BEFORE INDEPENDENT HEARING COMMISSIONERS AT WAIKATO

IN THE MATTER OF

The Resource Management Act 1991 ("the Act")

<u>AND</u>

IN THE MATTER OF

Proposed Waikato District Plan - Village Zone

<u>AND</u>

Vineyard Road Properties Limited

Submitter

STATEMENT OF EVIDENCE OF JOHN ROWE ON BEHALF **OF VINEYARD ROAD PROPERTIES LIMITED**

DATED 25th November 2019



Introduction and Experience

- My Name is John William Stuart Rowe. I am a Licensed Cadastral Surveyor and Director of independent consultancy Tripp Andrews Surveyors Limited. I have over 10 years of Land Development relegated experience.
- 2. I hold Bachelor of Surveying (BSurv) degree from the University of Otago and I am a member of the New Zealand Institute of Surveyors.
- 3. My experience includes subdivision and land development, civil engineering design of utility services and vehicular access, resource consent preparation for subdivisions and representation from private perspectives. I specialise in Land Transfer subdivisions, both urban and rural, however mainly in the rural and rural residential sector and predominantly in the northern Waikato and southern Auckland jurisdictions.
- 4. I have designed numerous self serviced allotments throughout Waikato and Auckland in general accordance with the appropriate planning rules such as the operative Waikato District Plan, former Franklin District Plan and the Auckland Unitary Plan.
- 5. I am familiar with and experienced in addressing the resource management issues, district plan policy and regulatory tools that apply to the former Franklin District and surrounding areas.
- I appear on behalf of the submission numbers 626 (Vineyard Road Properties Limited). I confirm that the evidence I present is within my area of expertise and I am not aware of any material facts which might alter or detract from the opinions I express in respect of the appropriateness of planning mechanisms proposed by the Council.

Statement of Position

- 7. In recent years, WDC has rightfully placed significant emphasis on the protection of versatile soils or land that can be used for rural productive activities. Vineyard Road and its surrounds has already been rezoned for more intensive styled residential development, it is my opinion that the most efficient use of that land is smaller sized allotments that maximise yield, whilst maintaining the character of the surrounding environment through appropriate development controls.
- 8. The proposed district plan has zoned Vineyard Road and its surrounds Countryside Living Zone (CLZ) with minimum lot sizes of 5000m² or half a hectare. From a design perspective, this larger sized allotment is more appropriate on more steeper or undulating terrain where appropriate building sites are more dispersed or restricted.
- 9. Factors including servicing, infrastructure and accessibility constraints and, in some cases their sensitive character, growth needs to be managed accordingly in these areas of the district. On flatter or easier terrain such as Vineyard Road that adjoins residential zoned land in Te Kawhata, these factors

lends itself to more intensive self – serviced development. The aim is to find the right balance in subdivision restrictions which is efficient use of land yet still protects the local rural environment, I believe that 2000m² sized sections achieve this aim.

- Diagram A illustrates a 2000m² notional lot design with the notified CLZ and VZ development controls shown, including yards and building platforms. The diagram is to illustrate that a 2000m² sized section is an appropriate and practicable area to accommodate a larger footprint dwelling structure more commonly found outside of the more urbanised areas, vehicular access and manoeuvring, effluent and stormwater disposal and general curtilage area, whilst respecting the proposed building development controls.
- 11. The notified Building Coverage for CLZ is 10% or 300m² and the minimum building setbacks is 7.5m from road boundaries and 12m from side and rear boundaries, these restrictions are shown as green on Diagram A. The size of the building platform under the CLZ rules should also have an area of 1000m² which I believe is unnecessarily big when considering the actual likely size of any new dwelling on any given allotment.
- Diagram A confirms that a 300m² sized building footprint can still comfortably fit on a 2000m² sized lot, whilst respecting the proposed building setbacks for the CLZ rules which allow for 5000m² sized lots. In fact there is over 500m² of available building space exclusive of the side yards.
- 13. This confirms that what is proposed by Vineyard Road Properties Limited is consistent or no different to what could be expected under the CLZ rules in this area.
- 14. Although there will be a slightly higher density of houses under the proposed 2000m² sized allotments compared to 5000m² sized allotments, the likely spaciousness between buildings on adjoining sites under the CLZ rules could still be achieved with the right development controls which will help maintain the open space rural character of the area.
- 15. For onsite effluent disposal, Wastewater servicing for new development or subdivisions should comply with AS/NZS 1547:2012. Setback requirements are 1.5m from property boundaries and at least 3m from buildings or houses. By respecting the CLZ building setbacks for a 2000m² sized allotment as a worst case scenario, there would still be over 1,100m² of vacant space available for effluent disposal. Most modern disposal systems would only require approximately half of this available space.
- 16. The notified Building Coverage for VZ is 20% for un-serviced sites and minimum building setbacks are 3m from road boundaries and 1.5m from side and rear boundaries. The building platform must be either a circle with a diameter of at least 18m exclusive of yards or a rectangle of at least 200m² with a minimum dimension of 12m exclusive of yards, these restrictions are shown as red on Diagram A.
- Diagram A confirms that a 200m² sized building footprint or 18m diameter circle can comfortably fit on a 2000m² sized lot whilst respecting the proposed building setbacks for the VZ rules which allow

for 3000m² sized allotments. In fact there is over 1,680m² of available building space exclusive of the side yards which confirms that what is proposed by VRPL is consistent or no different to what could be expected under the VZ rules for this area. At a 2000m² sized section, 400m² of impervious area (20% coverage) is also certainly workable for maximum coverage.

- Also attached is two schematic subdivision plans showing bulk and location for 2000m² sized allotments versus 3000m² allotments. Both subdivision layouts are generally similar in design and will look much the same 'on the ground' to the local residents, however the 2000m² sized lots will achieve a higher yield and result in a more efficient use of the land which is already zoned for more intensive development.
- 19. The 2000m² sized lot layout is still keeping with the landscape qualities and will not exacerbate any physical limitations such as land instability and will still result in sufficient setbacks and open space to maintain and complement the rural character of the area.
- 20. Appropriate restrictions on the maximum impervious area on a site in order to manage the amount of stormwater runoff generated by a development and ensure that adverse effects on water quality, quantity and amenity values are avoided or mitigated can still be achieved and is encouraged.
- Subdivision rules need to follow the current market trends or there is no incentive for developers to subdivide and housing supply is restricted and neglected.
- In recent years and through working on numerous subdivisions in this area, we have noticed a greater market preference for smaller sized lifestyle blocks that are easier to maintain and that are less expensive to purchase. Together with the increase in building costs in NZ, the market is being forced to downscale their expectations in total land area to build their desired dwelling structure. We are constantly being advised by our clients to cater for this demand in our subdivision lot layouts.
- Some of our clients that are experienced with developing land are requesting us to design smaller lots more frequently because the larger sized lots on previous subdivisions are much harder to sell and there is too much wasted land.

Signed by John Rowe – Licensed Cadastral Surveyor, for and on behalf of Vineyard Road Properties Ltd

Dated 25 November 2019

BEFORE INDEPENDENT HEARING COMMISSIONERS AT WAIKATO

IN THE MATTER OF

The Resource Management Act 1991 ("the Act")

AND

IN THE MATTER OF

Proposed Waikato District Plan - Village Zone

AND

Vineyard Road Properties Limited

Submitter

STATEMENT OF EVIDENCE OF ADAM MARSH ON BEHALF OF VINEYARD ROAD PROPERTIES LIMITED

DATED 25th November 2019

- 1. We would like to take this opportunity to introduce ourselves as the owners of Vineyard Road Limited. Our names are Adam Marsh, Carol McColl, Steve and Jan Godley.
- 2. Over the past nine plus years we have undertaken several residential developments in the area.
 - a. Clark Road, Ngaruawahia 4 Lots
 - b. Vineyard Rd, Te Kauwhata Stage 1 / 38 Lots
 - c. Vineyard Rd, Te Kauwhata Stage 2 / 18 Lots
- 3. We also own Vineyard Rd, Te Kauwahta Stage 3 which has an area of 7.1203ha. This area has had part of the development process completed but for all intense purposes it is basically a greenfield situation.
- 4. Prospective buyers are overwhelmed and impressed with the rural outlook however the large lot size has often been a negative point and creates push back from the purchases.
- The sizing of 5,000m2 is not practical for grazing or small farming situations and is also a burden for people to mow and maintain. The resizing to the 2000m2 area, offers a large manageable site while still accomplishing the feel and outlook of a rural site.
- 6. Due to a reduction in lot size there would likely be a reduction in price which would be attractive to prospective purchases.
- 7. In conclusion we continually have the question put to us can the lot size be reduced, where we must unfortunately explain the zoning restrictions and that our hands are tied. Consequently, it has resulted in many potential purchases going to other areas to achieve their desired 2000m2 lot area.

Regards;

Vineyard Road Limited

Adam Marsh (Director)

Steve Godley (Director)

SUBMISSON FORM

To WAIKATO DISTRICT COUNCIL 1. Name of submitter: VINEYARD ROAD PROPERTIES LIMITED 2. This is a submission on the WAIKATO DISTRICT COUNCIL PROPOSED DISTRICT PLAN 2018 3. We could **NOT** gain an advantage in trade competition through this submission. 4. The specific provisions of the Proposed District Plan that my submission relates to are: (a) The Country Living Zone ('CLZ") provisions (Chapter 23); and (b) The Village Zone ("VE") provisions (Chapter 24); and (c) Map 14.1 of the Proposed District Plan; and (d) Any consequential provisions of the Proposed District Plan to give effect to our submission. 5. Our submission relates to the properties marked on the Attached Map, being generally shown as: (a) Those properties on the eastern side of Vineyard Road from 4 to 122 Vineyard Road; and

(b) Those properties on the western side of Vineyard Road from 186 Wayside Road to 122

Vineyard Road.

6. Our submission OPPOSSES:

- (a) The CLZ zoning over the above properties; and
- (b) The minimum net size area of 5000m² (23.4.2 (a)) where it applies under that zoning to these properties; and
- (c) The minimum net size area of 3000m² (24.4.1 (a)) in the VE.

7. Our submission **SUPPORTS**:

- (a) the Restricted Discretionary status of General Subdivision in the CLZ and VE zones; and
- (b) The matters for discretion of those.

8. The reasons for our submission are:

- 8.1 In its current form, the Proposed District Plan fails to provide an appropriate, and efficient opportunity, for rural-residential lifestyle development in a manner that best utilises this land resource, and reduces pressure of subdivision within the rural areas.
- 8.2 The CLZ provides for an inefficient rural residential living opportunity because at a minimum lot size of 5000m², the lots created are too small to be productive or grazed, yet they are too big to be easily managed as lifestyle properties. A smaller lot size of 2000m² creates a rural-residential character, of open space, but at the same time can be planted, fenced, mowed and maintained easily. It achieves a rural setting.
- 8.3 The subdivision opportunity for these properties, provided under the proposed CLZ, with a minimum net site area of 5000m² (23.4.2, (a)) is an inefficient use of land, that is not productive, and which is suitable for a more intensive, rural-residential lifestyle opportunity. Thus:

- (a) A more intensive subdivision opportunity is required, and justified to make the most efficient use of the land resource in a sustainable way; and
- (b) A smaller site size of 2000m² would provide that opportunity in an appropriately managed way.
- 8.4 It is thought that the VZ more appropriately provides for that efficient subdivision opportunity of these properties, although it could equally be achieved by a relaxation of the minimum net site area whatever zone were applied.
- 8.5 However, the minimum net site area in the VZ at 3000m² is inefficient because even at 2000m² on site servicing is achievable.
- 8.6 With a smaller lot size of, say 2000m², on site servicing for water and wastewater is possible.
- 8.7 With a smaller lot size of, say, 2000m² an appropriate level of amenity is achieved, yet at the same time there is a lower intensity of development, and a rural outlook and character.
- 8.8 These properties on Vineyard Road exhibit a compromised, and fragmented rural character, so that use of the land for rural residential subdivision will not compromise productive potential, and will in fact, be the best utilisation of the land resource.
- 8.9 Changing this zone from CLZ to VZ would be giving effect to a higher order policy document in the hierarchy of the Resource Management Act 1991 documents, namely, the National Policy Statement -Urban Development Capacity (NPS-UDC) 2016, in which the Waikato District Council (WDC) has been identified as a highgrowth urban area
- 8.10 Such identification requires the WDC to give effect to all the Objectives listed in the NPS-UDC plus, in particular policies:

PB1-PB7

PC1-PC4

PD1-PD2

PC5-PC14

PD3-PD4

- 8.11 The NPS-UDC 2016 has been used to justify the VZ in Te Kowhai and Tuakau in the s32 Report written by Council when the Proposed District Plan was notified on 18 July 2018. In Tuakau some CLZ has been changed to VZ so to apply the same rationale to Te Kauwhata is not setting a precedent and could be viewed by the community as being 'fair' and consistent across the district.
- 8.12 The NPS-UDC 2016 requires in objective OA2 ...to provide choices that will meet the needs of people and their communities... short, medium, and long term...' Again, to change from CLZ to VZ would be giving effect to that objective.
- 8.13 The Future Proof "Planning for Growth" 2017 document, places emphasis on anchoring settlement patterns in key planning documents such as the Proposed District Plan (PDP).
- 8.14 The Future Proof strategy in 1.12.1, page 32, ...aims to achieve a more compact and concentrated urban form overtime...This change is fully complimentary to that goal.
- 8.15 The Operative Waikato Regional Policy Statement (WRPS) has a focus on residential growth being consolidated, sustainable, coordinated with infrastructure, focused on existing urban areas and provide for a range of house options (choice). Te Kauwhata is much bigger and has better established transport links, educational facilities, play grounds, and shopping precinct than Te Kowhai so could easily absorb the increase of density of this area to VZ rather than CLZ.
- 8.16 Te Kauwhata is recognised in 1.4.1.2 of the PDP as being important for the Auckland 'spill over' especially given the full diamond interchange that currently exists to service Te Kauwhata on the Waikato Expressway.

8.17 The change to VZ will not increase any loss of 'productive rural land' as it is already zoned CLZ and in effect is a more effective and efficient use of land by increasing the density of households where the WDC target id 10-12 households per ha in the Future Proof 2017 Strategy. The provision of infrastructure and amenity facilities is more affordable when there is a greater critical mass of ratepayers to contribute.

The Section 32 Analysis

- 8.18 It is unclear from the s32 Analysis what the criteria for selection of the CLZ or VE zoning are.
- 8.19 On one hand, the CLZ is said to predominately enable a residential development with a less dense character, low intensity development and rural outlook, than in comparison to urban zone, yet on the other, the VE is intended to provide a wide range of living opportunities; of rural lifestyle.
- 8.20 The objective of subdivision, use and development in the CLZ zone (5.6.1) that "maintains and enhances the character and amenity values of the zone", is circular, because the values that are strived for, are not set out.
- 8.21 There is no justification, or rationale given for the 5000m² lot size in the CLE; it is neither rural, nor rural-residential.
- 8.22 The VZ should not be dependent on reticulated Council services. On site servicing should be provided for and it is possible with a lot size of 2000m². This has not been considered in the s32 Report.
- 8.23 Equally, open space, rural views, and landscaped areas between houses can be achieved with a minimum lot size of 2000m², and sufficient consideration of design and servicing (as a matter of discretion) at time of subdivision consent application. This has not been considered in the s32 Report.

9. We seek the following decision from the local authority:

(a) That the subject properties be rezoned to VZ; and

- (b) That the minimum net site area for general subdivision in the VZ be reduced to 2000m² whether or not the lots are publicly reticulated; and /or
- (c) Such other relief as may be necessary to give effect to the concerns raised in this submission.

10. We do wish to be heard in support of our submission.



Signed by Julian Dawson - Barrister, for and on behalf of Vineyard Road Properties Ltd

Dated 9th October 2018

The address for service of the submitter is:

c/ Mr Julian Dawson – Barrister

21 Norfolk Street, Regent, Whangarei 0140

Post: PO Box 531, Whangarei 0140

Phone: (0274) 200 223

Email: julian@rmalawyer.co.nz

	First Name: JULIAN	Last Name: * DAWSON
	Organisation: BARRISTER	
	On behalf of: VINEYARD ROAD PROPERTIES LIMITED	
	Postal Address:	
	PO Box 531	
	Suburb:	
	City:	
	Whangarei	
	Country:	
	New Zealand	÷
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	JULIAN@RMALAWYER.CO.NZ	
1	Prefered method of contact	
e	Email	C Postal
	Daytime Phone:	
,	Mobile:	
i	0274 200 223	
	Would you like to present your submission i	in person at a hearing?
ر د	Yes I do NOT wish to speak in support of my	submission and ask that the following submission be fully considered
	, , , ,	3 · · · · · · , · · · · · · · · · · · ·
	Additional requirements for hearing:	
	Consultation Document Submissions	
		n Letford (43 Malcolm Street, Riverlea, Hamilton, New Zealand,
	3216)	
1	Original Point: #276.11 23.4.2 General Su	bdivision
	Support Oppose	

Reasons for my support or opposition are:

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Reduction in the minimum lot size is supported so long as a distinction between the CLZ and Village Zone is achieved. The distinction between the two zones is unclear in the Proposed District Plan.

I seek that the whole (or part) of the submission be allowed (or disallowed) for the details below

Allow

Disallow

in part.

Original Submitter: #489 Ann-Maree Gladding (PO Box 28-750, Remuera, Auckland, New Zealand, 1541) Original Point: #489.18 23.4.2 General Subdivision

Support

Oppose

Reasons for my support or opposition are:

Reduction in the minimum lot size is supported so long as a distinction between the CLZ and Village Zone is achieved. The distinction between the two zones is unclear in the Proposed District Plan.

I seek that the whole (or part) of the submission be allowed (or disallowed) for the details below

Allow

Disallow

in part

Original Submitter: #551 Dinah Robcke (859 Waingaro Road, Glen Massey, New Zealand)

Original Point: #551.2 23.4.2 General Subdivision

Support

Oppose

Reasons for my support or opposition are:

In part. Reduction in the minimum lot size is supported so long as a distinction between the CLZ and Village Zone is achieved. The distinction between the two zones is unclear in the Proposed District Plan. However, average lot size is opposed because it distorts the subdivision outcome.

I seek that the whole (or part) of the submission be allowed (or disallowed) for the details below

• Allow

Disallow

in part

Original Submitter: #564 Mark Chrisp (25A Riverglade Drive, RD3, Hamilton, New Zealand, 3283) **Original Point:** #564.1 23.4.2 General Subdivision

Support

Coppose

Reasons for my support or opposition are:

Reduction in the minimum lot size is supported so long as a distinction between the CLZ and Village Zone is achieved. The distinction between the two zones is unclear in the Proposed District Plan.

I seek that the whole (or part) of the submission be allowed (or disallowed) for the details below

♠ Allow

Disallow

Original Submitter: #662 Blue Wallace Surveyors Ltd (c/- Tim Lester, PO Box 38, Hamilton, New Zealand, 3240)

Original Point: #662.28 23.4.2 General Subdivision

Support

Oppose

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Reasons for my support or opposition are:

Reduction in the minimum lot size is supported so long as a distinction between the CLZ and Village Zone is achieved. The distinction between the two zones is unclear in the Proposed District Plan.

I seek that the whole (or part) of the submission be allowed (or disallowed) for the details below

Allow ?

Disallow

in part

Original Submitter: #695 Sharp Planning Solutions Ltd (142 River Road, Hamilton East, Hamilton, New Zealand, 3216)

Original Point: #695.121 23.4.2 General Subdivision

Support

Oppose

Reasons for my support or opposition are:

In part. Reduction in the minimum lot size is supported so long as a distinction between the CLZ and Village Zone is achieved. The distinction between the two zones is unclear in the Proposed District Plan. Not necessary that potable water be reticulated.

I seek that the whole (or part) of the submission be allowed (or disallowed) for the details below

• Allow

Disallow

in part.

Original Submitter: #746 The Surveying Company (c/- Leigh Shaw, PO Box 466, Pukekohe, New Zealand,

Original Point: #746.120 23.4.2 General Subdivision

Support

Oppose

Reasons for my support or opposition are:

Reduction in the minimum lot size is supported so long as a distinction between the CLZ and Village Zone is achieved. The distinction between the two zones is unclear in the Proposed District Plan.

I seek that the whole (or part) of the submission be allowed (or disallowed) for the details below

Allow

Disallow

in part

Original Submitter: #782 Jack Macdonald (Private Bag 28-750, Remuera, Auckland, New Zealand, 1541) Original Point: #782.18 23.4.2 General Subdivision

Support

Oppose

Reasons for my support or opposition are:

Reduction in the minimum lot size is supported so long as a distinction between the CLZ and Village Zone is achieved. The distinction between the two zones is unclear in the Proposed District Plan.

I seek that the whole (or part) of the submission be allowed (or disallowed) for the details below

Allow

Disallow

in part

Original Submitter: #838 Madsen Lawrie Consultants (c/- Ben Young, PO Box 177, Pukekohe, New Zealand, 2340)

Original Point: #838.17 23.4.2 General Subdivision	
© Support © Oppose	
Reasons for my support or opposition are: Reduction in the minimum lot size is supported so long as a distinction between the CLZ and Village Zone i achieved. The distinction between the two zones is unclear in the Proposed District Plan.	5
I seek that the whole (or part) of the submission be allowed (or disallowed) for the details below Allow C Disallow in part.	
Original Submitter: #922 John Rowe (Private Bag 28-750, Remuera , Auckland, New Zealand, 1541) Original Point: #922.19 23.4.2 General Subdivision	
© Support C Oppose	
Reasons for my support or opposition are: Reduction in the minimum lot size is supported so long as a distinction between the CLZ and Village Zone is achieved. The distinction between the two zones is unclear in the Proposed District Plan.	s
I seek that the whole (or part) of the submission be allowed (or disallowed) for the details below Allow Disallow in part.	
Original Submitter: #345 Brent Trail (P O Box 852, Tauranga, New Zealand, 3112) Original Point: #345.19 23.4.2 General Subdivision	
© Support © Oppose	
Reasons for my support or opposition are: Reduction in the minimum lot size is supported so long as a distinction between the CLZ and Village Zone achieved. The distinction between the two zones is unclear in the Proposed District Plan.	s
I seek that the whole (or part) of the submission be allowed (or disallowed) for the details below follow Disallow	
in part	
Original Submitter: #746 The Surveying Company (c/- Leigh Shaw, PO Box 466, Pukekohe, New Zealar 2340) Original Point: #746.123 Chapter 24: Village Zone	d,
© Support Oppose	
Reasons for my support or opposition are: A Village Zone is appropriate.	
I seek that the whole (or part) of the submission be allowed (or disallowed) for the details below Allow C Disallow	

Original Submitter: #923 Waikato District Health Board (c/- Dr Richard Wall, Private Bag 3200, Hamilton,

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New Zealand, 3240)

Original Point: #923.2 Chapter 24: Village Zone

Support

Oppose

Reasons for my support or opposition are:

Agree. The purpose and outcome of each zone needs to be clear, with a distinction between them.

I seek that the whole (or part) of the submission be allowed (or disallowed) for the details below

• Allow

Disallow

Original Submitter: #296 Richard Falconer (PO Box 5028, Frankton, Hamilton, New Zealand, 3242) Original Point: #296.6 24.4.1 Subdivision – General

Support

Oppose

Reasons for my support or opposition are:

The submission appears to relate to Te Kowhai only. However, a minimum size of 3,000m2 is not appropriate in the village zone because it is an inefficient use of resources and does not achieve the necessary characters.

I seek that the whole (or part) of the submission be allowed (or disallowed) for the details below

Allow

• Disallow

Original Submitter: #345 Brent Trail (P O Box 852, Tauranga, New Zealand, 3112)

Original Point: #345.23 24.4.1 Subdivision - General

Support

Oppose

Reasons for my support or opposition are:

In part. Site size should be 2000m2, though rationale is supported.

I seek that the whole (or part) of the submission be allowed (or disallowed) for the details below

• Allow

Disallow

in part.

Original Submitter: #436 Gerard Willis (36B Jellicoe Road, Pukekohe, New Zealand, 2120)

Original Point: #436.1 24.4.1 Subdivision – General

Support

Oppose

Reasons for my support or opposition are:

Reduction in the minimum lot size is supported so long as a distinction between the CLZ and Village Zone is achieved. The distinction between the two zones is unclear in the Proposed District Plan.

I seek that the whole (or part) of the submission be allowed (or disallowed) for the details below

• Allow

Disallow

Original Submitter: #746 The Surveying Company (c/- Leigh Shaw, PO Box 466, Pukekohe, New Zealand, 2340)

Original Point: #746.131 24.4.1 Subdivision – General

where public reticula	d rationale supported. 2,000m2 is appropriate, and achievable as a minimum lot size tion not available.
Allow Disallow	le (or part) of the submission be allowed (or disallowed) for the details below in lot size where public reticulation available.
Zealand, 3244)	: #943 McCracken Surveys Limited (c/- Dave McCracken , PO Box 19182, Hamilton, Ne 3.57 24.4.1 Subdivision – General
• Support • Oppose	
Reasons for my su	pport or opposition are:
I seek that the who Allow Disallow	ele (or part) of the submission be allowed (or disallowed) for the details below
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• Allow	

SupportOppose