdivision development can have adverse impacts on the environment...and the working rural landscape and can also have significant legal costs of providing services". Nowhere it is identified what is an "inappropriate form" of subdivision, what "adverse impacts" it can have, and how such an effect can be had on "the working rural landscape" or the cost of "providing services". The provision is worded without justification.

**Relief Sought:** Delete provision.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6557****Hadley, J A & J P - Participant #: 63 Submission #: 580****J A Hadley Family Trust - Participant #: 68 Submission #: 6734****Tu Jaes Trust - Participant #: 64 Submission #: 6452****Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6722****Wharehunga Forestry Limited - Participant #: 69 Submission #: 6802****Wharehunga Trust - Participant #: 70 Submission #: 6911**

"Working rural landscapes" is not defined. This term appears with frequency elsewhere and is unhelpful.

**Relief Sought:** 1. Delete or define and explain the term. Refer to the original background document text (draft variation, July 2004, page 70) and include. This text puts "working rural landscape" for Rural 3 in context.  
2. Develop and include similar explanation for working rural landscape in Rural 4.

**Alexander, M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

Imprecise and unclear.

**Relief Sought:** Review this policy.

## V1-23.4.1.1.5 - Subdivision and Development, policy 23.4.1.1.5

### **Clintondale Trust - Participant #: 23 Submission #: 205**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Amend policy to read: "Ensure that the working rural landscape, primary production activities, and related amenities are protected and enhanced."

### **E D Townley Limited - Participant #: 85 Submission #: 1179**

The proposed wording is not understandable as a result of the confusion from the changes to 23.4

**Relief Sought:** Delete the provision

### **N Z Institute of Surveyors - Participant #: 3 Submission #: 83**

Wording for this amendment is not clear. What is the "working rural landscape"?

**Relief Sought:** Provide a definition for "working rural landscape".

### **Otuwhero Estate Limited - Participant #: 7 Submission #: 153**

The proposed wording is not understandable as a result of the confusion from the changes to 23.4

**Relief Sought:** Delete the provision

### **Weyerhaeuser New Zealand Limited - Participant #: 84 Submission**

WNZI supports changes to chapter 23. Land adjacent to forests is being fragmented to allow for lifestyle subdivisions and many new residents expect that the rural environment is "static". Forest harvesting is a legitimate rural land use occurring every 30 years. This results in an intensive short-term use of resources and associated minor adverse effects.

**Relief Sought:** Support

### **Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6573**

### **Hadley Reese Partnership - Participant #: 66 Submission #: 6645**

### **Hadley, J A & J P - Participant #: 63 Submission #: 581**

### **J A Hadley Family Trust - Participant #: 68 Submission #: 6750**

### **Tu Jaes Trust - Participant #: 64 Submission #: 6464**

### **Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6721**

### **Wharehunga Forestry Limited - Participant #: 69 Submission #: 6795**

### **Wharehunga Trust - Participant #: 70 Submission #: 6906**

"Working rural landscapes" is not defined. This term appears with frequency elsewhere and is unhelpful.

**Relief Sought:** 1.Delete or define and explain the term. Refer to the original background document text (draft



variation, July 2004, page 70) and include. This text puts "working rural landscape" for Rural 3 in context.

2. Develop and include similar explanation for working rural landscape in Rural 4.

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

This policy is arbitrary and restrictive. The policy makes landscape a compulsory issue, not voluntary as claimed.

**Relief Sought:** Delete.

### **V1-23.4.1.1.8 - Subdivision and Development, new policy 23.4.1.1.8**

**Department of Conservation - Participant #: 229 Submission #: 5454**

New policy is supported.

**Relief Sought:** retain new policy 1.8.

**Transpower New Zealand Limited - Participant #: 25 Submission #: 230**

Transpower supports new policy 1.8.

**Relief Sought:** Retain policy

### **V1-23.4.1.ex2 - Subdivision and Development, 23.4.1 explanation, new paragraph**

**N Z Institute of Surveyors - Participant #: 3 Submission #: 82**

The wording in this paragraph does not need to be so specific.

**Relief Sought:** Amend this paragraph to read: "The area of land required for utility sites can vary, according to the type of utility to be accommodated. It is important that there is flexibility in the subdivision controls to allow this to happen."

**New Zealand Winegrowers - Participant #: 39 Submission #: 423**

The last explanatory paragraph creates an inconsistency with the previous paragraphs. A minimum lot size of 8ha should be maintained throughout the rural zones to ensure that versatile soils are maintained for productive purposes. It's not necessary for subdivision to take place in order to properly provided for utilities, conservation or flood protection matters. Such matters can be dealt with either by specific zoning provisions or by encumbrances or other private property agreements as required.

**Relief Sought:** Delete the whole last explanatory paragraph.

### **V1-23.7 - Subdivision and Development, 23.7 AER**

**Haymes, Graeme - Participant #: 231 Submission #: 5467**

Council have failed to correct this variation to reflect the late inclusion of the Rural 4 zone. In an overall sense, the paragraph does not need amending.

**Relief Sought:** Delete the amendment from the first bullet point: "and particularly in concert with the expected working, rural landscape of the Rural 3 Zone."

**N Z Institute of Surveyors - Participant #: 3 Submission #: 84**

This variation is for both the Rural 3 & 4 Zones and there is no need to highlight the Rural 3 Zone.

**Relief Sought:** Remove the amendments to bullet points 1 & 2.

**New Zealand Winegrowers - Participant #: 39 Submission #: 424**

For subdivision to be provided on the basis that it is "in concert with the expected working rural landscape of the Rural 3 zone", it is important to specifically provide that subdivision should not adversely affect the productive capacity of the soils within the Rural 3 zone.

**Relief Sought:** Add the following to the end of bullet one: "...and should not adversely affect the productive capacity of the soils in the Rural 3 zone."

**Transit New Zealand - Participant #: 24 Submission #: 219**

Transit supports the amended AERs but requests that "and Rural 4 zone" be added after "Rural 3 zone".

**Relief Sought:** Add "and Rural 4 zone" after "Rural 3 zone" in the second bullet point.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6572**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6630**

**Hadley, J A & J P - Participant #: 63 Submission #: 582**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6739**

**Tu Jaes Trust - Participant #: 64 Submission #: 6469**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6719**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6822**

**Wharehunga Trust - Participant #: 70 Submission #: 6902**

"Working rural landscapes" is not defined. This terms appears with frequency elsewhere and is unhelpful.

**Relief Sought:** 1.Delete or define and explain the term. Refer to the original background document text (draft variation, July 2004, page 70) and include. This text puts "working rural landscape" for Rural 3 in context.  
2. Develop and include similar explanation for working rural landscape in Rural 4.

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

This is arbitrary and restrictive. The policy makes landscape a compulsory issue, not voluntary as claimed.

**Relief Sought:** Delete the amendments.

**V2-AL - Appendix L, Schedule of Rose Street West Properties**

**Outer Limits Limited - Participant #: 48 Submission #: 477**

**Relief Sought:** Amend list of properties to include only those in the reduced area to be rezoned Urban Residential.

**V2-Def-Gen - Definitions-General Comments**

**Blenheim Backpackers Collective - Participant #: 78 Submission #: 1086**

Overcrowded, unhygienic, unsafe, unregulated accommodation proliferates in Marlborough and is potentially detrimental to neighbours and those accommodated in it.

The new definitions do not meet the objectives of chapter 11 of the plan as reviewed.

The new definitions need to recognise that visitor accommodation and worker accommodation in urban areas are often one and the same.

New definitions could ensure that budget accommodation providers meet the same criteria for the safety and well-being of their guests.

New definitions could give the council more robust avenues and the authority to act on these accommodation problems.

**Relief Sought:** 1.The new definitions need to recognise that visitor accommodation and worker accommodation in urban areas are often one and the same.  
2.New definitions could give the council more robust avenues and the authority to act on these

accommodation problems.

3. New definitions could ensure that budget accommodation providers meet the same criteria for the safety and well-being of their guests.

4. New definitions could give the council more robust avenues and the authority to act on these accommodation problems.

**Clintondale Trust - Participant #: 23 Submission #: 5668**

In order to pre-empt the potential for conflict or abuse, the terms "temporary" and "dependent relative" need to be unequivocally defined, having regard to the extent of transient labour required for the seasonal primary production activities. The latter term is significant having regard to the increasing propensity for extended and ill defined family and partnership relationships.

**Relief Sought:** Include unambiguous definitions for the terms "temporary" and "dependent family" with specific reference to Rural Residential activity.

**Department of Conservation - Participant #: 229 Submission #: 5429**

The plan would be clearer and less open to interpretation if it adopted a more consistent approach to describing natural values etc. Where appropriate, natural value terms should be replaced by "natural habitats and ecosystems" or "indigenous biodiversity". There are advantages to using these terms consistently throughout the plan.

A definition of biodiversity should be added, consistent with the RMA. A definition for indigenous should also be added.

**Relief Sought:** 1. Use the terms "natural habitats and ecosystems" and "indigenous biodiversity" consistently in the plan.

2. Add a new definition for "biodiversity as follows:

"Biodiversity - means the variability among living organisms, and the ecological complexities of which they are a part, including diversity within species, between species, and of ecosystems.

3. Add a new definition for "indigenous" as follows:

**Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 246**

Federated Farmers feels that "working rural landscapes" referred to in 23.4.1.1.5 has different meanings for different people. Often these meanings are unrealistic of a true working rural landscape. This misconception of a working rural landscape can lead to issues such as reverse sensitivity.

**Relief Sought:** Add a new definition in the plan for "rural working landscape" that clearly identifies what can be expected when living in a "rural working landscape" such as: smells, noise, smoke, sprays, fertilizers, irrigation, harvesting etc.

**Horticulture New Zealand - Participant #: 27 Submission #: 281**

Chapter 23 refers to "natural features". Given that natural features are a distinct consideration under section 6b of the RMA it is considered the term "natural resources" would be more

**Relief Sought:** Add a new definition for "significant environmental features" as follows: "a significant environmental feature may include bush, riparian land, wetlands, headlands, heritage features and ridges."

**Horticulture New Zealand - Participant #: 27 Submission #: 271**

Throughout the plan there are references to the "working rural landscape" and the need for it to be considered in the context of a range of activities. Yet it is not defined. It needs to be clear what comprises or makes up the "working rural landscape" so there is certainty as to the outcomes anticipated.

It would appear to be more the rural character that is being described - key components that make the rural area unique. Such character includes smells and noises.

**Relief Sought:** Add a new definition for "rural working landscapes" as follows: "Rural working landscape includes those components of the rural productive environment that give its distinct rural character including:

- a) a predominance of natural features over human made features;
- b) high ratio of open space relative to the built environment;
- c) significant areas of vegetation in pasture, crops, forestry and / or indigenous vegetation;
- d) a rural working production unit;
- e) presence of farmed animals;
- f) noises, smells and effects associated with the use of rural land for a wide range of agricultural, horticultural and forestry purposes;
- g) low population densities relative to urban areas;
- h) existence of some narrow and / or unsealed roads;
- i) general lack of urban infrastructure."

**N Z Institute of Surveyors - Participant #: 3 Submission #: 85**

Add a new definition for ancillary unit as follows:

"A self contained unit, ancillary to a dwelling house, and of a size no larger than 200sq. metres GFA, held on the same Certificate of Title as a dwelling house and which may be located within the structure of a dwelling. Only one ancillary unit should be permitted per Certificate of Title. Should subdivision result in separate titles, then the permitted status of the ancillary building is removed."

**Relief Sought:** Add a new definition for ancillary unit as follows: " A self contained unit, ancillary to a dwelling house, and of a size no larger than 200sq. metres GFA, held on the same Certificate of Title as a dwelling house and which may be located within the structure of a dwelling. Only one ancillary unit should be permitted per Certificate of Title. Should subdivision result in separate titles, then the permitted status of the ancillary building is removed."

**O'Malley, Kaye - Participant #: 62 Submission #: 533**

Wineries are fundamentally all about the production of drink. The plan's current definition, on page 18, does not recognise this aspect. The definition should be changed to include the production aspect.

**Relief Sought:** Amend the definition for "wineries" to read: "premises for the production of wine, which can include marketing, retail sales and associated dining facilities."

**Radich Family Trust - Participant #: 17 Submission #: 180**

The undertaking of a home occupation and professional offices in Rural 3 & 4 have long been permitted uses. Where a home occupation is unobjectionable or where professional offices are unobjectionable they should be allowed. It is unlikely that they would be objectionable as there are not likely to be traffic noise or other adverse effects.

**Relief Sought:** 1. Add a new definition for professional offices as follows: " means offices out of which professional services are provided. Professional services shall include the provision of medical, dentistry, legal, accounting, agricultural advisory, viticulture advisory and other advisory services, physiotherapy chiropractic and the like. Professional offices may only be established and continued while a principal provider of such services has his or her home on the site.

2. There should be a prohibition on subdivision for the purposes of home occupation or professional offices meaning that normal subdivision criteria shall apply.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6564**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6650**

**Hadley, J A & J P - Participant #: 63 Submission #: 5690**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6755**

**Tu Jaes Trust - Participant #: 64 Submission #: 6443**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6675**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6808**

**Wharehunga Trust - Participant #: 70 Submission #: 6905**

No reasons are given to justify the removal of professional offices and veterinary clinics from Rural 3 & 4 zones. The home occupation definition change creates a new level of professional offices. Also "professional offices" not defined, which might result in confusion with this activity being

captured under commercial activity status.

**Relief Sought:** Provide a separate definition for "professional offices".

## **V2-Def-2 - Definitions-Home Occupation**

### **New Zealand Winegrowers - Participant #: 39 Submission #: 425**

This is unduly restrictive in that it allows only one additional non-resident person, it is possible and highly likely that a home occupation requires more than one non-resident person, up to 3 or 4 employees, without generating any adverse effects or requiring any additional resources.

**Relief Sought:** Amend the definition of home occupation to read: "home occupation - performed by not more than three non-residential persons."

### **O'Malley, Kaye - Participant #: 62 Submission #: 529**

The term "offensive odours" should also be included. This appears to be why the fish processing and rubbish collection activities have been excluded from being a home occupation.

**Relief Sought:** Add "and offensive odours" at the end of the definition for home occupation.

### **Radich Family Trust - Participant #: 17 Submission #: 178**

The undertaking of a home occupation and professional offices in Rural 3 & 4 have long been permitted uses. Where a home occupation is unobjectionable or where professional offices are unobjectionable they should be allowed. Some occupations & offices will be for the purpose of servicing rural clients. It is unlikely that they would be objectionable as there are not likely to be traffic noise, or other adverse effects.

The carrying out of a profession should be allowed as long as there are reasonable limitations on scale and so long as residency is linked with use.

**Relief Sought:** 1. Amend the definition of home occupation as follows:

" means an occupation, business, trade, craft, or profession which meets the following criteria:

- a) it may not be an escort agency or a brothel.
- b) it may not involve work on motor vehicles, boats, aircraft, or machinery.
- c) it may not involve chemical processing.
- d) it may not involve the accumulation of goods for collection and sale,
- e) it may not involve the processing of fish meat or dairy products.
- f) it must have as a principal person in the business someone who has their home on the site.

2. There should be a prohibition on subdivision for the purposes of home occupation or professional offices meaning that normal subdivision criteria shall apply.

### **Sutherland, R D - Participant #: 219 Submission #: 5407**

Oppose the definition for home occupation. It is unreasonable to target small business and it affects part time workers. It has the potential to significantly increase costs to small business & is not effects based.

**Relief Sought:** Delete the following words: "only by not more than one non-resident person".

### **Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6551**

### **Hadley Reese Partnership - Participant #: 66 Submission #: 6633**

### **Hadley, J A & J P - Participant #: 63 Submission #: 583**

### **J A Hadley Family Trust - Participant #: 68 Submission #: 6745**

### **Tu Jaes Trust - Participant #: 64 Submission #: 6474**

### **Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6691**

### **Wharehunga Forestry Limited - Participant #: 69 Submission #: 6823**

### **Wharehunga Trust - Participant #: 70 Submission #: 6898**

Placing limitations on the number of people performing the activity has the potential to impact negatively on a number of small business operators, if resource consents are required. The proposed change will make all home based businesses employing more than one person a discretionary activity at the least. The amendment is detrimental to part-time employment opportunities and is, not effects based, no analysis of cost or benefits, and no consideration of

alternatives or consultation with affected groups.

**Relief Sought:** Remove change

### **V2-Def-3 - Definitions-Homestay**

**Jerram P & A - Participant #: 6 Submission #: 108**

The Plan as we see it seems to differentiate those catering for 5 or more tourist from everyone else. There is a clear need for more 1 & 2 bedroom self catering home stays or cottages as many tourists do not want to stay in motels, peoples houses nor B & B's but wish to retain the independence that self catering gives them.

**Relief Sought:** The Plan should not make it difficult to accommodate these important tourists.

### **V2-Def-4 - Definitions-Residential Activity**

**E D Townley Limited - Participant #: 85 Submission #: 6996**

Worker accommodation should also be a permitted activity in Rural 3 & 4 zones.

**Relief Sought:** Inset "worker accommodation" into the definition of residential activity in the definitions.

**O'Malley, Kaye - Participant #: 62 Submission #: 530**

This definition is not intended to cover the activity described in the new definition for "worker accommodation". The exclusion component should now have the new "worker accommodation" term added.

**Relief Sought:** Amend the definition for residential activity as follows: "...but does not include worker accommodation, visitor accommodation, camping grounds...".

**Otuwhero Estate Limited - Participant #: 7 Submission #: 5660**

Worker accommodation should also be a permitted activity in Rural 3 & 4 zones.

**Relief Sought:** Inset "worker accommodation" into the definition of residential activity in the definitions.

**Stokes, Christopher Francis - Participant #: 217 Submission #: 5405**

Oppose the inclusion of "rest homes" in the definition of "community facility".

Previously rest homes were covered by the definition of residential activity and would be a permitted activity.

Community facilities within the urban environment section are discretionary and would require resource consent.

Mr Versteegh has expressed a strong view [affidavit attached] as to the objectives and policies of the plan recognising the wish for many people to live in different ways. He states his opinion that rest homes treated as permitted activities would not be outside the intention of the plan. Since those court proceedings, council has treated rest homes as permitted activities. The minor alteration will have a dramatic change on the ability of elderly people to have their accommodation met.

The effect of a minor alteration to the definition will have a dramatic change on the ability of elderly people who need care to have their accommodation needs met in a similar manner to those who live in traditional type housing.

It is difficult to understand how such a dramatic change can occur when policies remain the same.

The title of the variation is misleading. It states the variation relates to rural issues. Only when wading through the s32 analysis is reference made to residential activity. Unless this is linked to an existing knowledge of the Proposed Plan, this could simply have slipped through with the summary introduction being in regard to rural issues only.



It is submitted there is no s32 analysis for the change of definition, or if there is one, it is inadequate.

It is inappropriate for rest homes to be included in community facilities, as a non-residential activity.

**Relief Sought:** Include "rest home" within the definition of "residential activity, and/or delete "rest home" from the definition of "community facility".

## **V2-Def-5 - Definitions-Residential Unit**

### **E D Townley Limited - Participant #: 85 Submission #: 1180**

The effect of removing "family flat" is to throw the baby out with the bath water. There is no reason why dependent family accommodation should be removed from the definition. The ability to provide a residential unit for a worker accommodated in secondary accommodation on a site should be retained.

**Relief Sought:** Amend definition to re-include secondary accommodation on each site for dependent relatives, family members or workers.

### **Monk, Craig & Jo - Participant #: 72 Submission #: 1011**

Oppose this amendment. It should remain the same as it would be a breach of our rights as a landowner.

**Relief Sought:** Delete amendment.

### **New Zealand Winegrowers - Participant #: 39 Submission #: 426**

It is foreseeable that one residential unit contains more than one kitchen facility and it is not appropriate to restrict the definition to permit only one kitchen facility.

**Relief Sought:** Delete the second sentence in the definition of residential unit, relating to deeming the provision of more than one kitchen facility as comprising more than one residential unit.

### **Otuwhero Estate Limited - Participant #: 7 Submission #: 154**

The effect of removing "family flat" is to throw the baby out with the bath water. There is no reason why dependent family accommodation should be removed from the definition. The ability to provide a residential unit for a worker accommodated in secondary accommodation on a site should be retained.

**Relief Sought:** Amend definition to re-include secondary accommodation on each site for dependent relatives, family members or workers.

### **Williams, Peter & Dianne - Participant #: 71 Submission #: 1007**

Oppose this amendment. It should remain the same as it would be a breach of our rights as a landowner.

**Relief Sought:** Delete amendment.

### **Gane, Graeme & Raewyn - Participant #: 36 Submission #: 6966**

### **Gane, Laurin - Participant #: 37 Submission #: 6971**

### **Gane, Nev & Jenni - Participant #: 34 Submission #: 6956**

### **Large, Marie - Participant #: 38 Submission #: 6976**

### **Large, Matthew - Participant #: 32 Submission #: 6946**

### **Marfell, Bridget - Participant #: 33 Submission #: 6951**

### **Marfell, T S & J M - Participant #: 42 Submission #: 447**

### **Markview Vineyard - Participant #: 29 Submission #: 325**

### **Morris, Melanie - Participant #: 30 Submission #: 6941**

### **Wratt, Quentin - Participant #: 35 Submission #: 6961**

The amendment to the definition of residential unit is opposed. There is no justification for the removal of the concept of a "family flat".

**Relief Sought:** Oppose

## V2-Def-6 - Definitions-Visitor Accommodation

### **Blenheim Backpackers Collective - Participant #: 78 Submission #: 1084**

BBC opposes this definition. The purpose of the rules do not change simply because visitors decide to seek temporary work in the area. "Visitor" should include NZ non-residents regardless of length of stay.

*Relief Sought:* Add the following to the definition: "It includes (but is not limited to), motels, holiday flats, motor and tourist lodges, hostels and long-term accommodation for NZ non-residents."

## V2-Def-7 - Definitions-Accessory Building

### **O'Malley, Kaye - Participant #: 62 Submission #: 531**

It is reasonable and realistic to include the term "sleep out". Historically sleep outs made up the bulk of what we know as accessory buildings in urban New Zealand. The Oxford Dictionary supports the notion in that it explicitly states "providing sleeping accommodation". It does not refer

*Relief Sought:* Amend the definition for accessory building to include sleep out as follows: "...Such buildings include a sleep out, garages and garden sheds."

## V2-Def-8 - Definitions-Workers Accommodation

### **Blenheim Backpackers Collective - Participant #: 78 Submission #: 1085**

BBC opposes this definition. It does not meet objective 2, policy 2.8 as by definition it can only be provided on a rural property.

The Centre for Housing Research Aotearoa NZ report (August 2006) states that council has a preference for workers accommodation to be located in areas with existing infrastructure. The new definition does not address the concerns in the report or the concerns that have been brought to council's attention over recent years. The definition should be expanded to include the urban

*Relief Sought:* 1. Change worker accommodation to a controlled activity.

2. Amend the definition for worker accommodation to include: "...premises accommodating 6 or more unrelated people paying individual tariffs where the premises generate above market force rent for commercial gain."

### **Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 5677**

In respect of the last paragraph, Federated Farmers feels it is completely unreasonable to expect permanent rural workers to find accommodation in a township. Travel times for workers from a township to farm could be quite considerable - up to 1.5hrs in some areas. Furthermore, working on a farm can require late night callouts to tend to young animals etc. Not having workers accommodation as an option could make finding employees difficult, as this is often an expectation of workers.

Travel cost is rising dramatically and could provide uneconomical. Also forcing rural workers to live in townships will only increase the amount of traffic using roads, which is contrary to council's aim of maintaining the integrity and safety of the road network. Having fatigued workers travelling from a town to a farm in the middle of the night to tend young animals may reduce the safety of roads.

*Relief Sought:* Add a new definition for "worker accommodation", clearly defining permanent farm employees from seasonal workers so permanent workers are not caught by the definition.

2. Change the definition of "worker accommodation: to refer only to seasonal workers

### **Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 240**

Federated Farmers is concerned that only allowing one dwelling unit per title is constrictive, and places costs on workers that travel to and from townships. Once again, permanent farm employee accommodation should be situated in rural areas as an option for permanent workers that may work odd hours etc.

*Relief Sought:* Amend the definition for "worker accommodation" to refer only to seasonal workers, so that

permanent farm employees are not caught by the definition.

**Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 247**

Federated Farmers feels that the definition should include the mention of "kitchen" for clarity. Also, the definition is confused by mention of workers accommodation on the property.

The federation also feels that the definition of worker accommodation should be separated so that seasonal workers are considered separate to permanent farm employees.

**Relief Sought:** 1. Add the word "kitchen" in point ii )after "sanitary and".  
2. Delete iii) from the definition.  
3. Provide separate definitions for "worker accommodation" for seasonal workers and for permanent farm workers.

**Horticulture New Zealand - Participant #: 27 Submission #: 254**

Horticulture NZ recognises there are issues associated with provision of workers accommodation, especially seasonal workers. However, the measures which are introduced in variation 38 are draconian and unworkable as not all workers accommodation is of a temporary nature and can be accommodated in urban locations with workers travelling to the workplace. Linked with restriction on residential dwellings on Rural 3 and 4 means that provision of housing for farm and orchard staff will be very difficult.

A more flexible regime is needed to provide accommodation.

There are two requirements for workers accommodation: seasonable workers temporary accommodation and; housing for permanent workers.

While some seasonable workers accommodation may be provided in urban locations, there are situations where is appropriate that the accommodation is on site or in the rural area.

The variation suggests that workers accommodation is located in townships and that travel times are short. This is not necessarily the situation and does not reflect the diversity of need.

**Relief Sought:** Amend the definition of workers accommodation by deleting from iii) "on which the workers accommodation is located", and to include reference to cooking facilities in (ii).

**New Zealand Winegrowers - Participant #: 39 Submission #: 427**

This should include the provision of worker accommodation within an existing building or similar structure.

**Relief Sought:** In the definition of worker accommodation, insert the words "existing residential building or" before the words "a collection of buildings."

**O'Malley, Kaye - Participant #: 62 Submission #: 532**

The definition needs to begin "means a building, or collection..." to make sure it covers operations that involve just one building.

**Relief Sought:** Amend the definition for worker accommodation to begin: "means a building or a collection of buildings..."

**V2-G-Gen - General Rules- General Comments**

**Transit New Zealand - Participant #: 24 Submission #: 221**

Transit seeks amendments to the sight distance requirements of rule 2.4.7, and the substitute the sight distance standards of Appendix 4 of Transit's Planning Policy Manual instead of rule 2.4.7.

**Relief Sought:** 1. Amend the sight distance requirements of rule 2.4.7 to provide for only one category of activity i.e. remove from the table in rule 2.4.7 the separate minimum sight distances from access standards for residential activity.

2. Substitute the sight distance standards in Appendix 4 of Transit's Planning Policy Manual for

the current standards in rule 2.4.7.

### **V2-G-2.4.4 - General, 2.4.4**

#### **Marlborough Roads - Participant #: 88 Submission #: 1266**

Marlborough Roads consider that few crashes occur on local or collector roads where access spacing is a factor. 100m is reasonable. Whilst unclear, adjoining accesses should be on the same side of the road.

**Relief Sought:** Amend new rule 2.4.4.2 to clarify that adjoining accesses should be on the same side of the

#### **N Z Institute of Surveyors - Participant #: 3 Submission #: 86**

This is better located in the Code of Practice or covered under the Transit Act.

**Relief Sought:** Remove item 3, being 2.4.4 completely including the addition.

#### **NZ Automobile Association Incorporated - Participant #: 240 Submission #:**

Support in principle. We would prefer that all rural arterials be included in this rule i.e. the rural zoned land where the road has a speed limit of 80Kph or greater. The rule is based on reaction times, motorist expectations and an arterial environment and severity of the consequences of

**Relief Sought:** Include all rural arterials in this rule i.e. the rural zoned land where the road has a speed limit of 80Kph or greater.

#### **O'Malley, Kaye - Participant #: 62 Submission #: 534**

Not all state highways are limited access roads. It is important this rule also covers national routes to include those circumstances and to provide the capacity for uniform controls

**Relief Sought:** Amend rule 2.4.4.1 to read: "For sites with frontage to a national or arterial road, where the speed limit...".

#### **Traffic Design Group (Dave Petrie) - Participant #: 76 Submission #: 1078**

We oppose the methods by which minimum separation distances between vehicle crossings are determined. In many cases the separation distances are unreasonably onerous. An appropriate method for minimum separation distances should take into account actual speeds rather than the speed limit, the traffic volumes and/or the type of road and possible traffic volumes on the driveway. The very wide separation of 200m sought for a state highway is unrealistically onerous.

**Relief Sought:** Replace the wording of rule 2.4.4 with a series of tables which more appropriately reflect different operating speed and traffic flow environments (example attached to submission).

#### **Transit New Zealand - Participant #: 24 Submission #: 220**

Transit supports amended rule 2.4.4.1 but requests an additional provision.

**Relief Sought:** Add the following: "There shall be no more than 5 successive accesses along any kilometre of State Highway (on both sides) measured 500m either side of a proposed access.

### **V2-R-Gen - Rural-General Comments**

#### **Bruckel, Paul - Participant #: 57 Submission #: 6978**

Amendment to the rules could go a long way to reducing or removing tensions between neighbours. In particular the noise rules in rural areas leave a lot to be desired. Rural zone rule 1.4.1 - exception at the end introduces a problem,. As no definitions are provided for "normal agricultural and forestry practices" and no noise or time-of-day limits are prescribed for these activities. In addition, viticulture is increasingly being described as farming or agriculture.

There appears to be no assessment or control of cumulative noise e.g. wind machines used for frost control. Rule 1.4.2.3 provides an arbitrary distance of 300m. The effect is that a person in a dwelling 100m from a frost wind machine will be subjected to approximately 25 times the intensity of a person living on the periphery of a residential zone 500m area. Rule 1.4.2.3 has been used as

the basis for installing frost machines where inappropriate siting, lack of consent requirements and consultation with neighbours has cause friction and dissent.

**Relief Sought:** Wind machines and other noise source controls and rules require re-examination to ensure that public health is ensured through limiting noise levels for both workers and residents.

**Dodson, R C & J W - Participant #: 31 Submission #: 337**

Rural 4 seems to have been conveniently "added" to Rural 3 in this review. There are many differences, in soils, land use, water and drainage.

**Relief Sought:** None specified

**Sherwood, Nancy - Participant #: 61 Submission #: 6987**

Should "super stores" be allowed in rural areas - or at all?

**Relief Sought:** None specified

## V2-R-1.1 - Rural Zone , 1.1

**E D Townley Limited - Participant #: 85 Submission #: 1184**

Worker accommodation should also be a permitted activity in Rural 3 and 4 zones.

**Relief Sought:** 1. Add worker accommodation as a permitted activity in the Rural 3 and 4 zones;

**Horticulture New Zealand - Participant #: 27 Submission #: 255**

Horticulture NZ recognises there are issues associated with provision of workers accommodation, especially seasonal workers. However, the measures which are introduced in variation 38 are draconian and unworkable as not all workers accommodation is of a temporary nature and can be accommodated in urban locations with workers travelling to the workplace. Linked with restriction on residential dwellings on Rural 3 and 4 means that provision of housing for farm and orchard staff will be very difficult.

A more flexible regime is needed to provide accommodation.

There are two requirements for workers accommodation: seasonable workers temporary accommodation and; housing for permanent workers.

While some seasonable workers accommodation may be provided in urban locations, there are situations where is appropriate that the accommodation is on site or in the rural area.

The variation suggests that workers accommodation is located in townships and that travel times are short. This is not necessarily the situation and does not reflect the diversity of need.

**Relief Sought:** Add the following new bullet point as a permitted activity in the Rural 3 and 4 zones: "workers accommodation in Rural 3 and 4 zones"

**Horticulture New Zealand - Participant #: 27 Submission #: 258**

Horticulture NZ recognises there are issues associated with provision of workers accommodation, especially seasonal workers. However, the measures which are introduced in variation 38 are draconian and unworkable as not all workers accommodation is of a temporary nature and can be accommodated in urban locations with workers travelling to the workplace. Linked with restriction on residential dwellings on Rural 3 and 4 means that provision of housing for farm and orchard staff will be very difficult.

A more flexible regime is needed to provide accommodation.

There are two requirements for workers accommodation: seasonable workers temporary accommodation and; housing for permanent workers.

While some reasonable workers accommodation may be provided in urban locations, there are situations where it is appropriate that the accommodation is on site or in the rural area.

The variation suggests that workers accommodation is located in townships and that travel times are short. This is not necessarily the situation and does not reflect the diversity of need.

**Relief Sought:** Make consequential amendments to change the status of workers accommodation (to

**Marris, John & Alison - Participant #: 234 Submission #: 5518**

Support the amendments to rule 1.1. This rule will facilitate the development of less versatile soils within the Rural 4 Zone.

**Relief Sought:** Accept the proposed amendments.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 93**

There does not seem to be any logic to the removal of veterinary clinics and professional offices as permitted activities in the Rural zone.

**Relief Sought:** Amend to read: "Home occupations, professional offices and veterinary clinics..."

**New Zealand Winegrowers - Participant #: 39 Submission #: 431**

It is inappropriate for the plan to limit residential density in all rural zones to one dwelling unit per title for the reasons outlined in objective 2, policy 2.5. In addition, homestay facilities should be limited to those homestay facilities ancillary to rural activities.

**Relief Sought:** 1. Amend the bullet point permitted erecting of one dwelling per title and replace "title" with "property".  
2. Amend the bullet point relating to homestay to read: "Homestay associated with rural

**Otuwhero Estate Limited - Participant #: 7 Submission #: 158**

Worker accommodation should also be a permitted activity in Rural 3 and 4 zones.

**Relief Sought:** 1. Add worker accommodation as a permitted activity in the Rural 3 and 4 zones.

**Saxton, Frank - Participant #: 20 Submission #: 183**

It is vital that people be permitted to building on land they own. This is particularly so as land owners are demanded rates that include an area general charge. If there is no building on a particular separate freehold rural title then the area general charge portion of the rates are a levy on something that does not exist i.e. residents. Then if somebody wants to build on their vacant land and they are told they are not allowed then it is a double injustice.

Subdivision into freehold title should not be allowed in rural land that also do not permit the building of a dwelling house.

**Relief Sought:** Subdivision into freehold title should not be allowed in rural land that also do not permit the building of a dwelling house.

**Weyerhaeuser New Zealand Limited - Participant #: 84 Submission**

WNZL oppose the deletion for homestays to be limited to not more than 5 visitors. Permitting this without restriction exposes legitimate rural activities to the risks of increased occupation.

**Relief Sought:** Retain the limitation on 5 visitor for homestay in bullet 3.



**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6566**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6588**

**Hadley, J A & J P - Participant #: 63 Submission #: 590**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6782**

**Tu Jaes Trust - Participant #: 64 Submission #: 6458**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6702**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6814**

**Wharehunga Trust - Participant #: 70 Submission #: 6889**

No reasons are given to justify the removal of professional offices and veterinary clinics from Rural 3 & 4 zones. The home occupation definition change creates a new level of professional offices.

Also "professional offices" not defined, which might result in confusion with this activity being captured under commercial activity status.

**Relief Sought:** Delete this change

## **V2-R-1.3.5.2 - Rural Zone, 1.3.5.2**

**Horticulture New Zealand - Participant #: 27 Submission #: 285**

Horticulture NZ does not support the approach to greenhouses, in particular the restrictions related to site coverage. The provisions seek to apply a percentage restriction of site coverage, except where greenhouses are utilising soil. Such a restriction makes a distinction between crops grown indoor in media and those grown in soil. Growing in media does not remove the soil or limit the life supporting capacity. When the greenhouse is removed the soil is still available for other

**Relief Sought:** Amend rule 1.3.5.2 to read as follows: "For all other activities, the site may be covered by permanent buildings, except greenhouses which are exempt from the site limitation."

**N Z Institute of Surveyors - Participant #: 3 Submission #: 94**

Table needs clarifying.

**Relief Sought:** Amend table in rule 1.3.5.2 as follows:

< 2ha 15%  
2-5ha 10%  
> 5ha 5%

## **V2-R-1.3.8 - Rural Zone, new rule 1.3.8**

**E D Townley Limited - Participant #: 85 Submission #: 1185**

1.3.8.1 states "a dwelling house shall not be erected on a lease title unless the lease title is created by subdivision". How else would a lease title be created but by subdivision? And how does that relate to existing lease titles? What is a lease title if the land is not being subdivided?

**Relief Sought:** Delete proposed new rule 1.3.8.1

**Otuwhero Estate Limited - Participant #: 7 Submission #: 159**

1.3.8.1 states "a dwelling house shall not be erected on a lease title unless the lease title is created by subdivision". How else would a lease title be created but by subdivision? And how does that relate to existing lease titles? What is a lease title if the land is not being subdivided?

**Relief Sought:** Delete proposed new rule 1.3.8.1

## **V2-R-2.1 - Rural Zone, 2.1, new bullet point**

**Horticulture New Zealand - Participant #: 27 Submission #: 265**

Horticulture NZ does not support the approach to residential dwellings in the rural zones and the requirement for either a discretionary or non-complying consent of more than one dwelling on a title. Such provisions do not provide an adequate framework for provision of dwellings for rural workers. Owners within only one title are disadvantaged.

It has generally been recognised that there may be more than one dwelling on rural properties to service the needs to the property and this should be allowed to continue.

The requirements for dwelling house for dependent relatives are draconian and unworkable.

The approach seems based on "lifestyle" development being "residential" but this overlooks the fact there is a need for residences for rural workers. If the focus is on lifestyle type residences that should be stated. Residences that service the rural sector are not usually considered incompatible with the rural environment. There is no distinction between lifestyle type activity and that necessary for the rural productive sector.

**Relief Sought:** Amend new bullet point to read: "The erection of two or more dwelling houses".

**Landco Limited - Participant #: 22 Submission #: 185**

Worker accommodation in the Rural 4 zone is a matter for council's control, not discretion. We believe that applicants should have the confidence that council will approve applications for worker accommodation in the Rural 4 zone, and council will restrict its assessment to those matters that are directly related to the effects of establishing worker accommodation. Potential impacts of worker accommodation are easily identified. It is considered that the site specific circumstances that council wishes to assess through the resource consent process are able to be sufficiently considered under matters of control.

**Relief Sought:** Include worker accommodation in the Rural 4 zone as a controlled activity.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 95**

The idea of dependant relatives is far too broad, impossible to police and is not required. To avoid the whole concept of dependant relative a new definition should be introduced for an ancillary unit.

An ancillary unit would be defined as: "A self contained unit, ancillary to a dwelling house, and of a size no larger than 200sq. metres GFA, held on the same Certificate of Title as a dwelling house and which may be located within the structure of a dwelling. Only one ancillary unit should be permitted per Certificate of Title. Should subdivision result in separate titles, then the permitted

**Relief Sought:** Amend the bullet point to read "The erection of buildings with one dwelling house and ancillary unit per title."

**New Zealand Winegrowers - Participant #: 39 Submission #: 432**

It is inappropriate for the plan to provide for erection of a dwelling house for a dependent relative of the landowner as a controlled activity. Such a restriction is not effects based and is contrary to the purpose and principles of the RMA. Establishing whether an additional dwelling constructed in the Rural 3 and 4 zones is being used for a "dependent relative" will be a subjective test and difficult to enforce.

**Relief Sought:** Delete the new bullet point at the end of rule 2.1

**New Zealand Winegrowers - Participant #: 39 Submission #: 434**

Worker accommodation in the Rural 4 zone should be a controlled activity. This is particularly the case as parts of the Rural 4 zone, such as the Awarere Valley, are located remotely from town centres and daily transport is not practicable, particularly during vintage. In such cases it is appropriate for worker accommodation to be a controlled activity where it is able to be located within an existing structure/facility and does not adversely affect the productive uses of versatile

**Relief Sought:** Add a new bullet point to read: "worker accommodation in the Rural 4 zone where the place of work is remote from a town centre, and such accommodation is available on-site in an existing structure or facility."

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6562**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6608**

**Hadley, J A & J P - Participant #: 63 Submission #: 591**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6781**

**Tu Jaes Trust - Participant #: 64 Submission #: 6503**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6710**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6810**

**Wharehunga Trust - Participant #: 70 Submission #: 6869**

Term "dependent relative" is very restrictive and does not reflect family working relationships in the rural community.

**Relief Sought:** Delete the word "dependent".

## **V2-R-2.9 - Rural Zone, new rule 2.9**

**Bowen, D A W - Participant #: 222 Submission #: 5416**

Too restrictive and the area too small.

**Relief Sought:** 1. Extend the maximum area to 200m<sup>2</sup> exclusive of garages.

2. Delete reference to single car garaging.

3. Delete the need to remove dwelling.

4. Add in reference that the dwelling is ancillary to the main residential unit and cannot be used to justify a later subdivision.

**Clintondale Trust - Participant #: 23 Submission #: 207**

The district's economic and social status is a direct consequence of primary production, winegrowing in particular. The extent of viable land and the economics of its development are self-limiting and the boundaries of expansion will be reached. Those involved in primary economic environment need to have confidence that the resource management policies offer protection from further encroachment on productive land through subdivision, or increased Rural Residential density. Whilst there is general acceptance for rural practices to limit impact, there is an expectation for rural residents to equally mitigate the impact of rural activities. Requirements could include prescribing setback from the rural boundary. Such subdivision conditions could be augmented by mitigation measures through the building permit process i.e. double glazing, sound insulation etc.

The traditional subdivision threshold of 8ha should be maintained, subject to the caveat of one title, one residence. Existing Rural Residential zones within the Rural 3 & 4 zones need to be restricted to the current extent. Future Rural Residential expansion that does not abut the existing urban area should be limited to non-primary production land.

Development has placed pressure on all roads, particularly the arterial road network. A policy needs to be adopted to pre-empt inappropriate subdivision and development in the rural and coastal environment.

**Relief Sought:** Expand to "Erection of dwelling house for dependent relatives of the landowner" to make specific reference to the definition for "dependent relative".

**E D Townley Limited - Participant #: 85 Submission #: 1186**

What is a "dependent relative"? Does that extend to a son or daughter working on a parent or other relative's farm? They may not be dependent on the landowners, but the farm or the landowner may be dependent on them.

**Relief Sought:** Add "workers" or "family members working on the particular farm" as controlled activities.

**E D Townley Limited - Participant #: 85 Submission #: 1188**

There should be no reason for a dwelling house to be removed "on transfer of title", not a limitation

to "dependent relatives".

**Relief Sought:** Delete the fourth bullet point.

**E D Townley Limited - Participant #: 85 Submission #: 1187**

There is no reason to impose a limit of 80m<sup>2</sup>. If the building is able to be "readily removed" why should there be a size limitation at all? This is particularly important with young people working on farms owned by their parents or wider family where 80m<sup>2</sup> will simply not be enough to cater for their families.

**Relief Sought:** Delete the area limitation.

**Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 250**

Federated Farmers is strongly opposed to such controls placed on the erection of dwelling houses. These rules are completely onerous, with no provision for dwelling houses for permanent farm employees. There shouldn't be a distinction between dependent relatives and employees.

**Relief Sought:** Delete new rule

**H & J Meyers Partnership - Participant #: 2 Submission #: 12**

Remove the following section " - The dwelling house is a single storey with a maximum floor area of 80 square metres, exclusive of garaging." as the building has to be removed on transfer and a bond would have been imposed.

**Relief Sought:** Remove 2.9.1 " - The dwelling house is a single storey with a maximum floor area of 80 square metres, exclusive of garaging."

**Horticulture New Zealand - Participant #: 27 Submission #: 266**

Horticulture NZ does not support the approach to residential dwellings in the rural zones and the requirement for either a discretionary or non-complying consent of more than one dwelling on a title. Such provisions do not provide an adequate framework for provision of dwellings for rural workers. Owners within only one title are disadvantaged.

It has generally been recognised that there may be more than one dwelling on rural properties to service the needs to the property and this should be allowed to continue.

The requirements for dwelling house for dependent relatives are draconian and unworkable.

The approach seems based on "lifestyle" development being "residential" but this overlooks the fact there is a need for residences for rural workers. If the focus is on lifestyle type residences that should be stated. Residences that service the rural sector are not usually considered incompatible with the rural environment. There is no distinction between lifestyle type activity and that necessary for the rural productive sector.

**Relief Sought:** Delete new rule

**Landco Limited - Participant #: 22 Submission #: 5666**

Worker accommodation in the Rural 4 zone is a matter for council's control, not discretion. We believe that applicants should have the confidence that council will approve applications for worker accommodation in the Rural 4 zone, and council will restrict its assessment to those matters that are directly related to the effects of establishing worker accommodation. Potential impacts of worker accommodation are easily identified. It is considered that the site specific circumstances that council wishes to assess through the resource consent process are able to be sufficiently considered under matters of control.

**Relief Sought:** Insert the following "2.9 Matters over which control may be exercised - worker accommodation in the Rural 4 zone:

- the bulk and location of any buildings and structure including fences;
- the protection of public and private amenity values;
- the design and appearance of any buildings and landscaping features;
- the protection of the roading network and any traffic impacts;

- the potential impacts from waste water discharge and disposal.

**Monk, Craig & Jo - Participant #: 72 Submission #: 1012**

This is inappropriate and would be a breach of our rights as landowners.

*Relief Sought:* Delete new rule 2.9.1

**N Z Institute of Surveyors - Participant #: 3 Submission #: 96**

Not appropriate to place so many restrictions, especially as it relates to a "dependant" relative which is far too in definitive, and the size of the dwelling etc.

Remove the new rule, as the proposed change to Rural rule 2.1 will cover the activity.

*Relief Sought:* Remove the new rule.

**New Zealand Winegrowers - Participant #: 39 Submission #: 433**

It is inappropriate for the plan to provide for erection of a dwelling house for a dependent relative of the landowner as a controlled activity. Such a restriction is not effects based and is contrary to the purpose and principles of the RMA. Establishing whether an additional dwelling constructed in the Rural 3 and 4 zones is being used for a "dependent relative" will be a subjective test and difficult to enforce.

*Relief Sought:* Delete new rule 2.9.

**Newport, Trevor & Yvonne - Participant #: 228 Submission #: 5428**

Oppose. The maximum floor area of 80m2 is too small and should be increased.

*Relief Sought:* Increase minimum area in 2.9.1 to at least 90m2.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 160**

What is a "dependent relative"? Does that extend to a son or daughter working on a parent or other relative's farm? They may not be dependent on the landowners, but the farm or the landowner may be dependent on them.

*Relief Sought:* Add "workers" or "family members working on the particular farm" as controlled activities.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 162**

There should be no reason for a dwelling house to be removed "on transfer of title", not a limitation to "dependent relatives".

*Relief Sought:* Delete the fourth bullet point.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 161**

There is no reason to impose a limit of 80m2. If the building is able to be "readily removed" why should there be a size limitation at all? This is particularly important with young people working on farms owned by their parents or wider family where 80m2 will simply not be enough to cater for their families.

*Relief Sought:* Delete the area limitation.

**Stanton, Brian & Newport Sharon - Participant #: 227 Submission #: 5427**

Oppose. The maximum floor area of 80m2 is too small and should be increased.

*Relief Sought:* Increase the minimum floor area in 2.9.1, second bullet point.

**Williams, Peter & Dianne - Participant #: 71 Submission #: 1008**

This is inappropriate and would be a breach of our rights as landowners.

*Relief Sought:* Delete new rule 2.9.1

**Gane, Graeme & Raewyn - Participant #: 36 Submission #: 6965**  
**Gane, Laurin - Participant #: 37 Submission #: 6970**  
**Gane, Nev & Jenni - Participant #: 34 Submission #: 6955**  
**Large, Marie - Participant #: 38 Submission #: 6975**  
**Large, Matthew - Participant #: 32 Submission #: 6945**  
**Marfell, Bridget - Participant #: 33 Submission #: 6950**  
**Marfell, T S & J M - Participant #: 42 Submission #: 448**  
**Markview Vineyard - Participant #: 29 Submission #: 322**  
**Morris, Melanie - Participant #: 30 Submission #: 6940**  
**Wratt, Quentin - Participant #: 35 Submission #: 6960**

The addition of new rule 2.9 is opposed. There is no justification for such a prescriptive rule. The inclusion of this rule is not consistent with the objectives and policies identified in the review pursuant to section 32 of the RMA.

There is no definition for "dependent relative". There is no provision as to who will determine this and on what criteria. Why should a dependent relative be allowed to reside in their own separate residential accommodation when another relative deemed not dependent is not afforded the same right?

There has been no discussion that the 80m<sup>2</sup> criteria (2.9.1) is considered acceptable or fair and reasonable. No provision is made if the dependent relative has their own dependent relatives. The only garaging permitted is a single car garage or carport for one car. This does not take into account any storage of possessions and habitation of families. The concept is rejected and the family flat should be retained.

On productive land two generations of family involved and supported can co-exist on the property. It is not acceptable that one generation will be required to relocate to town.

There are many examples of satisfactory secondary housing.

What about where the land owner can live longer on their property without support of a family member close by? This is a common consideration and precluded by the rule.

The Council needs to address the issue [of subdivision] directly rather than trying to strengthen the subdivision by hampering any opportunities for building secondary residences.

The concept of preventing any second dwelling on a Certificate of Title is naive of cultural and heritage considerations. It has long been the practice of rural farming types to transfer their property by succession to following generations. This often requires both generations to co-exist on the same property at the same time.

It is completely rejected that there is unequivocal support for the abolition of the present policy of the family flat and the establishment of new rule 2.9.

***Relief Sought:*** Delete the new provision, retain the family flat provisions.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6558**  
**Hadley Reese Partnership - Participant #: 66 Submission #: 6597**  
**Hadley, J A & J P - Participant #: 63 Submission #: 592**  
**J A Hadley Family Trust - Participant #: 68 Submission #: 6761**  
**Tu Jaes Trust - Participant #: 64 Submission #: 6510**  
**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6694**  
**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6807**  
**Wharehunga Trust - Participant #: 70 Submission #: 6884**

Term "dependent relative" is very restrictive and does not reflect family working relationships in the rural community.



- Relief Sought:** 1.Remove the word dependant.  
2. In bullet point 1, replace the word "removed" with "relocated".  
3. Delete bullet points 2, 3 and 4 from 2.9.1.

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief)**

This provision is draconian. Either the house should be built or not. It does not matter who occupies it.

**Relief Sought:** Delete this provision.

## V2-R-4.1 - Rural, 4.1, bullet points

**E D Townley Limited - Participant #: 85 Submission #: 1189**

The proposed new provision refers only to the Rural 4 zone and should include the Rural 3 zone also. The replacement bullet points are applicable to only the Rural 4 zone.

**Relief Sought:** Include reference to the Rural 3 zone also.

**Horticulture New Zealand - Participant #: 27 Submission #: 269**

Horticulture NZ does not support the approach to residential dwellings in the rural zones and the requirement for either a discretionary or non-complying consent of more than one dwelling on a title. Such provisions do not provide an adequate framework for provision of dwellings for rural workers. Owners within only one title are disadvantaged.

It has generally been recognised that there may be more than one dwelling on rural properties to service the needs to the property and this should be allowed to continue.

The requirements for dwelling house for dependent relatives are draconian and unworkable.

The approach seems based on "lifestyle" development being "residential" but this overlooks the fact there is a need for residences for rural workers. If the focus is on lifestyle type residences that should be stated. Residences that service the rural sector are not usually considered incompatible with the rural environment. There is no distinction between lifestyle type activity and that necessary for the rural productive sector.

**Relief Sought:** Retain bullet 1 "dwelling houses not provided..."

**Horticulture New Zealand - Participant #: 27 Submission #: 256**

Horticulture NZ recognises there are issues associated with provision of workers accommodation, especially seasonal workers. However, the measures which are introduced in variation 38 are draconian and unworkable as not all workers accommodation is of a temporary nature and can be accommodated in urban locations with workers travelling to the workplace. Linked with restriction on residential dwellings on Rural 3 and 4 means that provision of housing for farm and orchard staff will be very difficult.

A more flexible regime is needed to provide accommodation.

There are two requirements for workers accommodation: seasonable workers temporary accommodation and; housing for permanent workers.

While some seasonable workers accommodation may be provided in urban locations, there are situations where is appropriate that the accommodation is on site or in the rural area.

The variation suggests that workers accommodation have been located in townships an that travel times are short. This is not necessarily the situation and does not reflect the diversity of need.

**Relief Sought:** Delete bullet point 2 "workers accommodation in Rural 4."

**Horticulture New Zealand - Participant #: 27 Submission #: 267**

Horticulture NZ does not support the approach to residential dwellings in the rural zones and the requirement for either a discretionary or non-complying consent of more than one dwelling on a title. Such provisions do not provide an adequate framework for provision of dwellings for rural workers. Owners within only one title are disadvantaged.

It has generally been recognised that there may be more than one dwelling on rural properties to service the needs to the property and this should be allowed to continue.

The requirements for dwelling house for dependent relatives are draconian and unworkable.

The approach seems based on "lifestyle" development being "residential" but this overlooks the fact there is a need for residences for rural workers. If the focus is on lifestyle type residences that should be stated. Residences that service the rural sector are not usually considered incompatible with the rural environment. There is no distinction between lifestyle type activity and that necessary for the rural productive sector.

**Relief Sought:** Delete bullet 1 "two or more dwelling houses..."

**N Z Institute of Surveyors - Participant #: 3 Submission #: 98**

Worker accommodation and veterinary clinics should be permitted in the Rural 4 Zone. There is no problem at the moment so why alter it.

**Relief Sought:** Remove reference to worker accommodation and veterinary clinics.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 97**

**Relief Sought:** Leave the two bullet points in.

**New Zealand Winegrowers - Participant #: 39 Submission #: 435**

The provisions fail to properly provide for rural activities in the rural zone. In addition, two or more dwelling houses in the Rural 4 zone on any title should be a non-complying activity.

Visitor accommodation should be provided for in the rural zone as appropriate taking into account use of existing structures and ensure that the productive uses of versatile soils are maintained.

**Relief Sought:** 1. Add the following as discretionary activities:

"- activities ancillary to rural activities in the rural zones, including homestay  
- visitor accommodation where occupied within existing structures, and/or without adversely affecting the productive uses of versatile soils."

2. Amend the following to a non-complying activity:

"- two or more dwellings on any property in the Rural 4 zone.  
- other activities not ancillary to rural activities in the rural zone."  
-Visitor accommodation.

**O'Malley, Kaye - Participant #: 62 Submission #: 537**

Veterinary clinics are already covered under the definition of "Community Facilities".

**Relief Sought:** Delete "veterinary clinics" from proposed rule 4.1.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 163**

The proposed new provision refers only to the Rural 4 zone and should include the Rural 3 zone also. The replacement bullet points are applicable to only the Rural 4 zone.

**Relief Sought:** Include reference to the Rural 3 zone also.

**PYG Limited - Participant #: 238 Submission #: 5565**

There is going to be an increased need for worker accommodation particularly from vineyards. The definition of "workers accommodation" requires that residential activity is used by persons

employed on the property on which to workers accommodation is located.

**Relief Sought:** Allow workers accommodation as a permitted activity.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6574**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6598**

**Hadley, J A & J P - Participant #: 63 Submission #: 594**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6771**

**Tu Jaes Trust - Participant #: 64 Submission #: 6489**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6717**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6797**

**Wharehunga Trust - Participant #: 70 Submission #: 6893**

Does not reflect community needs of Rural 4. Workers accommodation should be either a permitted or controlled activity. Veterinary clinics should be permitted.

**Relief Sought:** 1.Delete "Workers accommodation in Rural 4 zone on any title"  
2. Delete "Veterinary clinics".

## V2-R-5.1 - Rural, 5.1

**Bowen, D A W - Participant #: 222 Submission #: 5417**

Amend wording to fit in with other changes recommended by submitter.

**Relief Sought:** Replace first bullet point with the following: "The erection of a dwelling house in the Rural 3 zone not provided for as a permitted, controlled or discretionary activity."

**E D Townley Limited - Participant #: 85 Submission #: 1190**

The effect of the provision is to elevate any dwelling house not provided for as a permitted activity, two or more dwelling houses in the Rural 3 zone, and worker accommodation in the Rural 3 zone, to non-complying. That is inappropriate, the matter should be able to be dealt with as discretionary activities at worst, or as controlled activities for additional dwelling houses required for farm workers or worker accommodation. Removal of worker accommodation from permitted/controlled status is to impose an unnecessary constraint on development of the Rural 3 Zone.

**Relief Sought:** Delete proposed rule 5.1 and make the same provisions discretionary activities under new rule 4.1.

**Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 251**

Federated Farmers strongly opposes bullet points 1, 2 & 3. These additional bullet points set a nearly impossible threshold for people wanting to build more than one dwelling house in the Rural 3 zone.

**Relief Sought:** Move these bullet points to controlled activity status.

**Horticulture New Zealand - Participant #: 27 Submission #: 257**

Horticulture NZ recognises there are issues associated with provision of workers accommodation, especially seasonal workers. However, the measures which are introduced in variation 38 are draconian and unworkable as not all workers accommodation is of a temporary nature and can be accommodated in urban locations with workers travelling to the workplace. Linked with restriction on residential dwellings on Rural 3 and 4 means that provision of housing for farm and orchard staff will be very difficult.

A more flexible regime is needed to provide accommodation.

There are two requirements for workers accommodation: seasonable workers temporary accommodation and; housing for permanent workers.

While some seasonable workers accommodation may be provided in urban locations, there are situations where is appropriate that the accommodation is on site or in the rural area.

The variation suggests that workers accommodation is located in townships and that travel times are short. This is not necessarily the situation and does not reflect the diversity of need.

**Relief Sought:** Delete bullet 3 from non-complying activities "workers accommodation in Rural 3"

**Horticulture New Zealand - Participant #: 27 Submission #: 268**

Horticulture NZ does not support the approach to residential dwellings in the rural zones and the requirement for either a discretionary or non-complying consent of more than one dwelling on a title. Such provisions do not provide an adequate framework for provision of dwellings for rural workers. Owners within only one title are disadvantaged.

It has generally been recognised that there may be more than one dwelling on rural properties to service the needs to the property and this should be allowed to continue.

The requirements for dwelling house for dependent relatives are draconian and unworkable.

The approach seems based on "lifestyle" development being "residential" but this overlooks the fact there is a need for residences for rural workers. If the focus is on lifestyle type residences that should be stated. Residences that service the rural sector are not usually considered incompatible with the rural environment. There is no distinction between lifestyle type activity and that necessary for the rural productive sector.

**Relief Sought:** Delete bullets 1 and 2 ("The erection of a dwelling" and "two or more dwelling houses...").

**Marris, John & Alison - Participant #: 234 Submission #: 5519**

Support the amendment to rule 5.

**Relief Sought:** Accept the proposed amendments.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 99**

With rising fuel costs, high accommodation in Blenheim, distance of the vineyards to town and the shortage of workers, worker accommodation should be the responsibility in part of the employer. It makes more sense to provide worker accommodation in rural areas as discretionary, not non-complying. The rule will have far reaching consequences for the labour force.

If the definition for a dwelling and ancillary unit were to be adopted, the second bullet point would also need changing.

**Relief Sought:** 1. Remove reference to workers accommodation.

2. Alter bullet point 2 to read: "Two or more ancillary units in the Rural 3 Zone on any title."

**New Zealand Winegrowers - Participant #: 39 Submission #: 436**

It is appropriate that two or more dwelling houses in the Rural 3 zone on any one property be a non-complying activity, rather than title (or reasons outlined in the submissions on chapter 12, objective 2, policy 2.5).

**Relief Sought:** 1. Retain existing activity status of amendments but replace reference in second bullet point to "title" with "property".

2. Amend the following to a non-complying activity: "- two or more dwellings on any property in the Rural 4 zone

- other activities not ancillary to rural activities in the rural zone."

**O'Malley, Kaye - Participant #: 62 Submission #: 538**

The first two bullet points cover the same thing.

**Relief Sought:** Retain the first bullet point (consistent with the plan's approach) and delete the second one.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 164**

The effect of the provision is to elevate any dwelling house not provided for as a permitted activity, two or more dwelling houses in the Rural 3 zone, and worker accommodation in the Rural 3 zone,

to non-complying. That is inappropriate, the matter should be able to be dealt with as discretionary activities at worst, or as controlled activities for additional dwelling houses required for farm workers or worker accommodation. Removal of worker accommodation from permitted/controlled status is to impose an unnecessary constraint on development of the Rural 3 Zone.

**Relief Sought:** Delete proposed rule 5.1 and make the same provisions discretionary activities under new rule 4.1.

**PYG Limited - Participant #: 238 Submission #: 5564**

There is going to be an increased need for worker accommodation particularly from vineyards. The definition of "workers accommodation" requires that residential activity is used by persons employed on the property on which to workers accommodation is located.

**Relief Sought:** Allow workers accommodation as a permitted activity in Rural 3 and Rural 4.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6553**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6604**

**Hadley, J A & J P - Participant #: 63 Submission #: 593**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6767**

**Tu Jaes Trust - Participant #: 64 Submission #: 6485**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6690**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6821**

**Wharehunga Trust - Participant #: 70 Submission #: 6888**

Wording makes dwellings for relatives in Rural 3 non-complying. This is inconsistent with the controlled activity rule.

Workers accommodation is more appropriately addressed as a discretionary activity.

**Relief Sought:** 1. Delete "Workers accommodation in Rural 3 zone".  
2. Amend rule to allow for dwellings for relatives in Rural 3 zone.

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

Worker accommodation in the Rural 3 and 4 zones should be a permitted or controlled activity.

**Relief Sought:** None specified

## V2-RR-1.1 - Rural Residential, 1.1

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6581**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6611**

**Hadley, J A & J P - Participant #: 63 Submission #: 595**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6775**

**Tu Jaes Trust - Participant #: 64 Submission #: 6494**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6723**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6800**

**Wharehunga Trust - Participant #: 70 Submission #: 6878**

Addition of homestay as a permitted activity is supported.

**Relief Sought:** None specified

## V2-S-Gen - Subdivision, General Comments

**Ben Morven Partnership - Participant #: 59 Submission #: 6981**

Agree with the plan retaining the 8ha minimum for Rural 3 zone for the following reasons.

- i) restricts dwellings on good productive land
- ii) less likely conflict between residential and rural activities
- iii) less residents means less traffic on the problem roads.

**Relief Sought:** Support

**N Z Institute of Surveyors - Participant #: 3 Submission #: 91**

What has happened to the existing 3.7.2 Boundary Adjustments if this is proposed as the same number?

*Relief Sought:* None to the addition on protection.

**V2-S-2.4.2 - Subdivision, 2.4.2****N Z Institute of Surveyors - Participant #: 3 Submission #: 87**

Why should there be a specific note for Old Renwick Road and no others?

*Relief Sought:* Leave Advisory note as is and remove last section added.

**NZ Automobile Association Incorporated - Participant #: 240 Submission #:**

Fully support. Old Renwick Rd has an increasingly significant role in the regional transportation network. The Association would also support the inclusion of Jacksons, New Renwick and Bells Roads for LAR status in the future.

*Relief Sought:* None specified.

**V2-S-2.5 - Subdivision, 2.5****Department of Conservation - Participant #: 229 Submission #: 5455**

First bullet point is supported.

*Relief Sought:* Retain the first additional bullet point.

**Haymes, Graeme - Participant #: 231 Submission #: 5470**

Landscaping is the act of carrying out work and is not the correct word. This gives council the ability to requires a landscape assessment on every urban subdivision. This is neither necessary or desirable.

*Relief Sought:* 1. Amend bullet point 1 to read: "landscape in urban/township and rural environments where a particular or significant feature warrants an assessment".

2. Remove second and third bullet points (protection of landscape features and amenity values)

**Haymes, Graeme - Participant #: 231 Submission #: 5468**

Landscaping is the act of carrying out work and is not the correct word. This gives council the ability to requires a landscape assessment on every urban subdivision. This is neither necessary or desirable.

*Relief Sought:* Delete second bullet point "landscaping in the urban environments/townscapes".

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6556****Hadley Reese Partnership - Participant #: 66 Submission #: 6627****Hadley, J A & J P - Participant #: 63 Submission #: 584****J A Hadley Family Trust - Participant #: 68 Submission #: 6754****Tu Jaes Trust - Participant #: 64 Submission #: 6478****Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6695****Wharehunga Forestry Limited - Participant #: 69 Submission #: 6809****Wharehunga Trust - Participant #: 70 Submission #: 6926**

Landscape guidelines have been promoted as a voluntary guide only and relevant to Rural 3. Inappropriate to include "landscaping" controls.

*Relief Sought:* Delete the second bullet point "landscaping in the urban environment/townships".



**V2-S-3.1 - Subdivision, 3.1****N Z Institute of Surveyors - Participant #: 3 Submission #: 88***Relief Sought:* Support**New Zealand Winegrowers - Participant #: 39 Submission #: 428**

NZ Winegrowers support the provision that all subdivision in the Rural 3 and 4 zones is currently a non-complying activity. Subdivision can have significant adverse effects on the productive and life supporting capacity of soils within the Rural 3 and 4 zones. In order to sustain the potential of the natural and physical resource and to maintain NZ's reputation for its wine, the most stringent tests available should be applied to any request to subdivide within the Rural 3 and 4 zones.

*Relief Sought:* Amend reference to subdivision within the Rural 3 and 4 zones from being a discretionary activity to being a non-complying activity.

**V2-S-3.5 - Subdivision, 3.5****E D Townley Limited - Participant #: 85 Submission #: 1181**

The deletion of "non-complying" means there are no criteria for non-complying activity applications. This is inappropriate.

*Relief Sought:* Retain this provision the way it was prior to Variation 38.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 155**

The deletion of "non-complying" means there are no criteria for non-complying activity applications. This is inappropriate.

*Relief Sought:* Retain this provision the way it was prior to Variation 38.

**V2-S-3.5.5.3 - Subdivision, 3.5.5.3, new bullet points****Department of Conservation - Participant #: 229 Submission #: 5456**

The amendments are supported. However it is unclear whether "significant environmental features" has the same meaning as "significant natural features" in chapter 23. To avoid confusion, the same term should be used.

*Relief Sought:* Amend rule 3.5.5.3 to read: "On any significant natural features, and in particular where the end result of the proposed subdivision..."

**Department of Conservation - Participant #: 229 Submission #: 5457**

Amendments are supported.

*Relief Sought:* Retain reference to freshwater in the second bullet point in 3.5.5.3.

**Department of Conservation - Participant #: 229 Submission #: 5458**

New bullet point is supported.

*Relief Sought:* Retain new bullet point.

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6550****Hadley Reese Partnership - Participant #: 66 Submission #: 6620****Hadley, J A & J P - Participant #: 63 Submission #: 585****J A Hadley Family Trust - Participant #: 68 Submission #: 6726****Tu Jaes Trust - Participant #: 64 Submission #: 6472****Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6701****Wharehunga Forestry Limited - Participant #: 69 Submission #: 6825****Wharehunga Trust - Participant #: 70 Submission #: 6931**

The amended bullet point is supported

The new bullet point is supported

*Relief Sought:* None specified

## V2-S-3.6 - Subdivision, Resource Consent Conditions

### **E D Townley Limited - Participant #: 85 Submission #: 1182**

The deletion of "non-complying" means there are no criteria for non-complying activity applications. This is inappropriate.

*Relief Sought:* Retain this provision the way it was prior to Variation 38.

### **Haymes, Graeme - Participant #: 231 Submission #: 5469**

Rule 2.5 contains matters for controlled activities, and rule 3.6 for discretionary and non-complying activities. Why change it?

*Relief Sought:* Retain it as it is.

### **Otuwhero Estate Limited - Participant #: 7 Submission #: 156**

The deletion of "non-complying" means there are no criteria for non-complying activity applications. This is inappropriate.

*Relief Sought:* Retain this provision the way it was prior to Variation 38.

## V2-S-3.6.1 - Subdivision, 3.6.1, new bullet points

### **Federated Farmers of New Zealand (Inc) - Participant #: 26 Submission #: 248**

Federated Farmers feels that for council to expect landscaping in a rural environment is unreasonable.

*Relief Sought:* Amend first bullet to read: "Landscaping in urban/township environments".

### **N Z Institute of Surveyors - Participant #: 3 Submission #: 89**

It is not appropriate that Council dictates the landscaping required. Theirs is an advisory role.

*Relief Sought:* Remove Landscaping in urban/township rural environments.

### **New Zealand Winegrowers - Participant #: 39 Submission #: 429**

It is appropriate for subdivision consents to recognise the adverse impact that subdivision within the Rural 3 and 4 zones can have.

Resource consent conditions should be a tool to protect the existing and future operation of rural activities within the rural zones. In particular, subdivision conditions should highlight issues of reverse sensitivity and preserve the productive capacity of soils within the Rural 3 and 4 zones.

*Relief Sought:* 1. Include additional conditions in 3.6 as follows:

- preserving productivity of versatile soils
- enabling and enhancing a productive working rural environment
- cross-boundary effects at the rural-residential interface"

2. Include any other matters to give effect to the concerns of NZ Winegrowers.

### **Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6565**

### **Hadley Reese Partnership - Participant #: 66 Submission #: 6647**

### **Hadley, J A & J P - Participant #: 63 Submission #: 587**

### **J A Hadley Family Trust - Participant #: 68 Submission #: 6730**

### **Tu Jaes Trust - Participant #: 64 Submission #: 6444**

### **Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6705**

### **Wharehunga Forestry Limited - Participant #: 69 Submission #: 6799**

### **Wharehunga Trust - Participant #: 70 Submission #: 6927**

Landscape guidelines have been promoted as a voluntary guide only and relevant to Rural 3. Inappropriate to include "landscaping" controls.

*Relief Sought:* Delete the bullet point "Landscaping in the urban environments/ townships and rural

environments".

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**  
"Protection of landscape features" has been placed in the rules, which means landscape is not voluntary as claimed.

**Relief Sought:** Delete this provision.

## **V2-S-3.7 - Subdivision, 3.7**

**N Z Institute of Surveyors - Participant #: 3 Submission #: 90**  
Leave in the bullet point and allow the Discretionary % to be advised.

**Relief sought:** Leave in the bullet point and allow the Discretionary % to be advised.

## **V2-S-3.7.2 - Subdivision, new rule 3.7.2**

**Department of Conservation - Participant #: 229 Submission #: 5460**  
Proposed new rule is supported in principle. However to avoid confusion, consistent terminology should be used. The rule would also benefit from a more explicit description of the features within this definition.

**Relief Sought:** 1. Retain rule 3.7.2 but replace reference to "significant environmental features" with "significant natural features".

2. Add the following explanation to the rule: "Significant natural features will include naturally occurring wetlands, remnant stands of native forest or indigenous vegetation, prominent headlands and ridgelines, and natural geomorphological features, such as the series of gravel ridges and wetlands at Rarangi."

**New Zealand Winegrowers - Participant #: 39 Submission #: 430**  
NZ Winegrowers opposes this new rule on the basis that it will allow subdivision in the rural zone below 8ha. There are more appropriate mechanisms under the RMA to protect significant environmental features such as specific plan provisions or zoning and under property law. The rule fails to establish why allowing smaller allotments on subdivision will provide any greater protection for significant environmental features.

**Relief Sought:** Delete rule in its entirety.

**O'Malley, Kaye - Participant #: 62 Submission #: 536**  
The proposed rule is incorrect. Rule 3.2 is about discretionary allotment standards for a range of zones, but does not include the envisaged "smaller sized lots for residential purposes" that the rule refers to. Both the new rule and the rule 3.2 table to which it refers need to be amended.

Use should be made of an existing provision that is spatially appropriate for rural locations. It is suggested that Rural Residential zone subdivision provisions be added to rule 3.2, with a cross reference to rule 3.7.4 and linkage to rule 2.3 (access).

**Relief Sought:** 1. Amend proposed rule 3.7.2 as follows:  
"As compensation for the creation of such a lot or lots, smaller sized lots of Rural Residential proportions may be created in accordance with rule 3.2 above...The maximum number of smaller sized lots for Rural Residential purposes which may be created...as a result of a subdivision for that particular rural zone which meets the..."

2. Add an additional provision to the rule 3.2 subdivision table, that relates the new rule 3.7.4 and enable subdivision of Rural Residential proportions to occur, as a consequence of protecting environmental features.

**O'Malley, Kaye - Participant #: 62 Submission #: 535**  
This has the same rule number as current number 3.7.2 "Boundary Adjustments" which is proposed to remain.

**Relief Sought:** Make rule 3.7.2 rule 3.7.4, replacing current rule 3.7.4 which is proposed to be deleted.

**Alexander ,M G et al. (See Appendix 1 for the full list submitters requesting this relief).**

Under 3.7.2(a), there is no definition for "significant" environmental features.

**Relief Sought:** Delete 3.7.2 (a).

## **V2-S-3.7.4 - Subdivision, 3.7.4**

**E D Townley Limited - Participant #: 85 Submission #: 1183**

The existing provision (pre V variation 38) is an appropriate way of enabling land owners to provide for themselves whilst at the same time ensuring amalgamation of land adjoining.

**Relief Sought:** Delete the relevant variation provisions.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 92**

There is no need to change this rule as it provides for subdivision in certain circumstances.

**Relief Sought:** Leave Rule 3.7.4 as is.

**Otuwhero Estate Limited - Participant #: 7 Submission #: 157**

The existing provision (pre V variation 38) is an appropriate way of enabling land owners to provide for themselves whilst at the same time ensuring amalgamation of land adjoining.

**Relief Sought:** Delete the relevant variation provisions.

**Wilson Martyn - Participant #: 45 Submission #: 451**

There is no need to change this rule as it provides for subdivision in certain circumstances. I oppose the deletion of rule 3.7.4

**Relief Sought:** The rule should be left as it is.

## **V2-S-3.7.new - Subdivision, 3.7, new bullet point**

**Department of Conservation - Participant #: 229 Submission #: 5459**

Additional bullet point is supported. To avoid confusion, consistent terminology should be used.

**Relief Sought:** Amend new bullet pint to read: "To facilitate the protection of significant natural features."

**Royal Forest & Bird Protection Society of New Zealand - Participant #: 28**

**Submission #: 315**

Support in part.

**Relief Sought:** Support in part

**Hadley Consultants-Civil & Structural Engineers - Participant #: 65 Submission #: 6569**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6641**

**Hadley, J A & J P - Participant #: 63 Submission #: 588**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6736**

**Tu Jaes Trust - Participant #: 64 Submission #: 6460**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6709**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6816**

**Wharehunga Trust - Participant #: 70 Submission #: 6887**

Reason for the added bullet point is not clear. The change already exists in the listed

**Relief Sought:** Clarify

## **V2-SR-1.3 - Std Requirements, 1.3, amended bullet point**

**Horticulture New Zealand - Participant #: 27 Submission #: 286**

The reference should be to "greenhouses" as not all indoor operations are in glass.

In addition, the amended provision refers to a range of sites that are specifically linked to hotspot sites and so the requirement should be clear that the site contamination is limited to hotspots from the prior existence of activities that may have led to historic residues.

**Relief Sought:** 1. Amend to refer to "greenhouses" not "glasshouses"  
2. Amend second to last bullet point in 1.3.5 to read as follows: "Any hot spot site contamination from historic activities such as sheep dips, chemical storage sites, rural dump sites or green houses."

**Hadley Consultants-Civil & Structural Engineers - Participant #: 6555**

**Hadley Reese Partnership - Participant #: 66 Submission #: 6585**

**Hadley, J A & J P - Participant #: 63 Submission #: 589**

**J A Hadley Family Trust - Participant #: 68 Submission #: 6791**

**Tu Jaes Trust - Participant #: 64 Submission #: 6481**

**Wharehunga Forestry (2004) Limited - Participant #: 67 Submission #: 6708**

**Wharehunga Forestry Limited - Participant #: 69 Submission #: 6817**

**Wharehunga Trust - Participant #: 70 Submission #: 6919**

Supported

**Relief Sought:** None specified

## **V2-TOC - Table of Contents**

**Outer Limits Limited - Participant #: 48 Submission #: 475**

**Relief Sought:** 1. Amend new appendix L to equate to reduced number of properties to be included in the Rose St West Residential zoning as shown on the attached plan (attached to submission).  
2. Add new Appendix M to include all the properties that are to be included in the new Business (Large Format retail) zone to the west of Rose St.

## **V2-UR-1.1 - Urban Residential, 1.1**

**Outer Limits Limited - Participant #: 48 Submission #: 476**

**Relief Sought:** Amend the permitted activities list "Residential activity with the exception..." to only include those properties within the reduced Residential zoned area.

## **V3-Gen - Maps-General Comments**

**Adams Land Nursery & P D & M Lloyd - Participant #: 46 Submission #: 452**

There is no mention of the problematic complaints on the perimeter of residential area around Blenheim. If the council put in and maintained a Rural Residential buffer zone where the residents would know that they were entering an area that would occasionally have loud agricultural and viticulture noise levels. It is disturbing that the council has allowed viticulture right up to the boundary of town. Those residents never envisaged having helicopters etc operating for many nights in spring.

These types of areas should be made into a buffer zone of 1 acre (4000m<sup>2</sup>) Rural Residential lots

**Relief Sought:** Rezone a buffer area of 4000m<sup>2</sup> Rural Residential around the urban area.

**Clifford, N S & M E - Participant #: 40 Submission #: 437**

A small area of land owned by the submitter on the edge of the urban zone should be rezoned to permit allotments of 4000 square metres as a transitional zone. That land is Lot 2 DP8624 and Lot 12 DP2247, noted on sheet 7 of the maps, covering 5.7ha. The 1ha minimum is unwise use of land as the area could sustain a more intensive development from 5 allotments to 9 or 10.

Vol 2 r 2.2 page 84 contemplates a net minimum area of 1200 square minimum. That area is compatible within residential development along the boundary of the submitters land.

**Relief Sought:** That the area be rezoned as Urban Residential 2 to permit more intensive development thereby relieving other areas of intensified development.

**Gray, Mike & Karen - Participant #: 19 Submission #: 182**

Residential zoning was bought to our back fence in 1994. We were informed that as we were self sufficient in water and sewerage and the council could not provide these for us at that time, we would stay zoned Rural 3 until those services could be provided. Since then we have fought several attempts to establish industrial or commercial operations in the old wood and coal site.

In 2002 nearly all landowners on the east side of Battys Rd submitted a petition to the council to have our 8 sections rezoned from Rural 3 to urban residential. Council passed a resolution in response that "the landowners who sought rezoning be advised that their request for a variation to the...plan will be considered as part of the council's review of the provisions regarding the Rural 3 zone."

Variation 38 (pg 49) states that the main concern of the area to be rezoned is the risk of flooding. Since the Covent gardens subdivision has gone in, all our properties have noticed a reduction in surface water. Over the last 3 years our place has dried up significantly.

We wish to have the urban residential zone extended out to the natural boundary of Battys road to include no. 31.

**Relief Sought:** Rezone the 8 sections on the east side of Battys Rd (including no. 31) as Urban Residential 2.

**J & R K de Castro Limited - Participant #: 214 Submission #: 5397**

There appears to be little thought given to the rezoning of larger areas of rural land to Urban Residential. The area of Urban Residential 2 is extremely limited. The Davie Lovell Smith report identified a number of potential growth areas, with one of these being the balance of the de Castro land. This land meets all the criteria in the Davie Lovell Smith report for new residential development. Rezoning this area would be a logical extension allowing for future residential development, whilst retaining a compact and coherent urban form.

It is appropriate that future urban areas for expansion be identified under variation 38.

As the plan is still not operative, the option to submit a private plan change is not feasible unless sponsored by council.

**Relief Sought:** On planning map "zoning 4, sheets 8 and 18", rezone sect 35 Opawa District - Alabama Rd (north side) from Rural 3 to Urban Residential 2.

**N Z Institute of Surveyors - Participant #: 3 Submission #: 100**

Land to be rezoned for Urban Residential 2 is extremely limited. There is no provision for future expansion for residential development. There is currently not sufficient land for the expected growth in Marlborough. With the Plan not operative, the plan change scenario is ideal, but not very practical. With the plan not operative, rezoning needs to be accepted by the Council and they need to instigate the change.

The plan change process is unwieldy, long winded and expensive.

**Relief Sought:** Alteration to the planning maps to include further rezoning of Rural 3 land to Urban Residential

**Tyrone Park Limited - Participant #: 235 Submission #: 5525**

Industrial zoning is consistent with the land use activities that have existed for many years and are currently operating. Resource consent has been obtained for these activities and to expand the activities on the site. It is consistent with the resource consent and the current and future uses, to revisit the zoning of the site. Rezoning this site would not detract from the available Rural 3 zoned land.

**Relief Sought:** 1. Rezone Lot 1 DP 10154 from Rural 3 to Industrial 1 (located on the west side of state highway 6 to the north of the intersection with Tucks Rd, north of Renwick) or;



2. Alternatively, that the council initiate a variation for the rezoning of this site from Rural 3 to Industrial 1.

### **V3-M2 - Map 2-Waterlea Racecourse**

#### **Marlborough Racing & Harness Racing Club - Participant #: 1**

The Marlborough Racing & Harness Racing Club who own Waterlea Racecourse wish the zoning to remain Rural 3.

Council expresses concern in the Variation that the current Rural 3 zoning is inappropriate given that it is bordered to the east and west by residential urban residential zones and if the property was developed under permitted activity rules for Rural 3 there is potential for a zoning clash. The Marlborough Racing and Harness Club can give categorical assurance that they have no intention to develop their land at Waterlea for wine production, horticulture or other intensive agricultural production that would result in a zoning clash.

With this assurance in place the Club submits that the opportunities for visionary planning outlined on page 38 of the Variation document still exist under the Rural 3 zoning.

**Relief Sought:** Maintain the status quo (don't rezone)

### **V3-M3 - Map 3-Rose Street West**

#### **Grand Designs Limited - Participant #: 44 Submission #: 450**

We understand that no specific tests have been undertaken by MDC to establish the presence (or not) of rural contaminants at all the properties on the west side of Rose St.

If individual property owners submit evidence that contaminants are not present / have been removed, this will be held on file of public reference. For example, our property (Lot 1 DP 9157, 25 Rose St) has been certified for organic production following remediation works to remove contamination. Providing the above understanding is correct, we confirm our support for the proposed rezoning of Rose St as set out into the variation.

**Relief Sought:** Support rezoning

#### **NZ Automobile Association Incorporated - Participant #: 240 Submission #:**

The association accepts the change to Rose Street to residential as it reflects existing use to some extent.

The association does not support an extension to this area or establishment of industrial or commercial use because of adverse effect on the SH6 intersection.

**Relief Sought:** None specified

#### **Outer Limits Limited - Participant #: 48 Submission #: 479**

Amend maps zoning 2 & 4 sheets 1, 4 & 18 to the reduced residential areas shown in the

**Relief Sought:** The submitter seeks that provisions be made for the zoning of the submitters land to provide for residential activity over part of its holdings.

#### **Outer Limits Limited - Participant #: 48 Submission #: 480**

Add new area on maps zoning 2 & 4, sheets 1, 4 & 18 being the proposed new business (large format retail) zone on those properties as shown on the plan attached to the submission.

**Relief Sought:** The submitter seeks that provisions be made for the zoning of the submitters land to provide for Large Format Retail zone over part of the land.

#### **Robinson Developments Limited - Participant #: 47 Submission #: 455**

The submitter has an interest in several properties in Rose St proposed for rezoning. The rezoning of the Rose St properties is a logical and contained extension of the urban periphery and consistent with the immediate environment. The proposal is consistent with the RMA. Rezoning these properties will assist in satisfying evidenced demand for additional residential opportunities in

Blenheim and the District and in so doing assist the sustainability and well-being of the environment, community, and economy.

**Relief Sought:** Approve the rezoning of properties in Rose St.

### **V3-M4 - Map 4-Battys Road/David & Severne Streets**

#### **Bridges E B - Participant #: 15 Submission #: 176**

The future urban / Rural Residential zoning plan needs to be extended to encompass properties south of David St: east and west of Battys Rd to include both sides of Yelverton Stream and in particular property Lot 1 DP 6375. This lot is 3.2375ha and not an economic unit for farm-viticulture or produce, being situated in a frost zone area and too small for sustained income. Including this property would enhance many of the objectives in the proposed variation.

**Relief Sought:** Rezone the following area as future urban / Rural Residential: properties south of David St: east and west of Battys Rd to include both sides of Yelverton Stream and in particular property Lot 1 DP 6375

#### **Lindstrom, Clayton & Wendy - Participant #: 226 Submission #: 5426**

Support rezoning our 8 properties on the east side of Battys Rd to Urban Residential 2. In keeping with the remainder of the land adjoining our land. We have fought several attempts to establish industrial and commercial operations in the old Wood & Coal site.

**Relief Sought:** Rezone from Rural 3 to Urban Residential 2 as proposed.

#### **Lindstrom, T G & Hegglin M A - Participant #: 224 Submission #: 5419**

We support having our land (35 Battys Rd) rezoned from Rural 3 to Urban Residential 2. Rezoning the 8 sections on the east side of Battys Rd to Urban Residential 2 would be in keeping with the remainder of the land adjoining our properties.

**Relief Sought:** Rezone the 8 sections in the east side of Battys Rd from Rural 3 to Urban Residential 2 ( as proposed).

#### **NZ Automobile Association Incorporated - Participant #: 240 Submission #:**

The association reluctantly accepts the change from rural to residential and that it reflects the progressive urban type development which has occurred. It accepts that eventually the speed limit on Battys Rd will reflect the zoning and be reduced to perhaps 60 kph.

It is essential that council ensure that all adjoining Battys Road development has adequate off street parking to ensure that Battys Road can continue to meet its function as an arterial and safely and efficiency provide for vehicles, cycles and pedestrians.

Given the level of development; provision of sewer; anticipated speed limit and ; obligation to install services, it is suggested that the proposed area of rezoning be reviewed. Development along both sides of the road would better reflect the status quo, make better use of services, and better justify the reduced speed on Battys Rd.

**Relief Sought:** Review the extent of the rezoning.

#### **William Haugh Enterprises Limited - Participant #: 230 Submission #: 5461**

Extend the area of proposed rezoning (from Rural 3 to Rural 3 Future Urban Residential 2) to south side of Yelverton Stream (old Fairhall) to include part Willowhaugh Enterprises land to Purkiss St (plan attached to submission).

**Relief Sought:** Extend the area of proposed rezoning (from Rural 3 to Rural 3 Future Urban Residential 2) to south side of Yelverton Stream (old Fairhall) to include part Willowhaugh Enterprises land to Purkiss St (plan attached to submission).

#### **Wilson, Ken - Participant #: 79 Submission #: 1087**

Oppose the rezoning. The character of the area reflects more extensive zoning and making half the street different does not seem like good planning. Plan now for appropriate infrastructure and do it all together as one street.

**Relief Sought:** Amend map so that all of David St and all of Severne St been taking into the rezoning from Rural 3 to Urban Residential 2.

### **V3-M5 - Map 5 –Barry Street**

#### **Assets & Services Department Staff MDC - Participant #: 215 Submission #:**

Following a meeting with Asset and Services, Marlborough Roads and Environmental Policy staff on 21st June 2006, it was concluded that the extent of the future Residential 2 zone in the Battys Rd/Bary St area be limited. Reasons are:

- to maintain arterial road integrity
- retain 80kph zone along Battys Rd
- respond to limited to access potential
- to better manage servicing requirements
- to tidy up concerns over the piece of orphan R3 land (Purkiss St area).

In addition, parts of the area have accessways which are inadequate to service "closer" subdivision under urban residential 2 zoning.

**Relief Sought:** Reduce / limit the area proposed for rezoning (Bary St/Battys Rd) [map attached to

#### **Marlborough Roads - Participant #: 88 Submission #: 1267**

Battys/David/Severne Streets require an indicative roading pattern such that there is a connecting road from David St to Severne St.

Battys Rd is on an arterial route and should not have additional intersections south of David St. This is consistent with new policies.

**Relief Sought:** Provide a new connecting road from David St to Severne St.

#### **Marlborough Roads - Participant #: 88 Submission #: 1268**

Extension of Bary St should be Rural Residential. The Bary St access road is 10m wide and right of way to the west off the end of legal road is 5.5m, insufficient for future development.

**Relief Sought:** Change zoning at end of Bary St to Rural Residential.

## **Appendix 1. Alexander ,M G et al. – Full list of individual submitters.**

Council received the same submission from the following people, the full list of submitters has been abbreviated in the above Summary of Submissions to “Alexander ,M G et al” to reduce replication of material and subsequently make it easier for people to use the summary.

<b>Alexander ,M G</b>	<b>Participant #: 108</b>
<b>Anderson, E A</b>	<b>Participant #: 143</b>
<b>Anderson, Tim</b>	<b>Participant #: 142</b>
<b>Avery, K F</b>	<b>Participant #: 106</b>
<b>Baldwin, A J</b>	<b>Participant #: 200</b>
<b>Baldwin, Bruce</b>	<b>Participant #: 199</b>
<b>Barriball, L R</b>	<b>Participant #: 107</b>
<b>Bevan, M A</b>	<b>Participant #: 128</b>
<b>Bissell, Ivor</b>	<b>Participant #: 118</b>
<b>Blick, Brian</b>	<b>Participant #: 182</b>
<b>Blick, George</b>	<b>Participant #: 90</b>
<b>Blick, Hayden</b>	<b>Participant #: 89</b>
<b>Blick, Sheryl</b>	<b>Participant #: 183</b>
<b>Bown, P G &amp; B A</b>	<b>Participant #: 237</b>
<b>Briggs, Fiona</b>	<b>Participant #: 91</b>
<b>Butt,Jim</b>	<b>Participant #: 122</b>
<b>Cambridge, Michael</b>	<b>Participant #: 207</b>
<b>Chapman, E J</b>	<b>Participant #: 104</b>
<b>Chapman, Helen</b>	<b>Participant #: 156</b>
<b>Chapman, M W</b>	<b>Participant #: 103</b>
<b>Chapman, Murray</b>	<b>Participant #: 83</b>
<b>Chapman, R A</b>	<b>Participant #: 105</b>
<b>Coyle, M</b>	<b>Participant #: 130</b>
<b>Currie, M K J</b>	<b>Participant #: 140</b>
<b>Currie, P M</b>	<b>Participant #: 141</b>
<b>Dawkins, C J</b>	<b>Participant #: 92</b>
<b>Dawkins, David</b>	<b>Participant #: 94</b>
<b>Dawkins, J C</b>	<b>Participant #: 93</b>
<b>Deans, Cory</b>	<b>Participant #: 121</b>

<b>Dick Bruce</b>	<b>Participant #: 203</b>
<b>Dick Nola</b>	<b>Participant #: 204</b>
<b>Donovan, Patrick</b>	<b>Participant #: 184</b>
<b>Eade, John</b>	<b>Participant #: 179</b>
<b>Ensor, Ben</b>	<b>Participant #: 190</b>
<b>Ensor, Edward</b>	<b>Participant #: 187</b>
<b>Ensor, Helen</b>	<b>Participant #: 188</b>
<b>Evans, D K T</b>	<b>Participant #: 212</b>
<b>Evans, E.M</b>	<b>Participant #: 244</b>
<b>Evans, Geoff</b>	<b>Participant #: 243</b>
<b>Evans, Geoffrey Ian T &amp; Elizabeth Mary</b>	<b>Participant #: 87</b>
<b>Fleming, Lisa</b>	<b>Participant #: 189</b>
<b>Foley, Chris</b>	<b>Participant #: 145</b>
<b>Foley, John</b>	<b>Participant #: 144</b>
<b>Gifford Allan</b>	<b>Participant #: 233</b>
<b>Goulter Annette</b>	<b>Participant #: 202</b>
<b>Gray, S J</b>	<b>Participant #: 129</b>
<b>Hammond, Chris</b>	<b>Participant #: 157</b>
<b>Hammond, Elaine</b>	<b>Participant #: 159</b>
<b>Hammond, Jeff</b>	<b>Participant #: 160</b>
<b>Hammond, Murray</b>	<b>Participant #: 158</b>
<b>Hawkins, Dianne</b>	<b>Participant #: 96</b>
<b>Henderson, Philip</b>	<b>Participant #: 133</b>
<b>Henderson, Robyn</b>	<b>Participant #: 134</b>
<b>Hickman, G</b>	<b>Participant #: 171</b>
<b>Hickman, K</b>	<b>Participant #: 172</b>
<b>Higgs, N M</b>	<b>Participant #: 139</b>
<b>Higgs, P M</b>	<b>Participant #: 137</b>
<b>Higgs,H P</b>	<b>Participant #: 138</b>



<b>Huddleston, Kim</b>	<b>Participant #: 95</b>
<b>Huddleston, Paul</b>	<b>Participant #: 97</b>
<b>Hull, Judy</b>	<b>Participant #: 206</b>
<b>Jackson, D R</b>	<b>Participant #: 174</b>
<b>Jackson, S</b>	<b>Participant #: 173</b>
<b>Jones, C</b>	<b>Participant #: 167</b>
<b>Jones, G</b>	<b>Participant #: 168</b>
<b>Laugesen, Richard</b>	<b>Participant #: 117</b>
<b>Laurenson, Jeremy</b>	<b>Participant #: 180</b>
<b>Laurenson, Rosemary</b>	<b>Participant #: 181</b>
<b>Lawrence, Kay</b>	<b>Participant #: 135</b>
<b>Lynskey, Ray</b>	<b>Participant #: 132</b>
<b>Maasdam, Ruud</b>	<b>Participant #: 115</b>
<b>MacDonald, D B</b>	<b>Participant #: 175</b>
<b>Mackenzie, Aiden</b>	<b>Participant #: 210</b>
<b>Mackenzie, Alison</b>	<b>Participant #: 209</b>
<b>Mapp, Jennifer</b>	<b>Participant #: 213</b>
<b>Mapp, Roland</b>	<b>Participant #: 211</b>
<b>Mason, B D</b>	<b>Participant #: 100</b>
<b>Mason, Chris</b>	<b>Participant #: 102</b>
<b>Mason, J</b>	<b>Participant #: 101</b>
<b>McCaig, Bernadette</b>	<b>Participant #: 154</b>
<b>Mitchell, D</b>	<b>Participant #: 169</b>
<b>Mitchell, S</b>	<b>Participant #: 170</b>
<b>Moore, Anthony</b>	<b>Participant #: 153</b>
<b>Moore, Paula</b>	<b>Participant #: 150</b>
<b>Mullen, Nicola</b>	<b>Participant #: 178</b>
<b>Murphy, G</b>	<b>Participant #: 146</b>
<b>Murphy, Judith</b>	<b>Participant #: 147</b>

<b>Newman, Bertha</b>	<b>Participant #: 197</b>
<b>Newman, M C</b>	<b>Participant #: 198</b>
<b>Pilcher, S J</b>	<b>Participant #: 98</b>
<b>Pilcher, S M</b>	<b>Participant #: 99</b>
<b>Pope, D C</b>	<b>Participant #: 136</b>
<b>Pope, Noel</b>	<b>Participant #: 155</b>
<b>Powell, Maureen</b>	<b>Participant #: 176</b>
<b>Powell, Tom</b>	<b>Participant #: 177</b>
<b>Prosser, Ron</b>	<b>Participant #: 109</b>
<b>Put, Lee</b>	<b>Participant #: 131</b>
<b>Rattray, P</b>	<b>Participant #: 166</b>
<b>Rive ,Willie</b>	<b>Participant #: 124</b>
<b>Rive, Anne</b>	<b>Participant #: 125</b>
<b>Rive, G R</b>	<b>Participant #: 126</b>
<b>Rodger, Michael</b>	<b>Participant #: 196</b>
<b>Rodger, Rachel</b>	<b>Participant #: 195</b>
<b>Rowsell Steve</b>	<b>Participant #: 205</b>
<b>Rudd, A L</b>	<b>Participant #: 114</b>
<b>Rudd, K D</b>	<b>Participant #: 112</b>
<b>Rudd, L A</b>	<b>Participant #: 111</b>
<b>Rudd, S G</b>	<b>Participant #: 113</b>
<b>Russell L M</b>	<b>Participant #: 201</b>
<b>Ryan, Brendon</b>	<b>Participant #: 163</b>
<b>Ryan, Colettte</b>	<b>Participant #: 164</b>
<b>Shanks, A F</b>	<b>Participant #: 127</b>
<b>Sorensen, Graeme</b>	<b>Participant #: 186</b>
<b>Sorensen, Joan</b>	<b>Participant #: 185</b>
<b>Stringer, Diana</b>	<b>Participant #: 73</b>
<b>Tapp, N M</b>	<b>Participant #: 165</b>

<b>Taylor, Chantal</b>	<b>Participant #: 194</b>
<b>Taylor, Wayne</b>	<b>Participant #: 193</b>
<b>Thompson, Zoe</b>	<b>Participant #: 208</b>
<b>Trolove, David</b>	<b>Participant #: 161</b>
<b>Trolove, Lucy</b>	<b>Participant #: 162</b>
<b>Tucker , Sean</b>	<b>Participant #: 119</b>
<b>Tucker, Jaequi</b>	<b>Participant #: 120</b>
<b>Vermaas, Dorien</b>	<b>Participant #: 116</b>
<b>Wadsworth, Debbie</b>	<b>Participant #: 192</b>
<b>Wadsworth, Melvyn</b>	<b>Participant #: 110</b>
<b>Wadsworth, Trevor</b>	<b>Participant #: 191</b>
<b>Wall, John</b>	<b>Participant #: 149</b>
<b>Wall, Raewyn</b>	<b>Participant #: 148</b>
<b>Wallace, Rachael</b>	<b>Participant #: 152</b>
<b>Wallace, Russell</b>	<b>Participant #: 151</b>
<b>White, S T &amp; S</b>	<b>Participant #: 75</b>
<b>Wright ,Ross</b>	<b>Participant #: 123</b>

## Appendix 2: CONTACT DETAILS FOR SUBMITTERS IN ALPHABETICAL ORDER

Participant Number	Name	Address	Address	Address	Address	Contact
46	Adams Land Nursery & P D & M Lloyd	138 Battys Road	Blenheim 7210			P D Lloyd
4	Adams S J	28 Wratts Road	RD 3	Blenheim 7273		Jim Adams
51	Adcock Paul & Devir Nicki	37 Havelock Street	Renwick	Blenheim 7204		
81	Adcock, G & B V	45 Godfrey Road	RD 2	Blenheim 7272		
82	Adcock, Ian	45 Godfrey Road	RD 2	Blenheim 7272		
108	Alexander ,M G	The Teme	RD 6	Blenheim 7276		
54	Anderson, Bruce	60 Havelock Street	Renwick	Blenheim 7204		
143	Anderson, E A	120 Shandon Road	RD 6	Blenheim 7276		
142	Anderson, Tim	120 Shandon Road	RD 6	Blenheim 7276		
215	Assets & Services Department Staff MDC	C/O PO Box 443	Blenheim 7240			Jon Cunliffe
106	Avery, K F	Camphill	RD 6	Blenheim		
43	Ayson & Partners Limited	PO Box 256	Blenheim 7240			Vern Ayson
200	Baldwin, A J	255 Tyntesfield Road	RD 6	Blenheim 7276		
199	Baldwin, Bruce	255 Tyntesfield Road	RD 6	Blenheim 7276		
236	Barnet,, GJ & J S	132 Tua Marina Track	RD 3	Blenheim 7273		Gary Barnett
107	Barriball, L R	The Teme	RD 6	Blenheim 7276		
59	Ben Morven Partnership	Ben Morven	RD 2	Blenheim 7272		Kevin Hayes

Participant Number	Name	Address	Address	Address	Address	Contact
128	Bevan, M A	Te Ra Whiti	RD 6	Blenheim 7276		
118	Bissell, Ivor	1770 Weaihopai Valley Road	RD 6	Blenheim 7276		
78	Blenheim Backpackers Collective	29 Park Terrace	Blenheim 7201			Rob Lawrence
182	Blick, Brian	588 Waihopai Valley Road	RD 6	Blenheim 7276		
90	Blick, George	1397 Waihopai Valley	RD 6	Blenheim 7276		
89	Blick, Hayden	1397 Waihopai Valley	RD 6	Blenheim 7276		
183	Blick, Sheryl	588 Waihopai Valley Road	D 6	Blenheim 7276		
56	Boon, D R & S A	99 Leslies Road	RD 1	Havelock 7178		
222	Bowen, D A W	C/O Survey Solutions NZ Limited	PO Box 189	Blenheim 7240		Perry Gilbert
237	Bown, P G & B A	Te Rou	RD 5	Blenheim 7275		
15	Bridges E B	97 Battys Road	Blenheim 7201			
91	Briggs, Fiona	135 Waihopai Valley	RD 6	Blenheim 7276		
57	Bruckel, Paul	875 Waihopai Road	RD 6	Blenheim 7276		
13	Butt Drilling Limited	4 Springswood Grove	Blenheim 7201			John Butt
122	Butt, Jim	2547 Waihopai Valley Road	RD 6	Blenheim 7276		
207	Cambridge, Michael	81 Parker Street	Blenheim 7201			
104	Chapman, E J	Quaildale	RD 6	Blenheim 7276		
156	Chapman, Helen	Quaildale	1566 Waihopai Valley Road	RD 6	Blenheim 7276	

Participant Number	Name	Address	Address	Address	Address	Contact
103	Chapman, M W	Quaildale	RD 6	Blenheim 7276		
83	Chapman, Murray	Quaildale	RD 6	Blenheim 7276		
105	Chapman, R A	Quaildale	RD 6	Blenheim 7276		
40	Clifford, N S & M E	Dew & Company Lawyers	PO Box 889	Blenheim 7240		G. R Hill
23	Clintondale Trust	Whyte Trustee Company Limited	H10, Tai Mei Tuk	Plover Cove, Tai Po	New Territories, Hong Kong	David Whyte
130	Coyle, M	2716 Waihopai Valley Road	Blenheim 7276			
140	Currie, M K J	58 Shandon Road	RD 6	Blenheim 7276		
141	Currie, P M	58 Shandon Road	RD 6	Blenheim 7276		
92	Dawkins, C J	Pyramid	Waihopai Valley	RD 6	Blenheim 7276	
94	Dawkins, David	Pyramid	Waihopai Valley	RD 6	Blenheim 7276	
93	Dawkins, J C	Pyramid	Waihopai Valley	RD 6	Blenheim 7276	
121	Deans, Cory	1727 Waihopai Valley Road	Blenheim 7276			
229	Department of Conservation	Nelson/Marlborough Conservancy	Private Bag 5	Nelson 7040		Joanna Gould
203	Dick Bruce	The Rock	RD 6	Blenheim 7276		
204	Dick Nola	The Rock	RD 6	Blenheim 7276		
31	Dodson, R C & J W	204 Cable Station Road	R D 1	Seddon 7285		Rex Dodson
184	Donovan, Patrick	PO Box 62	Renwick	Blenheim 7243		
85	E D Townley Limited	C/O McFadden McMeeken Phillips	PO Box 656	Nelson 7040		E D Townley
179	Eade, John	710 Waihopai Valley Road	RD 6	Blenheim 7276		



Participant Number	Name	Address	Address	Address	Address	Contact
190	Ensor, Ben	455 Tyntesfield Road	RD 6	Blenheim 7276		
187	Ensor, Edward	485 Tyntesfield Road	RD 6	Blenheim 7276		
188	Ensor, Helen	485 Tyntesfield Road	RD 6	Blenheim 7276		
212	Evans, D K T	Stronvar	RD 6	Blenheim 7276		
244	Evans, E.M	Stronvar	RD 6	Blenheim 7276		
243	Evans, Geoff	Stronvar	RD 6	Blenheim 7276		
87	Evans, Geoffrey Ian T & Elizabeth Mary	Stronvar	RD 6	Blenheim 7276		Geoff Evans
241	Federated Farmers (Blenheim Branch)	1090 Rapaura Road	RD 3	Blenheim 7273		Alastair M Campbell
26	Federated Farmers of New Zealand (Inc)	Policy Advisor	PO Box 3068	Richmond	Nelson 7050	Alicia Duddy
225	Fitzgerald, Roger Myers	53 Fairbourne Drive	RD 2	Blenheim 7272		
16	Flaxbourne River Consent Holders Group	PO Box 6	Ward 7248			Brian Moore
189	Fleming, Lisa	455 Tyntesfield Road	RD 6	Blenheim 7276		
145	Foley, Chris	145 Shandon Road	RD 6	Blenheim 7276		
144	Foley, John	145 Shandon Road	RD 6	Blenheim 7276		
36	Gane, Graeme & Raewyn	114 Selmes Road	RD 3	Blenheim 7273		
37	Gane, Laurin	55 Mowat Street	Blenheim 7201			
34	Gane, Nev &	Selmesbrook	Selmes	RD 3	Blenheim	

Participant Number	Name	Address	Address	Address	Address	Contact
	Jenni	Vineyard	Road		7273	
233	Gifford Allan	PO Box 4	Renwick	Blenheim 7204		
232	Gilbert Haymes & Associates Limited	PO Box 380	Blenheim 7240			Graeme Haymes/Tony Hawke
221	Goodwin, T J & D I	Survey Solutions NZ Limited	PO Box 189	Blenheim 7240		Perry Gilbert
202	Goulter Annette	The Ruin	Waihopai Valley	RD 6	Blenheim 7276	
44	Grand Designs Limited	29 Rose Street	Blenheim 7201			Martin Ridgway
19	Gray, Mike & Karen	31 Battys Road	Springlands	Blenheim 7201		
129	Gray, S J	Te Ra Whiti	RD 6	Blenheim 7276		
2	H & J Meyers Partnership	33 Malthouse Road	RD 4	Riverlands	Blenheim 7274	Humphrey Meyers
65	Hadley Consultants-Civil & Structural Engineers	Rachel Reece Consulting Ltd	PO Box 1474	Nelson 7040		Rachel Reese
66	Hadley Reese Partnership	Rachel Reese Consulting Limited	PO Box 1474	Nelson 7040		Rachel Reese
63	Hadley, J A & J P	Rachel Reese Consulting Limited	PO Box 1474	Nelson 7040		Rachel Reese
157	Hammond, Chris	279 West Coast Road	RD 1	Blenheim 7271		
159	Hammond, Elaine	277 West Coast Road	RD 1	Blenheim 7271		
160	Hammond, Jeff	99 Waihopai Valley Road	RD 6	Blenheim 7276		
158	Hammond, Murray	277 West Coast Road	RD 1	Blenheim 7271		
239	Hawkesbury Farm Limited	334 Hawkesbury Road	RD 2	Blenheim 7272		R H Goulter
96	Hawkins,	Avondale Road	RD 6	Waihopai	Blenheim	

Participant Number	Name	Address	Address	Address	Address	Contact
	Dianne			Valley	7276	
231	Haymes, Graeme	PO Box 380	Blenheim 7240			
133	Henderson, Philip	683 Waihopai Valley Road	Blenheim 7276			
134	Henderson, Robyn	683 Waihopai Valley Road	Blenheim 7276			
171	Hickman, G	1095 Waihopai Valley Road	RD 6	Blenheim 7276		
172	Hickman, K	1095 Waihopai Valley Road	RD 6	Blenheim 7276		
55	Higgins, Mark & Katrina	861 Onamalutu Road	RD 5	Blenheim 7275		
139	Higgs, N M	55 Shandon Road	RD 6	Blenheim 7276		
137	Higgs, P M	55 Shandon Road	Blenheim 7276			
138	Higgs, H P	55 Shandon Road	Blenheim 7276			
27	Horticulture New Zealand	PO Box 10232	Wellington			Ken Robertson
95	Huddleston, Kim	Avondale Road	RD 6	Waihopai Valley	Blenheim 7276	
97	Huddleston, Paul	RD 6	Blenheim 7276			
206	Hull, Judy	Blackrock	RD 6	Blenheim 7276		
80	Hyson, Michael	195 Shandon Road	RD 6	Blenheim 7276		
214	J & R K de Castro Limited	Greenfields	Muller Road	Blenheim 7201		Stephen de Castro
68	J A Hadley Family Trust	Rachel Reese Consulting Limited	PO Box 1474	Nelson 7040		Rachel Reese
174	Jackson, D R	784 Waihopai Valley Road	RD 6	Blenheim 7276		
173	Jackson, S	784 Waihopai Valley Road	RD 6	Blenheim 7276		

Participant Number	Name	Address	Address	Address	Address	Contact
49	Jenkins, R J & R	76 Hardings Road	RD 4	Blenheim 7274		
6	Jerram P & A	135 O'Dwyers Road	RD 3	Blenheim 7273		Peter or Alison
167	Jones, C	630 Waihopai Valley Road	RD 6	Blenheim 7276		
168	Jones, G	630 Waihopai Valley Road	RD 6	Blenheim 7276		
14	Kerr D C	1144 Tuamarina Track	RD 3	Blenheim 7273		David C Kerr
86	La Plante, Steven	Te One	1679 Redwood Pass Road	RD 4	Blenheim 7274	
22	Landco Limited	PO Box 106249	Auckland City	Auckland 1143		Brad Nobilo
53	Lansdown, Sam	69 Gibsons Road	RD 3	Kaituna	Blenheim 7273	
38	Large, Marie	77 Hillocks Road	RD 3	Blenheim 7273		
32	Large, Matthew	44 Adams Lane	Blenheim 7201			
117	Laugesen, Richard	1700 Waihopai Valley Road	Blenheim 7276			
180	Laurenson, Jeremy	686 Waihopai Valley Road	RD 6	Blenheim 7276		
181	Laurenson, Rosemary	686 Waihopai Valley Road	RD 6	Blenheim 7276		
135	Lawrence, Kay	42 Shandon Road	RD 6	Blenheim 7276		
5	Leavesden Farm Limited	28 Wratts Road	RD 3	Blenheim 7273		Keith Adams
226	Lindstrom, Clayton & Wendy	33 Battys Road	Blenheim 7201			
224	Lindstrom, T G & Hegglun M A	35 Battys Road	Blenheim 7201			
132	Lynskey, Ray	1505 Waihopai Valley Road	Blenheim 7276			
115	Maasdam,	1734 Waihopai	Blenheim			

Participant Number	Name	Address	Address	Address	Address	Contact
	Ruud	Valley Road	7276			
175	MacDonald, D B	780 Waihopai Valley Road	RD 6	Blenheim 7276		
210	Mackenzie, Aiden	RD 6	Waihopai Downs	Blenheim 7276		
209	Mackenzie, Alison	RD 6	Waihopai Downs	Blenheim 7276		
213	Mapp, Jennifer	Spray Point	RD 6	Blenheim 7276		
74	Mapp, L C & V L	Pine Valley	RD 5	Blenheim 7275		
211	Mapp, Roland	Spray Point	RD 6	Blenheim 7276		
33	Marfell, Bridget	29 Shirtliff Street	Blenheim 7201			
42	Marfell, T S & J M	132 Booker Road	RD 2	Blenheim 7272		Terry Marfell
29	Markview Vineyard	168 Budge Street	Blenheim 7201			K N & D M Hodson
1	Marlborough Racing & Harness Racing Club	Ayson & Partners Ltd	PO Box 256	Blenheim 7240		E C Chapman-Cohen
88	Marlborough Roads	PO Box 1031	Blenheim 7240			Frank Porter
234	Marris, John & Alison	Senior Resource Management Planner	Glasson Potts Fowler Limited	PO Box 13875	Christchurch 8031	Brent Pizzey
100	Mason, B D	Avonlea Lodge	RD 6	Blenheim 7276		
102	Mason, Chris	Avonlea Lodge	RD 6	Blenheim 7276		
101	Mason, J	Avonlea Lodge	RD 6	Blenheim 7276		
216	Mason, Ralph Douglas	Avondale	RD 6	Blenheim 7276		
154	McCaig, Bernadette	877 Waihopai Valley Road	RD 6	Blenheim 7276		
169	Mitchell, D	661 Waihopai	RD 6	Blenheim		

Participant Number	Name	Address	Address	Address	Address	Contact
		Valley Road		7276		
170	Mitchell, S	661 Waihopai Valley Road	RD 6	Blenheim 7276		
72	Monk, Craig & Jo	1 Pattie Place	Blenheim 7201			
153	Moore, Anthony	877 Waihopai Valley Road	RD 6	Blenheim 7276		
150	Moore, Paula	202 Shandon Road	RD 6	Blenheim 7276		
30	Morris, Melanie	26 A Purkiss Street	Blenheim 7201			
178	Mullen, Nicola	3992 Waihopai Valley Road	RD 6	Blenheim 7276		
146	Murphy, G	164 Shandon Road	RD 6	Blenheim 7276		
147	Murphy, Judith	164 Shandon Road	RD 6	Blenheim 7276		
3	N Z Institute of Surveyors	C/O PO Box 256	Blenheim 7240			P Gilbert (Chairman)
8	New Zealand Defence Force	Hdqtrs N Z Defence Force	Private Bag	Wellington		Director Estates Policy
39	New Zealand Winegrowers	Bell Gully	PO Box 4199	Shortland Street	Auckland 1140	David McGregor / Marija Batistich
197	Newman, Bertha	293 Tyntesfield Road	RD 6	Blenheim 7276		
198	Newman, M C	Cowslip Valley	RD 6	Blenheim 7276		
228	Newport, Trevor & Yvonne					
220	Nicholls, K M & N P	C/O Survey Solutions NZ Limited	PO Box 189	Blenheim 7240		Perry Gilbert
240	NZ Automobile Association Incorporated	PO Box 104	Blenheim 7240			Kelston Swete
62	O'Malley,	Windrush	427 SH 63	RD 1	Blenheim	



Participant Number	Name	Address	Address	Address	Address	Contact
	Kaye				7271	
7	Otuwhero Estate Limited	McFadden McMeeken Phillips	Solicitors	PO Box 656	Nelson 7040	
48	Outer Limits Limited	PO Box 616	Blenheim 7240			Phil Robinson
58	Peace, Margaret	128 Blind Creek Road	RD 3	Blenheim 7273		
98	Pilcher, S J	The Guardian	RD 6	Blenheim 7276		
99	Pilcher, S M	The Guardian	RD 6	Blenheim 7276		
136	Pope, D C	42 Shandon Road	RD 6	Blenheim 7276		
155	Pope, Noel	1089 Waihopai Valley Road	RD 6	Blenheim 7276		
223	Powell, Brian & F	67 A High Street	Renwick	Blenheim 7204		
176	Powell, Maureen	682 Waihopai Valley Road	RD 6	Blenheim 7276		
177	Powell, Tom	682 Waihopai Valley Road	RD 6	Blenheim 7276		
109	Prosser, Ron	Redwood	RD 6	Blenheim 7276		
131	Put, Lee	3582 Waihopai Valley Road	Blenheim 7276			
238	PYG Limited	C/O Ayson & Partners Limited	PO Box 256	Blenheim 7240		Vern Ayson
17	Radich Family Trust	PO Box 646	Blenheim 7240			Peter Radich
166	Ratttray, P	470 Waihopai Valley Road	RD 6	Blenheim 7276		
21	Renwick Residents Association	86A McLauchlan St	Blenheim			C P Riley
41	Rewood Pass Vineyards	1667 Redwood Pass Road	RD 4	Blenheim 7274		Barry Feickert
124	Rive ,Willie	Tordarroch	RD 6	Blenheim 7276		
125	Rive, Anne	Tordarroch	RD 6	Blenheim		

Participant Number	Name	Address	Address	Address	Address	Contact
				7276		
126	Rive, G R	Tordarroch	RD 6	Blenheim 7276		
47	Robinson Developments Limited	C/O Planning Focus Limited	PO Box 911361	Auckland Mail Centre	Auckland 1142	Alistair White
196	Rodger, Michael	338 Tyntesfield Road	RD 6	Blenheim 7276		
195	Rodger, Rachel	338 Tyntesfield Road	RD 6	Blenheim 7276		
50	Rose, Peter Wallis	161 Cravens Road	RD 3	Blenheim 7273		
205	Rowsell Steve	Blackrock	RD 6	Blenheim 7276		
28	Royal Forest & Bird Protection Society of New Zealand	Top of the South Field Officer	PO Box 266	Nelson 7040		Debs Martin
114	Rudd, A L	Summerlands	RD 6	Blenheim 7276		
112	Rudd, K D	Summerlands	RD 6	Blenheim 7276		
111	Rudd, L A	Avon Valley	RD 6	Blenheim 7276		
113	Rudd, S G	Summerlands	RD 6	Blenheim 7276		
201	Russell L M	Mount Olympus	Waihopai Valley	RD 6	Blenheim 7276	
163	Ryan, Brendon	383 Waihopai Valley Road	RD 6	Blenheim 7276		
164	Ryan, Colette	383 Waihopai Valley Road	RD 6	Blenheim 7276		
20	Saxton, Frank	417 Wakefield Quay	Nelson 7010			
127	Shanks, A F	Benhopai	RD 6	Blenheim 7276		
61	Sherwood, Nancy	Las Fronteras	Wairau Valley	RD 1	Blenheim 7271	
60	Sherwood,	Las Fronteras	Wairau	RD 1	Blenheim	

Participant Number	Name	Address	Address	Address	Address	Contact
	Peter F		Valley		7271	
52	Slape, Kelvin	3 Rousehill Street	Renwick	Blenheim 7204		
186	Sorensen, Graeme	78 Tyntesfield Road	RD 6	Blenheim 7276		
185	Sorensen, Joan	78 Tyntesfield Road	RD 6	Blenheim 7276		
227	Stanton, Brian & Newport Sharon					
217	Stokes, Christopher Francis	C/O Gascoigne Wicks	PO Box 2	Blenheim 7240		Brian Fletcher
73	Stringer, Diana	1627 Waihopai Valley Road	RD 6	Blenheim 7276		
219	Sutherland, R D	C/O PO Box 751	Blenheim 7240			
165	Tapp, N M	450 Waihopai Valley Road	RD 6	Blenheim 7276		
18	Taylor Lachlan	PO Box 22	Ward 7248			
194	Taylor, Chantal	376 Tyntesfield Road	RD 6	Blenheim 7276		
193	Taylor, Wayne	376 Tyntesfield Road	RD 6	Blenheim 7276		
208	Thompson, Zoe	RD 6	Blenheim 7276			
11	Thomson H J	PO Box 2	Ward 7248			Herb Thomson
76	Traffic Design Group	PO Box 30721	Lower Hutt 5040			Dave Petrie
24	Transit New Zealand	Regional Planning Manager	PO Box 27477	Marion Square	Wellington 6141	Michael Weir
25	Transpower New Zealand Limited	Burton Consultants	PO Box 33817	Takapuna	North Shore City 0740	Yana Bosseva
161	Trolove, David	129 Waihopai Valley Road	RD 6	Blenheim 7276		
162	Trolove, Lucy	129 Waihopai Valley Road	RD 6	Blenheim 7276		

Participant Number	Name	Address	Address	Address	Address	Contact
10	TrustPower Limited	C/O Mitchell Partnerships	PO Box 489	Dunedin 9054		John Kyle
64	Tu Jaes Trust	Rachel Reece Consulting Limited	PO Box 1474	Nelson 7040		Rachel Reese
119	Tucker , Sean	1619 Waihopai Valley Road	RD 6	Blenheim 7276		
120	Tucker, Jaequi	1619 Waihopai Valley Road	RD 6	Blenheim 7276		
235	Tyrone Park Limited	Resource Management Group	PO Box 13792	Christchurch 8141		Katherine Snook
218	Tyson, Tony	596 Tua Marina Track	RD 3	Blenheim 7273		
242	Vercoe Ian Frank	51 Battys Road	Blenheim 7201			
116	Vermaas, Dorien	1734 Waihopai Valley Road	Blenheim 7276			
192	Wadsworth, Debbie	558 Tyntesfield Road	RD 6	Blenheim 7276		
110	Wadsworth, Melvyn	Redwood	RD 6	Blenheim 7276		
191	Wadsworth, Trevor	558 Tyntesfield Road	RD 6	Blenheim 7276		
149	Wall, John	162 Shandon Road	RD 6	Blenheim 7276		
148	Wall, Raewyn	162 Shandon Road	RD 6	Blenheim 7276		
152	Wallace, Rachael	748 Waihopai Valley Road	RD 6	Blenheim 7276		
151	Wallace, Russell	748 Waihopai Valley Road	Blenheim 7276			
12	Watson R & V	160 Battys Road	Blenheim 7201			
84	Weyerhaeuser New Zealand Limited	Private Bag 5	Richmond	Nelson 7050		Jenny Beale/ Phil Madill
67	Wharehunga Forestry (2004) Limited	Rachel Reese Consulting Limited	PO Box 1474	Nelson 7040		Rachel Reese
69	Wharehunga	Rachel Reese	PO Box	Nelson 7040		Rachel Reese

Participant Number	Name	Address	Address	Address	Address	Contact
	Forestry Limited	Consulting Limited	1474			
70	Wharehunga Trust	Rachel Reese Consulting Limited	PO Box 1474	Nelson 7040		Rachel Reese
75	White, S T & S	Te Rou Road	RD 5	Blenheim 7275		
230	William Haugh Enterprises Limited	Palms Limited	PO Box 751	Blenheim 7240	Attn Ron Sutherland	Roger Jordan
71	Williams, Peter & Dianne	PO Box 625	Blenheim 7240			
45	Wilson Martyn	C/O 27 Brooklyn Drive	Blenheim 7210			
79	Wilson, Ken	70 David Street	Blenheim 7201			
77	Witherhills Vineyards Marlborough Limited	114 New Renwick Road	RD 2	Blenheim		John Marris
9	Woodlands Marlborough Estate	189 B Selmes Road	RD 3	Blenheim 7273		David Pigou
35	Wratt, Quentin	Selmes Road	RD 3	Blenheim 7273		
123	Wright ,Ross	Banksia Cottage	RD 6	Blenheim 7276		

### Appendix 3: CONTACT DETAILS FOR SUBMITTERS IN ORDER OF PARTICIPANT NUMBER

Participant Number	Name	Address	Address	Address	Address	Contact
1	Marlborough Racing & Harness Racing Club	Ayson & Partners Ltd	PO Box 256	Blenheim 7240		E C Chapman-Cohen
2	H & J Meyers Partnership	33 Malthouse Road	RD 4	Riverlands	Blenheim 7274	Humphrey Meyers
3	N Z Institute of Surveyors	C/O PO Box 256	Blenheim 7240			P Gilbert (Chairman)
4	Adams S J	28 Wratts Road	RD 3	Blenheim 7273		Jim Adams
5	Leavesden Farm Limited	28 Wratts Road	RD 3	Blenheim 7273		Keith Adams
6	Jerram P & A	135 O'Dwyers Road	RD 3	Blenheim 7273		Peter or Alison
7	Otuwhero Estate Limited	McFadden McMeeken Phillips	Solicitors	PO Box 656	Nelson 7040	
8	New Zealand Defence Force	Hdqtrs N Z Defence Force	Private Bag	Wellington		Director Estates Policy
9	Woodlands Marlborough Estate	189 B Selmes Road	RD 3	Blenheim 7273		David Pigou
10	TrustPower Limited	C/O Mitchell Partnerships	PO Box 489	Dunedin 9054		John Kyle
11	Thomson H J	PO Box 2	Ward 7248			Herb Thomson
12	Watson R & V	160 Battys Road	Blenheim 7201			
13	Butt Drilling Limited	4 Springswood Grove	Blenheim 7201			John Butt
14	Kerr D C	1144 Tuamarina Track	RD 3	Blenheim 7273		David C Kerr
15	Bridges E B	97 Battys Road	Blenheim 7201			
16	Flaxbourne River Consent Holders	PO Box 6	Ward 7248			Brian Moore



Participant Number	Name	Address	Address	Address	Address	Contact
	Group					
17	Radich Family Trust	PO Box 646	Blenheim 7240			Peter Radich
18	Taylor Lachlan	PO Box 22	Ward 7248			
19	Gray, Mike & Karen	31 Battys Road	Springlands	Blenheim 7201		
20	Saxton, Frank	417 Wakefield Quay	Nelson 7010			
21	Renwick Residents Association	86A McLauchlan St	Blenheim			C P Riley
22	Landco Limited	PO Box 106249	Auckland City	Auckland 1143		Brad Nobilo
23	Clintondale Trust	Whyte Trustee Company Limited	H10, Tai Mei Tuk	Plover Cove, Tai Po	New Territories, Hong Kong	David Whyte
24	Transit New Zealand	Regional Planning Manager	PO Box 27477	Marion Square	Wellington 6141	Michael Weir
25	Transpower New Zealand Limited	Burton Consultants	PO Box 33817	Takapuna	North Shore City 0740	Yana Bosseva
26	Federated Farmers of New Zealand (Inc)	Policy Advisor	PO Box 3068	Richmond	Nelson 7050	Alicia Duddy
27	Horticulture New Zealand	PO Box 10232	Wellington			Ken Robertson
28	Royal Forest & Bird Protection Society of New Zealand	Top of the South Field Officer	PO Box 266	Nelson 7040		Debs Martin
29	Markview Vineyard	168 Budge Street	Blenheim 7201			K N & D M Hodson
30	Morris, Melanie	26 A Purkiss Street	Blenheim 7201			
31	Dodson, R C & J W	204 Cable Station Road	R D 1	Seddon 7285		Rex Dodson
32	Large, Matthew	44 Adams Lane	Blenheim 7201			

Participant Number	Name	Address	Address	Address	Address	Contact
33	Marfell, Bridget	29 Shirtliff Street	Blenheim 7201			
34	Gane, Nev & Jenni	Selmesbrook Vineyard	Selmes Road	RD 3	Blenheim 7273	
35	Wratt, Quentin	Selmes Road	RD 3	Blenheim 7273		
36	Gane, Graeme & Raewyn	114 Selmes Road	RD 3	Blenheim 7273		
37	Gane, Laurin	55 Mowat Street	Blenheim 7201			
38	Large, Marie	77 Hillocks Road	RD 3	Blenheim 7273		
39	New Zealand Winegrowers	Bell Gully	PO Box 4199	Shortland Street	Auckland 1140	David McGregor / Marija Batistich
40	Clifford, N S & M E	Dew & Company Lawyers	PO Box 889	Blenheim 7240		G. R Hill
41	Rewood Pass Vineyards	1667 Redwood Pass Road	RD 4	Blenheim 7274		Barry Feickert
42	Marfell, T S & J M	132 Booker Road	RD 2	Blenheim 7272		Terry Marfell
43	Ayson & Partners Limited	PO Box 256	Blenheim 7240			Vern Ayson
44	Grand Designs Limited	29 Rose Street	Blenheim 7201			Martin Ridgway
45	Wilson Martyn	C/O 27 Brooklyn Drive	Blenheim 7210			
46	Adams Land Nursery & P D & M Lloyd	138 Battys Road	Blenheim 7210			P D Lloyd
47	Robinson Developments Limited	C/O Planning Focus Limited	PO Box 911361	Auckland Mail Centre	Auckland 1142	Alistair White
48	Outer Limits Limited	PO Box 616	Blenheim 7240			Phil Robinson
49	Jenkins, R J & R	76 Hardings Road	RD 4	Blenheim 7274		

Participant Number	Name	Address	Address	Address	Address	Contact
50	Rose, Peter Wallis	161 Cravens Road	RD 3	Blenheim 7273		
51	Adcock Paul & Devir Nicki	37 Havelock Street	Renwick	Blenheim 7204		
52	Slape, Kelvin	3 Rousehill Street	Renwick	Blenheim 7204		
53	Lansdown, Sam	69 Gibsons Road	RD 3	Kaituna	Blenheim 7273	
54	Anderson, Bruce	60 Havelock Street	Renwick	Blenheim 7204		
55	Higgins, Mark & Katrina	861 Onamalutu Road	RD 5	Blenheim 7275		
56	Boon, D R & S A	99 Leslies Road	RD 1	Havelock 7178		
57	Bruckel, Paul	875 Waihopai Road	RD 6	Blenheim 7276		
58	Peace, Margaret	128 Blind Creek Road	RD 3	Blenheim 7273		
59	Ben Morven Partnership	Ben Morven	RD 2	Blenheim 7272		Kevin Hayes
60	Sherwood, Peter F	Las Fronteras	Wairau Valley	RD 1	Blenheim 7271	
61	Sherwood, Nancy	Las Fronteras	Wairau Valley	RD 1	Blenheim 7271	
62	O'Malley, Kaye	Windrush	427 SH 63	RD 1	Blenheim 7271	
63	Hadley, J A & J P	Rachel Reese Consulting Limited	PO Box 1474	Nelson 7040		Rachel Reese
64	Tu Jaes Trust	Rachel Reece Consulting Limited	PO Box 1474	Nelson 7040		Rachel Reese
65	Hadley Consultants-Civil & Structural Engineers	Rachel Reece Consulting Ltd	PO Box 1474	Nelson 7040		Rachel Reese
66	Hadley Reese Partnership	Rachel Reese Consulting Limited	PO Box 1474	Nelson 7040		Rachel Reese
67	Wharehunga Forestry	Rachel Reese Consulting Limited	PO Box 1474	Nelson 7040		Rachel Reese

Participant Number	Name	Address	Address	Address	Address	Contact
	(2004) Limited					
68	J A Hadley Family Trust	Rachel Reese Consulting Limited	PO Box 1474	Nelson 7040		Rachel Reese
69	Wharehunga Forestry Limited	Rachel Reese Consulting Limited	PO Box 1474	Nelson 7040		Rachel Reese
70	Wharehunga Trust	Rachel Reese Consulting Limited	PO Box 1474	Nelson 7040		Rachel Reese
71	Williams, Peter & Dianne	PO Box 625	Blenheim 7240			
72	Monk, Craig & Jo	1 Pattie Place	Blenheim 7201			
73	Stringer, Diana	1627 Waihopai Valley Road	RD 6	Blenheim 7276		
74	Mapp, L C & V L	Pine Valley	RD 5	Blenheim 7275		
75	White, S T & S	Te Rou Road	RD 5	Blenheim 7275		
76	Traffic Design Group	PO Box 30721	Lower Hutt 5040			Dave Petrie
77	Witherhills Vineyards Marlborough Limited	114 New Renwick Road	RD 2	Blenheim		John Marris
78	Blenheim Backpackers Collective	29 Park Terrace	Blenheim 7201			Rob Lawrence
79	Wilson, Ken	70 David Street	Blenheim 7201			
80	Hyson, Michael	195 Shandon Road	RD 6	Blenheim 7276		
81	Adcock, G & B V	45 Godfrey Road	RD 2	Blenheim 7272		
82	Adcock, Ian	45 Godfrey Road	RD 2	Blenheim 7272		
83	Chapman, Murray	Quaildale	RD 6	Blenheim 7276		
84	Weyerhaeuser	Private Bag 5	Richmond	Nelson 7050		Jenny Beale/

Participant Number	Name	Address	Address	Address	Address	Contact
	New Zealand Limited					Phil Madill
85	E D Townley Limited	C/O McFadden McMeeken Phillips	PO Box 656	Nelson 7040		E D Townley
86	La Plante, Steven	Te One	1679 Redwood Pass Road	RD 4	Blenheim 7274	
87	Evans, Geoffrey Ian T & Elizabeth Mary	Stronvar	RD 6	Blenheim 7276		Geoff Evans
88	Marlborough Roads	PO Box 1031	Blenheim 7240			Frank Porter
89	Blick, Hayden	1397 Waihopai Valley	RD 6	Blenheim 7276		
90	Blick, George	1397 Waihopai Valley	RD 6	Blenheim 7276		
91	Briggs, Fiona	135 Waihopai Valley	RD 6	Blenheim 7276		
92	Dawkins, C J	Pyramid	Waihopai Valley	RD 6	Blenheim 7276	
93	Dawkins, J C	Pyramid	Waihopai Valley	RD 6	Blenheim 7276	
94	Dawkins, David	Pyramid	Waihopai Valley	RD 6	Blenheim 7276	
95	Huddleston, Kim	Avondale Road	RD 6	Waihopai Valley	Blenheim 7276	
96	Hawkins, Dianne	Avondale Road	RD 6	Waihopai Valley	Blenheim 7276	
97	Huddleston, Paul	RD 6	Blenheim 7276			
98	Pilcher, S J	The Guardian	RD 6	Blenheim 7276		
99	Pilcher, S M	The Guardian	RD 6	Blenheim 7276		
100	Mason, B D	Avonlea Lodge	RD 6	Blenheim 7276		
101	Mason, J	Avonlea Lodge	RD 6	Blenheim 7276		

Participant Number	Name	Address	Address	Address	Address	Contact
102	Mason, Chris	Avonlea Lodge	RD 6	Blenheim 7276		
103	Chapman, M W	Quaildale	RD 6	Blenheim 7276		
104	Chapman, E J	Quaildale	RD 6	Blenheim 7276		
105	Chapman, R A	Quaildale	RD 6	Blenheim 7276		
106	Avery, K F	Camphill	RD 6	Blenheim		
107	Barriball, L R	The Teme	RD 6	Blenheim 7276		
108	Alexander ,M G	The Teme	RD 6	Blenheim 7276		
109	Prosser, Ron	Redwood	RD 6	Blenheim 7276		
110	Wadsworth, Melvyn	Redwood	RD 6	Blenheim 7276		
111	Rudd, L A	Avon Valley	RD 6	Blenheim 7276		
112	Rudd, K D	Summerlands	RD 6	Blenheim 7276		
113	Rudd, S G	Summerlands	RD 6	Blenheim 7276		
114	Rudd, A L	Summerlands	RD 6	Blenheim 7276		
115	Maasdam, Ruud	1734 Waihopai Valley Road	Blenheim 7276			
116	Vermaas, Dorien	1734 Waihopai Valley Road	Blenheim 7276			
117	Laugesen, Richard	1700 Waihopai Valley Road	Blenheim 7276			
118	Bissell, Ivor	1770 Weaihopai Valley Road	RD 6	Blenheim 7276		
119	Tucker , Sean	1619 Waihopai Valley Road	RD 6	Blenheim 7276		
120	Tucker, Jaequi	1619 Waihopai Valley Road	RD 6	Blenheim 7276		
121	Deans, Cory	1727 Waihopai Valley Road	Blenheim 7276			



Participant Number	Name	Address	Address	Address	Address	Contact
122	Butt,Jim	2547 Waihopai Valley Road	RD 6	Blenheim 7276		
123	Wright ,Ross	Banksia Cottage	RD 6	Blenheim 7276		
124	Rive ,Willie	Tordarroch	RD 6	Blenheim 7276		
125	Rive, Anne	Tordarroch	RD 6	Blenheim 7276		
126	Rive, G R	Tordarroch	RD 6	Blenheim 7276		
127	Shanks, A F	Benhopai	RD 6	Blenheim 7276		
128	Bevan, M A	Te Ra Whiti	RD 6	Blenheim 7276		
129	Gray, S J	Te Ra Whiti	RD 6	Blenheim 7276		
130	Coyle, M	2716 Waihopai Valley Road	Blenheim 7276			
131	Put, Lee	3582 Waihopai Valley Road	Blenheim 7276			
132	Lynskey, Ray	1505 Waihopai Valley Road	Blenheim 7276			
133	Henderson, Philip	683 Waihopai Valley Road	Blenheim 7276			
134	Henderson, Robyn	683 Waihopai Valley Road	Blenheim 7276			
135	Lawrence, Kay	42 Shandon Road	RD 6	Blenheim 7276		
136	Pope, D C	42 Shandon Road	RD 6	Blenheim 7276		
137	Higgs, P M	55 Shandon Road	Blenheim 7276			
138	Higgs,H P	55 Shandon Road	Blenheim 7276			
139	Higgs, N M	55 Shandon Road	RD 6	Blenheim 7276		
140	Currie, M K J	58 Shandon Road	RD 6	Blenheim 7276		
141	Currie, P M	58 Shandon Road	RD 6	Blenheim 7276		

Participant Number	Name	Address	Address	Address	Address	Contact
142	Anderson, Tim	120 Shandon Road	RD 6	Blenheim 7276		
143	Anderson, E A	120 Shandon Road	RD 6	Blenheim 7276		
144	Foley, John	145 Shandon Road	RD 6	Blenheim 7276		
145	Foley, Chris	145 Shandon Road	RD 6	Blenheim 7276		
146	Murphy, G	164 Shandon Road	RD 6	Blenheim 7276		
147	Murphy, Judith	164 Shandon Road	RD 6	Blenheim 7276		
148	Wall, Raewyn	162 Shandon Road	RD 6	Blenheim 7276		
149	Wall, John	162 Shandon Road	RD 6	Blenheim 7276		
150	Moore, Paula	202 Shandon Road	RD 6	Blenheim 7276		
151	Wallace, Russell	748 Waihopai Valley Road	Blenheim 7276			
152	Wallace, Rachael	748 Waihopai Valley Road	RD 6	Blenheim 7276		
153	Moore, Anthony	877 Waihopai Valley Road	RD 6	Blenheim 7276		
154	McCaig, Bernadette	877 Waihopai Valley Road	RD 6	Blenheim 7276		
155	Pope, Noel	1089 Waihopai Valley Road	RD 6	Blenheim 7276		
156	Chapman, Helen	Quaildale	1566 Waihopai Valley Road	RD 6	Blenheim 7276	
157	Hammond, Chris	279 West Coast Road	RD 1	Blenheim 7271		
158	Hammond, Murray	277 West Coast Road	RD 1	Blenheim 7271		
159	Hammond, Elaine	277 West Coast Road	RD 1	Blenheim 7271		
160	Hammond, Jeff	99 Waihopai Valley Road	RD 6	Blenheim 7276		

Participant Number	Name	Address	Address	Address	Address	Contact
161	Trolove, David	129 Waihopai Valley Road	RD 6	Blenheim 7276		
162	Trolove, Lucy	129 Waihopai Valley Road	RD 6	Blenheim 7276		
163	Ryan, Brendon	383 Waihopai Valley Road	RD 6	Blenheim 7276		
164	Ryan, Colette	383 Waihopai Valley Road	RD 6	Blenheim 7276		
165	Tapp, N M	450 Waihopai Valley Road	RD 6	Blenheim 7276		
166	Ratttray, P	470 Waihopai Valley Road	RD 6	Blenheim 7276		
167	Jones, C	630 Waihopai Valley Road	RD 6	Blenheim 7276		
168	Jones, G	630 Waihopai Valley Road	RD 6	Blenheim 7276		
169	Mitchell, D	661 Waihopai Valley Road	RD 6	Blenheim 7276		
170	Mitchell, S	661 Waihopai Valley Road	RD 6	Blenheim 7276		
171	Hickman, G	1095 Waihopai Valley Road	RD 6	Blenheim 7276		
172	Hickman, K	1095 Waihopai Valley Road	RD 6	Blenheim 7276		
173	Jackson, S	784 Waihopai Valley Road	RD 6	Blenheim 7276		
174	Jackson, D R	784 Waihopai Valley Road	RD 6	Blenheim 7276		
175	MacDonald, D B	780 Waihopai Valley Road	RD 6	Blenheim 7276		
176	Powell, Maureen	682 Waihopai Valley Road	RD 6	Blenheim 7276		
177	Powell, Tom	682 Waihopai Valley Road	RD 6	Blenheim 7276		
178	Mullen, Nicola	3992 Waihopai Valley Road	RD 6	Blenheim 7276		
179	Eade, John	710 Waihopai Valley Road	RD 6	Blenheim 7276		
180	Laurenson,	686 Waihopai	RD 6	Blenheim		

Participant Number	Name	Address	Address	Address	Address	Contact
	Jeremy	Valley Road		7276		
181	Laurenson, Rosemary	686 Waihopai Valley Road	RD 6	Blenheim 7276		
182	Blick, Brian	588 Waihopai Valley Road	RD 6	Blenheim 7276		
183	Blick, Sheryl	588 Waihopai Valley Road	D 6	Blenheim 7276		
184	Donovan, Patrick	PO Box 62	Renwick	Blenheim 7243		
185	Sorensen, Joan	78 Tyntesfield Road	RD 6	Blenheim 7276		
186	Sorensen, Graeme	78 Tyntesfield Road	RD 6	Blenheim 7276		
187	Ensor, Edward	485 Tyntesfield Road	RD 6	Blenheim 7276		
188	Ensor, Helen	485 Tyntesfield Road	RD 6	Blenheim 7276		
189	Fleming, Lisa	455 Tyntesfield Road	RD 6	Blenheim 7276		
190	Ensor, Ben	455 Tyntesfield Road	RD 6	Blenheim 7276		
191	Wadsworth, Trevor	558 Tyntesfield Road	RD 6	Blenheim 7276		
192	Wadsworth, Debbie	558 Tyntesfield Road	RD 6	Blenheim 7276		
193	Taylor, Wayne	376 Tyntesfield Road	RD 6	Blenheim 7276		
194	Taylor, Chantal	376 Tyntesfield Road	RD 6	Blenheim 7276		
195	Rodger, Rachel	338 Tyntesfield Road	RD 6	Blenheim 7276		
196	Rodger, Michael	338 Tyntesfield Road	RD 6	Blenheim 7276		
197	Newman, Bertha	293 Tyntesfield Road	RD 6	Blenheim 7276		
198	Newman, M C	Cowslip Valley	RD 6	Blenheim 7276		
199	Baldwin, Bruce	255 Tyntesfield Road	RD 6	Blenheim 7276		

Participant Number	Name	Address	Address	Address	Address	Contact
200	Baldwin, A J	255 Tyntesfield Road	RD 6	Blenheim 7276		
201	Russell L M	Mount Olympus	Waihopai Valley	RD 6	Blenheim 7276	
202	Goulter Annette	The Ruin	Waihopai Valley	RD 6	Blenheim 7276	
203	Dick Bruce	The Rock	RD 6	Blenheim 7276		
204	Dick Nola	The Rock	RD 6	Blenheim 7276		
205	Rowsell Steve	Blackrock	RD 6	Blenheim 7276		
206	Hull, Judy	Blackrock	RD 6	Blenheim 7276		
207	Cambridge, Michael	81 Parker Street	Blenheim 7201			
208	Thompson, Zoe	RD 6	Blenheim 7276			
209	Mackenzie, Alison	RD 6	Waihopai Downs	Blenheim 7276		
210	Mackenzie, Aiden	RD 6	Waihopai Downs	Blenheim 7276		
211	Mapp, Roland	Spray Point	RD 6	Blenheim 7276		
212	Evans, D K T	Stronvar	RD 6	Blenheim 7276		
213	Mapp, Jennifer	Spray Point	RD 6	Blenheim 7276		
214	J & R K de Castro Limited	Greenfields	Muller Road	Blenheim 7201		Stephen de Castro
215	Assets & Services Department Staff MDC	C/O PO Box 443	Blenheim 7240			Jon Cunliffe
216	Mason, Ralph Douglas	Avondale	RD 6	Blenheim 7276		
217	Stokes, Christopher Francis	C/O Gascoigne Wicks	PO Box 2	Blenheim 7240		Brian Fletcher

Participant Number	Name	Address	Address	Address	Address	Contact
218	Tyson, Tony	596 Tua Marina Track	RD 3	Blenheim 7273		
219	Sutherland, R D	C/O PO Box 751	Blenheim 7240			
220	Nicholls, K M & N P	C/O Survey Solutions NZ Limited	PO Box 189	Blenheim 7240		Perry Gilbert
221	Goodwin, T J & D I	Survey Solutions NZ Limited	PO Box 189	Blenheim 7240		Perry Gilbert
222	Bowen, D A W	C/O Survey Solutions NZ Limited	PO Box 189	Blenheim 7240		Perry Gilbert
223	Powell, Brian & F	67 A High Street	Renwick	Blenheim 7204		
224	Lindstrom, T G & Hegglun M A	35 Battys Road	Blenheim 7201			
225	Fitzgerald, Roger Myers	53 Fairbourne Drive	RD 2	Blenheim 7272		
226	Lindstrom, Clayton & Wendy	33 Battys Road	Blenheim 7201			
227	Stanton, Brian & Newport Sharon					
228	Newport, Trevor & Yvonne					
229	Department of Conservation	Nelson/Marlborough Conservancy	Private Bag 5	Nelson 7040		Joanna Gould
230	William Haugh Enterprises Limited	Palms Limited	PO Box 751	Blenheim 7240	Attn Ron Sutherland	Roger Jordan
231	Haymes, Graeme	PO Box 380	Blenheim 7240			
232	Gilbert Haymes & Associates Limited	PO Box 380	Blenheim 7240			Graeme Haymes/Tony Hawke
233	Gifford Allan	PO Box 4	Renwick	Blenheim		

Participant Number	Name	Address	Address	Address	Address	Contact
				7204		
234	Marris, John & Alison	Senior Resource Management Planner	Glasson Potts Fowler Limited	PO Box 13875	Christchurch 8031	Brent Pizzey
235	Tyrone Park Limited	Resource Management Group	PO Box 13792	Christchurch 8141		Katherine Snook
236	Barnet,, GJ & J S	132 Tua Marina Track	RD 3	Blenheim 7273		Gary Barnett
237	Bown, P G & B A	Te Rou	RD 5	Blenheim 7275		
238	PYG Limited	C/O Ayson & Partners Limited	PO Box 256	Blenheim 7240		Vern Ayson
239	Hawkesbury Farm Limited	334 Hawkesbury Road	RD 2	Blenheim 7272		R H Goulter
240	NZ Automobile Association Incorporated	PO Box 104	Blenheim 7240			Kelston Swete
241	Federated Farmers (Blenheim Branch)	1090 Rapaura Road	RD 3	Blenheim 7273		Alastair M Campbell
242	Veroe Ian Frank	51 Battys Road	Blenheim 7201			
243	Evans, Geoff	Stronvar	RD 6	Blenheim 7276		
244	Evans, E.M	Stronvar	RD 6	Blenheim 7276		