

Proposed Thames Coromandel District Plan Hearings

The Proposed District Plan Hearings Panel

Hearings: 10 to 12 March 2015, Definitions

Submitter: K Vernon

Evidence

Submissions

1. I have made both primary and further submissions on the subject of Definitions.

Building Definition - structure and dish exclusions

2. My submissions address problems arising from various exclusions (exemptions) to the definition of Building.
3. The issue is that any structure excluded from the definition is not subject to the height, height in relation to boundary (daylight control) or yard or coverage provisions of the Plan because these controls only apply to buildings. That is, the exempt components are not subject to important controls that protect zone amenity.
4. It is, therefore, important to ensure that such exclusions are limited, clearly defined, and adequately constrained to avoid the purpose of the Height and HRB and Yard provisions being negated.
5. Two exclusions are of particular concern
 - 5.1 Firstly
“Structure no greater than 0.3m wide (maximum horizontal dimension), and no higher than an additional one third of the maximum permitted Height or HRB standard in the applicable rule.”
 - 5.2 and secondly
“Electromagnetic dish (e.g. for communications, TV).”
6. The first of these exclusions would allow structures such as poles of 300mm (1foot) diameter to extend up to 10.66 metres in a normal 8 metre zone. That is, 2.66 metres above the maximum height, essentially another storey.
7. There is no restriction on the number of such structures allowed per site.
8. Further there is no restriction on whether the structures are attached to a dwelling or free standing.
9. When exemptions of this type are put in place consideration must be given to the maximum non-compliance that they will permit and how people may use (or misuse) these.

Proposed Thames Coromandel District Plan Hearings

10. For instance in a normal 8m residential zones such as Coastal Living this provision would allow a row of freestanding flag poles spaced say 1m apart each 300mm (1 foot) in diameter and 10.66m high, or a similar arrangement of 10.66m light poles, or a line of roof mounted flag poles extending another storey above the highest permitted roof line, together with any number of flues, vent pipes, spires (of 300mm diameter) extending up to the same height, as well as one structure 2m wide extending up to 1.5m above the height control. Consider the impact such structures would have on views and neighbour amenity.
11. These combinations may seem unlikely but are allowed under the Proposed Plan and show the risk involved when exemptions are loosely defined.
12. Also, under the Amateur Radio Configuration (ARC) rule the Proposed Plan contends that antenna / aerial structures would have some exemption if individual components had a horizontal dimension of less than 300mm. But these configurations can consist of high stayed poles with horizontal aerial wires strung between them and other combinations of masts, wires and antennas. Taken as a whole these configurations comprise significant structures. If these can rely on the building definition exclusion and extend up to 10.66 metres high in an 8m zone as of right there is potential for serious visual and other adverse impacts on neighbours.
13. This is not consistent with Objective 4 in Section 19.3 Utilities that states “Amateur radio configurations are provided for where they do not have adverse effects on the character and amenity values of residential and rural areas.”
14. The Amateur Radio Configuration provision is one aspect of the Plan that will require amendment in accordance with the consequential “necessary” and “appropriate” change requirements of the relief sought by my submissions. Amateur Radio Configuration is a defined entity and structures combining masts, wires and aerials to form a configuration should be considered as an entity (single structure) and not on a component by component basis. The note included with the ARC rule is in my view misleading. Also, to ensure compliance with objective 4 of section 19.3 the activity should be classified as Restricted Discretionary in residential zones to allow adverse effects to be assessed on a case by case basis (this is the approach adopted in the Proposed Auckland Unitary Plan).
15. The second exemption is for electromagnetic (satellite) dish. It is not unusual to provide an exemption for a satellite dish but it is normal to stipulate a maximum size. In the Proposed Auckland Unitary Plan for instance it is a maximum diameter of 1 metre. I think it prudent to go further than this and stipulate the degree of height infringement allowed (1 metre) and the number of dishes per site that can infringe (one).
16. The Proposed TCDP however has no restrictions at all. A dish of 20 metre diameter for instance would comply even if it infringed the height envelope by say 10 metres, and there could be any number of these. This may be a somewhat extreme example but it highlights the flaws in the proposed provisions.

Proposed Thames Coromandel District Plan Hearings

17. The Planner seems to have faith that satellite dishes are getting smaller but this may prove to be misplaced. With increasing interest in the C band for instances larger dishes up to 2.4m diameter will be more common, and multiple LNB arrangements to track more than one satellite require a larger dish.
18. Also the Planner's contention that the structure exemption involves "thin" items seems to overlook the fact that we are talking about structure 300mm (one foot across). This is not "thin" it is actually quite substantial particularly when there is no limit on the number per site.
19. Further, the Planner's view that caps on the exemptions "would not solve any resource management issue in the District" (Council report paragraph 31) is presumably based on experience under the Operative Plan.
20. But a review of the Operative Plan definitions reveals that the equivalent structure exemptions only apply "within the foot print of the building" (in the definition of Height). Free standing structures such as poles and masts are not excluded and there is no specific exemption for satellite dish antennas.
21. Experience under the Operative Plan therefore is not a good indicator of what to expect from the more relaxed provisions included in the Proposed Plan.
22. In my view the Planner's approach is unwise and puts residents at unnecessary risk of serious adverse effects to their property. This can be avoided with some very simple amendments to the definitions.
23. The key aspects of these amendments are no exemptions for free standing structure (outside the foot print of a dwelling) and limited specific exemptions for slender items such as vent pipes incorporated into a dwelling, and a limited restricted exemption for a satellite dish.
24. These amendments will ensure the purpose of these exemptions (to ensure minor slender projections essential to the function of a dwelling such as vent pipes do not unduly constrain the overall height envelope) is achieved without opening up the possibility of excessive infringement with unwanted and unnecessary adverse effects
25. The Planner notes that I made a number of submissions on this subject suggesting various changes. These represent a developing view on how to best address the issue. I actually made a further submission to summarise and clarify the reasoning and final relief sought. A copy of this further submission is included in Attachment 1 to this evidence.
26. **The relief sought in the final primary submission (see Attachment 2) is as follows:**
 - (a) **Amend the definition of Building in Section 3 as follows:**
Delete the exclusion "Structure no greater than 0.3m wide (maximum horizontal dimension), and no higher than an additional one third of the maximum permitted Height or HRB standard in the applicable rule"

Proposed Thames Coromandel District Plan Hearings

Consider introducing more specific limited exclusions (in either the definition of building or the definition of Height and HRB or zone rules) for items such as vent pipes incorporated into a building qualifying as a dwelling.

For the exclusion “Electromagnetic dish (e.g. for communications, TV).” amend to read as follows

“Electromagnetic dish (e.g. for communications, TV). Not more than one dish will be excluded per site. The dish major access dimension must be no more than 0.9m, and the dish including any support structure must not extend more than 1m vertical above the Height and HRB standard in the applicable rule.”

(b) Make such other amendments to the Proposed Thames Coromandel District Plan as are necessary to fully implement, or are appropriate as a consequence of, the primary relief sought.

(c) Failing acceptance of the above requirements reject the Proposed Thames Coromandel District Plan in its entirety.

27. This relief removes the troublesome general 300mm wide structure exclusion and would replace it with a set of limited targeted exclusions for dwellings to cover items such as vent pipes.
28. It would remove any exemptions for other free standing structures such as masts and light poles. This brings the Proposed Plan back into align with the established Operative Plan provisions.
29. Consequential changes would be required in the Amateur Radio Configuration rule and elsewhere in the Proposed Plan.
30. Satellite dishes would be subject to some sensible controls similar to those found in other Plans.
31. I initially thought that changing the word “electromagnetic” to “telecommunication” acceptable but I am now of the view that wording along the lines “Satellite Receiver Dish” would be more appropriate for the type of passive device used by the general public. The word “telecommunication” has Utility company connotations about it.

Building definition – small enclosed structure exemption

32. The Planner has suggested various amendments to bring the Building definition enclosed structure exemption into closer align with the building consent exemption (based on Council’s submission to its own Proposed Plan) but has continued to be somewhat selective about this.
33. For instance the requirement “Not used for sleeping” has been included but the Building Act adds the qualification - unless used in conjunction with a dwelling.

Proposed Thames Coromandel District Plan Hearings

34. The point I made in my further submission was that if it is acceptable for Council to be selective on some aspects then it can be selective about height also. That is, there is no compulsion to increase the height from 2.5m to 3.5m.

Park Over Properties

35. The motor caravan association has suggested a new activity for “Park Over Properties” and the Planner has gone down a completely different route recommending changes to the campground rule in zones such as Coastal Living.
36. In the proposed new Section 41 Rule 2A Campground the requirement 1(c) “The site is registered with the New Zealand Motor Caravan Association” seems to be using the Plan to promote the interests of a private organisation. In my view this is wrong in principle. This provision should be either deleted or changed to “registered with TCDC”.
37. There should be a maximum duration of stay included to prevent long term living, say 5 nights.
38. Also, in the proposed new Section 41 Rule 2A clause 2 Council has not indicated how it will restrict its discretion. To correct this add “The Council restricts its discretion to matters 2 to 11 in Table 6 at the end of Section 41”. This brings Rule 2A 2 into align with the way Campground was treated under Rule 18.
39. In fact on reflection the controls round the Campground and Commercial Recreation / Event Facility activities do not look adequate particularly in sensitive zones such as Coastal Living, and now that Council has decided to rewrite these rules it is appropriate to have another look.
40. Currently the only controls seem to be for vehicle parking and manoeuvring, and compliance with general building controls. I would have thought there are issues such as suitability of site, numbers of people, facilities, type of activity, and protection of residential amenity to be considered also. The Panel should require Council Planners to report back on this issue.
41. The same amendments will be required in other zones affected by Council’s approach.

Conclusions

42. Some of the Building definition exemptions are poorly defined and inadequately constrained.
43. These allow excessive infringement of the height control envelope and yard provisions exposing property owners to unnecessary risk of adverse effects on amenity.

Proposed Thames Coromandel District Plan Hearings

44. I have proposed amendments that will address this issue. Broadly they are:

Delete the exclusion “Structure no greater than 0.3m wide (maximum horizontal dimension), and no higher than an additional one third of the maximum permitted Height or HRB standard in the applicable rule”

Introduce more specific limited exclusions for items such as vent pipes incorporated into a building qualifying as a dwelling.

Amend the exclusion “Electromagnetic dish (e.g. for communications, TV)” to read as follows - “Not more than one dish will be excluded per site. The dish major access dimension must be no more than 0.9m, and the dish including any support structure must not extend more than 1m vertical above the Height and HRB standard in the applicable rule.”

45. A number of consequential amendments are required in accordance with the “necessary” and “appropriate” requirements of the relief sought.
46. In particular the Amateur Radio Configuration provisions require change. The reference to the 300mm wide structure exclusion will require deletion. Also, in residential areas this activity should be moved to the Restricted Discretionary category and made subject to assessment on - location, physical size (design, scale and height), adverse impacts on amenity and character including visual impacts, and the avoidance of other adverse effects (including health and safety and EMR related issues). The assessment tables should be amended if necessary to allow for this.
47. This is necessary to ensure compliance with Objective 4 of Section 19.3 which states that “Amateur radio configurations are provided for where they do not have adverse effects on the character and amenity values of residential and rural areas”.
48. I have also commented on and suggested some amendments to the manner in which the Planner recommends addressing the “Park Over Property” issue raised by the NZMCA.
49. One point I commented on was the reference to sites being registered with the NZMCA which seems to be using the Plan to promote the interests of a private organisation. This is wrong in principle. It should be either deleted or changed to “registered with TCDC”.
50. Also, Council’s rewrite of the Campground and Commercial Recreation / Event Facility rule has highlighted the inadequate development controls in place for these activities. Issues such as suitability of site, numbers of people, facilities, type of activity, and protection of residential amenity are not addressed.

**Proposed Thames Coromandel District Plan
Hearings**

K Vernon

Date: 8 March 2015

Address:

PO Box 99124

Newmarket

Auckland 1149

Attachment 1: Copy of Further Submission of 12 June 2014

Attachment 2: Copy of the Final Primary Submission

Proposed Thames Coromandel District Plan Hearings

Attachment 1: Copy of Further Submission of 12 June 2014

To:

**Thames Coromandel District Council
Proposed Thames-Coromandel District Plan
Private Bag, Thames 3540
Attention: District Plan Manager**

Submitter: K Vernon

1. This is a further submission in support of a submission on the proposed Thames Coromandel District Plan.

2. I am a person who has an interest in the proposal that is greater than the interest the general public has because I made submissions on the Proposed Plan.

3. I support the submission(s) of:

K Vernon, submitter number 182 and 457
Address for service - PO Box 99124, Newmarket, Auckland 1149

This Further submission is made in relation to the "Building Definition, Height, and Height in Relation to Boundary" aspects of the original submission. Council look to have numbered this as item No 182.11 (Also Ref 457.1).

This is a further submission by the original submitter. Four submissions were made on this topic. The last confirmed the decisions sought.

The original series of submissions reflect a developing understanding of the issues and the appropriate decisions required. But the information is spread and somewhat abbreviated. The intention of this further submission is to bring together in one document a succinct summary of the issues involved and reasons for the decisions sought in the final submission. This should assist the panel with its deliberations.

4. The particular parts of the submission(s) I support are:

I support the deletion of the following Section 3 Building definition exclusion:

"Structure no greater than 0.3m wide (maximum horizontal dimension), and no higher than an additional one third of the maximum permitted Height or HRB standard in the applicable rule."

I also support the comment that after deletion it may then be considered appropriate to introduce more specific limited exclusions (in either the definition of building or the definition of Height and HRB) for items such as vent pipes incorporated into a building qualifying as a dwelling (leaving other free standing or

Proposed Thames Coromandel District Plan Hearings

stayed slender structure, such as masts and poles, to comply with the Height and Height in Relation to Boundary provisions in the applicable rule).

I support the general view expressed or implied that exclusions to the building definition, taken together with exclusions to the definition of Height and Height in Relation to Boundary (HRB), will lead to an unacceptable number and level of protrusion through the Height and HRB envelope with potentially adverse effects on amenity.

I support amending the Section 3 Building definition exclusion "Electromagnetic dish (e.g. for communications, TV)." by adding the qualifier "Not more than one dish will be excluded per site. The dish major access dimension must be no more than 0.9m, and the dish including any support structure must not extend more than 1m vertical above the Height and HRB standard in the applicable rule."

5. The reasons for my support are:

The problem with exclusions to the definition of building is that the Height and Height in Relation to Boundary (HRB) provisions apply to a building. This means that the exclusions allow infringements of the Height and HRB envelope. A similar problem arises with the Yard provisions.

It is, therefore, important to ensure such exclusions are limited, clearly defined, and adequately constrained to avoid the purpose of the Height and HRB and Yard provisions being negated.

The Height and HRB definition already has one item excluded in its own definition. Namely, one item with maximum dimensions of 2m horizontal and 1.5m vertical outside the Height and HRB planes. This could possibly be used for say a dormer window or gable end or chimney structure.

The exclusions in the building definition of Section 3 add to this.

Two of these exclusions are of particular concern.

(i) The exclusion "Structure no greater than 0.3m wide (maximum horizontal dimension), and no higher than an additional one third of the maximum permitted Height or HRB standard in the applicable rule"

This provision does not include adequate constraints to control the Height and HRB infringements that it would allow.

The one third (33%) additional vertical height allowance is excessive. In an 8m height zone this would allow a further 2.66m (that is equivalent to another storey) up to a total 10.66m where there was no constraint from the HRB recession plane. Further down the recession plane, say at the 3m height, this exclusion would still allow a 1m extension. It is difficult to see the justification for this additional height. In general it would seem more appropriate to limit the infringement to say 10%. That is 800mm at the 8m limit. This would be adequate for most purposes.

Proposed Thames Coromandel District Plan Hearings

The 0.3m (300mm or approximately 1 foot) horizontal dimension is too large. A 300mm diameter pole extending up to 2.66 metres above the 8m height limit is a significant item of structure. If the intention is to provide for slender items such as vent pipes then a figure of say 0.115m (115mm) would suffice.

The exclusion does not distinguish between free standing structure and other structure attached to a building. So there could be free standing 300mm poles extending up to 10.66m in the 8m zone. This could include items such as masts, flagpoles, light standards, antenna and similar structures.

There is no restriction on the number of protrusion through the Height and HRB planes. So there could be any number of 300mm diameter poles per site that extend a further 2.66m in the 8m zone or free standing masts and poles extending up to 10.66m. Also the poles could be located in Yard areas because they are not buildings.

It is not clear exactly what this exclusion is trying to accommodate. Possibly it is an attempt to cover a wide range of possibilities with one general provision. But it is always difficult to formulate a general exclusion to cover all circumstances adequately.

One reference I found in the residential area Amateur Radio Configuration Rule indicates support poles booms and aerial elements could be up to 0.3m (300mm or approx. 1 foot) wide without control. That is potentially a very large aerial structure and shows how inappropriate this provision is.

What is clear is that because of the lack of adequate constraints there is potential for a large number of significant infringements of the Height and HRB envelope on any one site possibly producing building forms that are significantly out of character with the zone objectives and policy. This is probably an unintended outcome but it may give rise to serious adverse effects and possible conflict.

This exclusion cannot be retained in its current form. It must be either heavily amended or deleted.

The amendment option would include limiting the vertical infringement to say one tenth (10%) which would give a maximum of 0.8m in the 8m height zone. Reducing the 0.3m maximum horizontal dimension to 0.115m (115mm) to reflect the intent of allowing for slender items such as vent pipes (a 100mm ID pipe typically has an OD dimension of about 110mm), limiting the number of protrusions through the Height planes per site (say no more than two per site), limiting application to structure attached to Dwellings or commercial and industrial buildings (leaving free standing structure to comply with the applicable Height and HRB rules).

A revised wording that would encompass all of the above factors is:

“Structure no greater than 0.115m wide (maximum horizontal dimension), and no higher (vertical measurement) than an additional one tenth of the maximum permitted Height or HRB standard in the applicable rule, not more than two such structures per Site will be excluded. This exclusion only applies to structure incorporated into a building used as Dwelling or for commercial or industrial purposes. It does not apply to free standing or stayed slender structures such as masts, poles, lighting standard, aerial / antenna or similar items.”

Proposed Thames Coromandel District Plan Hearings

The other option is to delete the exclusion completely but it may then be necessary to include more specific limited exclusions for defined items such as vent pipes where incorporated in to buildings comprising a dwelling or buildings used for commercial or industrial purposes. This approach is similar to other District Plans which often go to some length to prescribe the infringements permitted for items such as vent pipes, chimneys, antennas, gable ends, dormer windows, and similar items.

Because the exclusions are included in the definitions of Buildings and Height they apply across all zones regardless of environmental sensitivity. For instance the Coastal living zone, where the policy is “retain the existing built character of the settlement including the building density, height and rooflines”, would be affected to the same extent as the high density residential zone.

It may, therefore, be better to minimise exclusions to the definitions and include additional exclusions in the zone rules if thought appropriate where they could be tailored to the relevant Objectives and Policy.

On balance I am of the view that there are so many problems with this exclusion that the prudent action is to delete it from the Proposed Plan and for Council to have a fresh look at the exclusions that are required and the best way to provide for these in the Plan.

My four original submissions show a developing appreciation of the issues round this particular exclusion and how best to address the problem.

The first two submissions attempted to fix the problems with amendments that limit the number and extent of protrusions but only partly addressed the issues and were not entirely satisfactory. They do not for instance distinguish between structural items attached to a dwelling and free standing structure such as masts. Also, the reduction of the extra “one third” to “one fifth” is on reflection not sufficient. A figure of “one tenth” or 10% looks more appropriate. Further the 0.3m width is too large. For vent pipes 0.115m would suffice.

My final submission on this issue recognised that the amendments previously proposed were inadequate to address the problems and that the only satisfactory option was to delete the exclusion from the building definition.

I also added that Council should “Consider introducing more specific limited exclusions (in either the definition of building or the definition of Height and HRB or zone rules) for items such as vent pipes incorporated into a building qualifying as a dwelling” to make the point that after deletion it may be necessary to include other exclusions that target particular requirements in a more defined way. It is likely that these would apply to commercial and industrial buildings as well as dwellings but not to free standing structures.

This further submission takes the same view and supports and seeks deletion of the Section 3 building definition exclusion “Structure no greater than 0.3m wide (maximum horizontal dimension), and no higher than an additional one third of the maximum permitted Height or HRB standard in the applicable rule” from the Proposed Plan.

Proposed Thames Coromandel District Plan Hearings

This further submission also supports the view that after deletion it may be appropriate to include a range of more specific limited exclusions for defined items such as vent pipes where incorporated into buildings comprising a dwelling or buildings used for commercial and industrial purposes (but not for free standing structures). Some consideration of the best place in the plan for these exclusions (definitions or zone rules) would be appropriate. The exclusions may be similar to those in other District Plans but should be tailored to suit the Objectives and Policies of the Thames Coromandel District Plan.

(ii) The exclusion “Electromagnetic dish (e.g. for communications, TV).”

This exclusion has similar problems to (i) above. That is inadequate definition and constraints.

There is no size limit on the dish, no limitation on the degree of noncompliance with the Height and HRB provisions applicable, nor any control on the number of exclusions per site.

The current wording would for instance allow a massive electromagnetic dish say 20m across to sit on top of a roof and it would be excluded from the Height and HRB standards.

My submissions proposed adding a qualifier to the exclusion and finally settled on the following wording: **“Electromagnetic dish (e.g. for communications, TV). Not more than one dish will be excluded per site. The dish major access dimension must be no more than 0.9m, and the dish including any support structure must not extend more than 1m vertical above the Height and HRB standard in the applicable rule.”**

This is based on a standard domestic satellite receiver dish which typically has a major axis dimension of 0.8m. With the angle setting required the dish can be accommodated within less vertical height. The additional vertical allowance of 1m, therefore, provides sufficient flexibility even if the roof is set right on the Height or HRB plane. The control would only allow one such dish to infringe the Height / HRB envelope.

This further submission supports the above amendment.

6. I seek that the whole or part of the submission(s) be allowed / disallowed.

I seek that submission 182 (the final decisions sought re 182.11) is allowed in full.

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

Date: 12 June 2014

Proposed Thames Coromandel District Plan Hearings

Attachment 2: Copy of the Final Primary Submission

To:

**Thames Coromandel District Council
Proposed Thames-Coromandel District Plan
Private Bag, Thames 3540
Attention: District Plan Manager**

Submitter: K Vernon

1. This is a submission on the proposed Thames Coromandel District Plan.

2. I could not gain an advantage in trade competition through this submission.

3. The specific provisions of the proposal that my submission relates to are:

Building definition, Section 3.

4. My submission is:

I oppose some aspects of the Building definition affecting Height (H) and Height in Relation to Boundary (HRB) provisions.

I have previously made two submissions regarding exclusions to the definition of building, height and height in relation to boundary (those submissions dated 11 and 14 March 2014 are hereby referenced).

The previous submissions proposed that there should be some limitations on two of the building definition exclusions namely;

(i) “Structure no greater than 0.3m wide (maximum horizontal dimension), and no higher than an additional one third of the maximum permitted Height or HRB standard in the applicable rule”

and;

(ii) “Electromagnetic dish (e.g. for communications, TV).

My second submission introduced a “per site” limitation but left the “per building” wording of the first submission. On review I think the “per building” wording is redundant.

My second submission also changed the wording “one third” in the exclusion set out in (i) above to “one fifth”.

The amendments previously proposed would therefore be better expressed as -

Amend the definition of Building as follows:

Delete the exclusion “Structure no greater than 0.3m wide (maximum horizontal dimension), and no higher than an additional one third of the maximum permitted Height or HRB standard in the applicable rule” and replace with the following “Structure no greater than 0.3m wide

Proposed Thames Coromandel District Plan Hearings

(maximum horizontal dimension), and no higher than an additional one fifth of the maximum permitted Height or HRB standard in the applicable rule. Not more than three such structures per site will be excluded.”

For the exclusion “Electromagnetic dish (e.g. for communications, TV).” add the following qualifier “Not more than one dish will be excluded per site. The dish major access dimension must be no more than 1m, and the dish including any support structure must not extend more than 1.5m vertical above the Height and HRB standard in the applicable rule.”

However, on review the above do not adequately address the serious issues that I see with these provisions.

An alternative approach would be to delete exclusion (i) above and if considered appropriate introduce more specific limited exclusions (in either the definition of building or the definition of Height and HRB or zone rules) for items such as vent pipes incorporated into a building qualifying as a dwelling, leaving other free standing or stayed slender structure, such as masts, poles, lighting standard, antenna or similar to comply with the Height and Height in Relation to Boundary provisions in the applicable rule. Certainly allowing poles of 300mm diameter to extend up to 10.66m in an 8m height zone with no restriction on number is unacceptable. Special circumstances can usually be considered under the Restricted Discretionary provisions of each zone. This approach now seems the most appropriate to me.

5. I seek the following decision from the Thames Coromandel District Council:

(a) Amend the definition of Building in Section 3 as follows:

Delete the exclusion “Structure no greater than 0.3m wide (maximum horizontal dimension), and no higher than an additional one third of the maximum permitted Height or HRB standard in the applicable rule”

Consider introducing more specific limited exclusions (in either the definition of building or the definition of Height and HRB or zone rules) for items such as vent pipes incorporated into a building qualifying as a dwelling.

For the exclusion “Electromagnetic dish (e.g. for communications, TV).” amend to read as follows

“Electromagnetic dish (e.g. for communications, TV). Not more than one dish will be excluded per site. The dish major access dimension must be no more than 0.9m, and the dish including any support structure must not extend more than 1m vertical above the Height and HRB standard in the applicable rule.”

(b) Make such other amendments to the Proposed Thames Coromandel District Plan as are necessary to fully implement, or are appropriate as a consequence of, the primary relief sought.

**Proposed Thames Coromandel District Plan
Hearings**

(c) Failing acceptance of the above requirements reject the Proposed Thames Coromandel District Plan in its entirety.

6. I wish to be heard in support of my submission.