

**Respondent No:** 9**Login:** Anonymous**Email:** n/a**Responded At:** Feb 10, 2026 12:57:54 pm**Last Seen:** Feb 10, 2026 12:57:54 pm**IP Address:** n/a

Q1. **Full Name** Adrian Sheat

Q2. **Organisation** RML

Q3. **Contact Person (if different from above)** Adrian Sheat

Q4. **Email Address** adrian@moir.co.nz

Q5. **Postal Address** 101 Spey Street, INVERCARGILL

Q6. **Telephone Number** 032172597

Q7. **Could you gain an advantage in trade competition through this submission?** No

Q8. **If you have selected Yes, please answer the question below: Are you directly affected by an effect of the subject matter that, a) adversely affect the environment; and b) does not relate to trade competition or the effects of trade competition.** not answered

Q9. **The specific provisions of the proposal that my submission relates to are as follows:**

SUB-R6(7) . Appendix 11-3. RES1Z-R5

Q10. **I support/oppose these provisions:(include whether you support or oppose in full or in part)**

Oppose

Q11. The reason(s) for my submission are:(state in summary your reasons, and whether you seek any amendments)

SUB-R6(7) – Allotments Less Than 500 m² within Airport Control Boundaries The proposed retention of SUB-R6(7), which restricts allotments of less than 500 m² within the Outer Control Boundary or the Single Event Sound Exposure Boundary, serves no practical planning purpose. The minimum lot size appears to be driven by airport-related considerations, yet it does not address noise effects or land-use compatibility. As such, the rule is unnecessary and should be removed. Appendix 11-3 – Private Ways and Rights of Way The proposed new table in Appendix 11-3 introduces a minimum legal width of 6.0 m for private ways and rights of way in Rural and Rural Lifestyle areas. This directly contradicts the Code of Practice, which specifies a minimum legal width of 3.5 m in Table 5.4 of the Policy. This inconsistency creates uncertainty and should be resolved to ensure alignment between the District Plan and the Policy. Residential Density Controls (350 m²–400 m²) Changing development between 350 m² and 400 m² from a discretionary to a restricted discretionary activity serves no meaningful planning outcome. The minimum lot size should be set at 350 m², as the additional control does not materially improve amenity, infrastructure outcomes, or environmental effects. Minimum Lot Sizes in the Residential 1 Zone Given the existing bulk and location controls—such as site coverage limits, permeable surface requirements, yard setbacks, recession planes, and outdoor living space standards—minimum lot sizes are unnecessary within the Residential 1 zone. These controls already regulate development intensity and amenity outcomes effectively. Lot size should be market-driven rather than arbitrarily constrained. For example, two 80 m² dwellings each on a 200 m² site can achieve equal or better outcomes than a single 160 m² dwelling on a 400 m² site. Both scenarios must comply with the same outdoor living space, yard, height, and recession plane requirements etc. In practice, the two-dwelling scenario is likely to provide greater open space distribution and less site compaction. Stormwater runoff would not increase, and vehicle movements are unlikely to be greater, as a larger 160 m² dwelling is more likely to accommodate a family with multiple vehicles, whereas smaller dwellings typically generate fewer vehicle trips. Any increase in foul sewer discharge would be marginal and well within the capacity of the existing network. Conclusion Minimum lot sizes should be removed entirely from the Residential 1 and Residential 1A zones. Development intensity and amenity are already adequately controlled through bulk and location standards, making minimum lot size controls redundant.

Q12. I seek the following decision from the Invercargill City Council: (give precise details)

SUB-R6(7) – Allotments Less Than 500 m² within Airport Control Boundaries the rule is unnecessary and should be removed. Appendix 11-3 – Private Ways and Rights of Way The proposed new table in Appendix 11-3 introduces a minimum legal width of 6.0 m for private ways and rights of way in Rural and Rural Lifestyle areas. This directly contradicts the Code of Practice, which specifies a minimum legal width of 3.5 m in Table 5.4 of the Policy. This inconsistency creates uncertainty and should be resolved to ensure alignment between the District Plan and the Policy. Minimum lot sizes should be removed entirely from the Residential 1 and Residential 1A zones. Development intensity and amenity are already adequately controlled through bulk and location standards, making minimum lot size controls redundant.

Q13. I wish to be heard in support of my submission Yes

Q14. If others make a similar submission, I would be prepared to consider presenting a joint case with them at any hearing. Yes
