



FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, A SUBMISSION ON NPDC'S NOTIFIED PROPOSED DISTRICT PLAN

Clause 8 of Schedule 1 Resource Management Act 1991

To: New Plymouth District Council
Address: Private Bag 2025, New Plymouth 4342
Email: districtplan@npdc.govt.nz

Further Submitter Details

Name of further submitter: Neil and Susan Drought
Contact person (if different from above) Hamish Walker (BTW Company)
Postal address: PO Box 55, New Plymouth 4340
Email address for service: hamish.walker@btw.nz
Phone number: 06 759 5040 - 027220482

The Council will serve all formal documents by email. Where there is no email address provided, the documents will be posted to the postal address stated above.

I am: (please tick relevant box)

- a) A person representing a relevant aspect of the public interest.
(In this case, also specify the grounds for saying that you come within this category); or
- b) A person who has an interest in the proposal that is greater than the interest of the general public.
(In this case, also explain the grounds for saying that you come within this category); or
- c) The local authority for the relevant area.

Please state the grounds as to why you come within the category selected above:

- This further submission is lodged in support of the original submission prepared by the applicant (submitter Number 575).

Council Hearing (please tick relevant box)

Do you wish to be heard in support of your further submission? Yes No

If others make a similar submission would you consider presenting a joint case with them at a hearing? Yes No

Submission

The submission points, support or opposition, reasons and decisions sought are set out in the attached document.

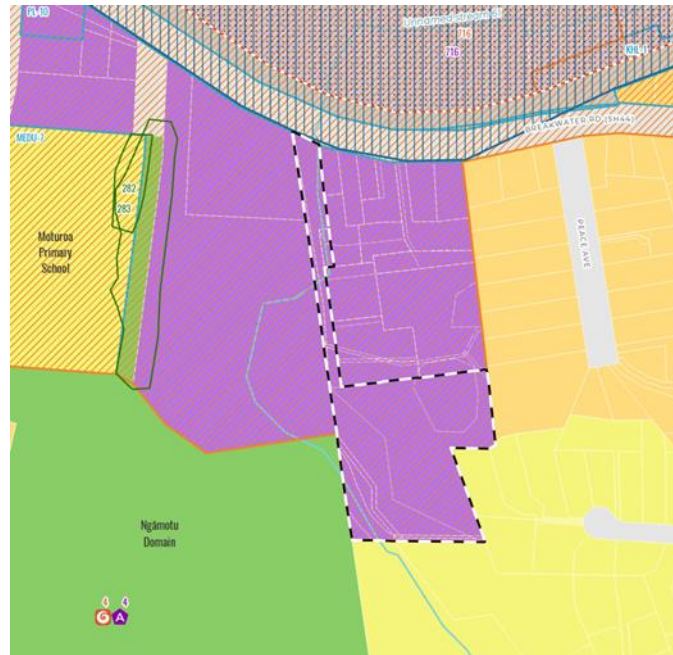
Note: Any attachments to your submission should only be supporting information, not the submission.

24/08/2020

Signature of the person making further submission
or the person authorised to sign on behalf of the
person making further submission

1. Introduction

This further submission has been prepared on behalf of Neil and Susan Drought (the submitter). The further submission attached has been lodged in support of the original submission (submitter number: 575) on the Proposed New Plymouth District Plan (PDP).



2. General Reasons for Submission

The submitter overall seeks to have the property at 69A re zoned from the General Industrial Zone (GIZ) to the Mixed Use Zone (MUZ) for the following reasons:

- Existing lawfully established activities have not been considered in NPDC proposing the GIZ. The vast majority of activities that are currently operating in the area are commercial service and general retail activities, these activities would be better provided for within a MUZ.
- Surrounding adjoining properties are considered to be sensitive to industrial zoning including: living activities, parks/recreation areas and education facilities.

This submission supports in its entirety the submission by Waitomo Petroleum limited (submitter 572) as it adjoins the site at 69A Breakwater Road which also seeks to be re zoned to the MUZ.

3. Broad Support of other submissions

This submission supports the position of a number of other property owners who seek similar relief to recognise existing activities that are more aligned with a mixed-use zone. Therefore, support to these other property owners is provided on the basis of NPDC's lack of acknowledgement of these existing uses.

- Submitter 577: Marsden Machinery Limited – 680 Devon Road, Waiwhakaiho
- Submitter 580: Gordon Stables Industries Limited - 686, 688 Devon Road, Waiwhakaiho
- Submitter 578: Ian Humphry – 696, 700 Devon Road, Waiwhakaiho
- Submitter 579: Bro Devon Limited - 690 Devon Road, Waiwhakaiho

Note: It is noted that NPDC have omitted the first matter included in the original submission which seeks to have the submitter's site re zoned from the GIZ to the MUZ in the planning map provisions. The submitter seeks to have this included in the planning map provisions.

Further Submission matters are as follows:

Name of Further Submitter - Neil and Susan Drought

My specific further submission(s) are as follows:

(Please only insert one further submission point per line. Add further sheets as required)

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
Waitomo Petroleum Limited – Hamish Walker (BTW Company Limited)	Sub No. / Point No. 572.23	Support / Oppose Support	Provision GIZ / Objectives / GIZ-02	Neil and Susan Drought (the submitter) support the submission from Waitomo Petroleum Limited. The site at 69A Breakwater Road adjoins the Waitomo Petroleum Limited site. The submitter agrees that if the site cannot be re zoned to a mixed-use zone, more compatible activities should be provided for in the General Industrial Area.	Allow.
Waitomo Petroleum Limited – Hamish Walker (BTW Company Limited)	Sub No. / Point No. 572.19	Support / Oppose Support	Provision Policies / GIZ / P1	The submitter supports the submission from Waitomo Petroleum Limited and agrees that there should be more compatible activities within the General Industrial Zone. – Note: Both submissions seek re zoning of adjoining sites on Breakwater Road from the GIZ to the MUZ.	Allow.

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
Waitomo Petroleum Limited – Hamish Walker (BTW Company)	Sub No. / Point No. 572.27	Support / Oppose Support	Provision Policies / GIZ / P2	The submitter supports the submission from Waitomo Petroleum Limited and agrees that there should be more potentially compatible activities within the General Industrial Zone. - Note: Both submissions seek re zoning of adjoining sites on Breakwater Road from the GIZ to the MUZ.	Allow.
Waitomo Petroleum Limited – Hamish Walker (BTW Company)	Sub No. / Point No. 572.26	Support / Oppose Support	Provision Policies / GIZ / P3	The submitter supports the submission from Waitomo Petroleum Limited and agrees that there should be more compatible activities within the General Industrial Zone. - Note: Both submissions seek re zoning of adjoining sites on Breakwater Road from the GIZ to the MUZ.	Allow.
Gordon-Stables Industries Limited – Jeremy Brophy (BTW Company Limited)	Sub No. / Point No. 580.1	Support / Oppose Support	Provision GIZ / Zoning	The submitter supports Gordon-Stables Industries Limited’s opposition to the zone change of 700, 690, 688-686 and 680 Devon Road from the Industrial C Area (ODP) to the GIZ. The site to which the submission relates is similar to the submitters own site at 68A Breakwater Road in that sites and adjoining land uses do not represent general industrial characteristics and would be better suited to a MUZ.	Allow.

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
				<p>This example of GIZ zoning is considered to have some similarities to the submitter's property on Breakwater Road, concerning NPDC's determination of the proposed GIZ areas throughout the city.</p>	
<p>Ian Humphrey – Jeremy Brophy (BTW Company Limited)</p>	<p>Sub No. / Point No. 578.1</p>	<p>Support / Oppose Support</p>	<p>Provision GIZ / Zoning</p>	<p>The submitter supports Ian Humphrey's opposition to the zone change of 700, 690, 688-686 and 680 Devon Road from the Industrial C Area (ODP) to the GIZ. The site to which the submission relates is very similar to the submitters own site at 68A Breakwater Road in that current adjoining land uses do not represent industrial characteristics and would be better suited to a MUZ.</p> <p>This example of GIZ zoning is considered to have some similarities to the submitter's property on Breakwater Road, concerning NPDC's determination of the proposed GIZ areas throughout the city.</p>	<p>Seek that the whole submission be allowed.</p>
<p>Marsden Machinery Limited – Jeremy Brophy (BTW Company Limited)</p>	<p>Sub No. / Point No. 577.1</p>	<p>Support / Oppose Support</p>	<p>Provision GIZ / Zoning</p>	<p>The submitter supports Marsden Machinery Limited's opposition to the zone change of 700, 690, 688-686 and 680 Devon Road from the Industrial C Area (ODP) to the GIZ. The site to which the submission relates is very similar to the submitters own site at 68A Breakwater Road in that current adjoining land uses do not represent industrial characteristics and would be better suited to a MUZ.</p>	<p>Seek that the whole submission be allowed.</p>

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
				<p>This example of GIZ zoning is considered to have some similarities to the submitter's property on Breakwater Road, concerning NPDC's determination of the proposed GIZ areas throughout the city.</p>	
Bro Devon Limited – Jeremy Brophy (BTW Company limited)	Sub No. / Point No. 579.1	Support / Oppose Support	Provision GIZ / Zoning	<p>The submitter supports Bro Devon Limited's opposition to the zone change of 700, 690, 688-686 and 680 Devon Road from the Industrial C Area (ODP) to the GIZ. The site to which the submission relates is very similar to the submitters own site at 68A Breakwater Road in that current adjoining land uses do not represent industrial characteristics and would be better suited to a MUZ.</p> <p>This example of GIZ zoning is considered to have some similarities to the submitter's property on Breakwater Road, concerning NPDC's determination of the proposed GIZ areas throughout the city.</p>	Seek that the whole submission be allowed.
Waitomo Petroleum Limited – Hamish Walker (BTW Company Limited)	Sub No. / Point No. 572.1	Support / Oppose Support	Provision GIZ / Zoning	<p>The submitter supports Waitomo Petroleum Limited's opposition to the zone change of 73-79 Breakwater Road to the GIZ. The site the submission refers to is adjoining the submitters site and considered to be encapsulated in the existing mixed-use business area on Breakwater road. The site would be better suited to a MUZ based off surrounding sensitive activities and current adjoining land uses.</p>	Seek that the whole submission be allowed.

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
				This example of GIZ zoning is considered to have some similarities to the submitter's property on Breakwater Road, concerning NPDC's determination of the proposed GIZ areas throughout the city.	
Kāinga Ora - Homes and Communities - Dr Claire Kirman	Sub No. / Point No. 563.615b	Support / Oppose Support in Part	Provision GIZ / Zoning / Planning Maps	The submitter supports the purpose of the submission which identifies areas in the New Plymouth District that have been zoned in the GIZ but should be zoned as the MUZ. The submission states that the re zoning of those GIZ areas will continue to enable business activities, but it will also enable further intensification of sites that are located near a range of attractive amenities for future residents.	The method is acknowledged and supported. More recognition needs to be given to existing mixed-use activities.
Kāinga Ora - Homes and Communities - Dr Claire Kirman	Sub No. / Point No. 563.624h	Support / Oppose Support in Part	Provision MUZ / Rules / New Rule	Support is provided to the new rule should be added to allow for entertainment and hospitality activities within the MUZ. Add a new rule as follows: MUZ-RXX Entertainment and hospitality activities.	Allow.
Kāinga Ora - Homes and Communities - Dr Claire Kirman	Sub No. / Point No. 563.629	Support / Oppose Support in part	Provision MUZ / Rules / New Rule	Considers that a new rule should be added. Submission summary states: Add a new rule as follows: New Activity General retail activities up to 200m2 GFA Activity status: PER Where: 1. any office activity or retail activity that is ancillary to the primary activity occupies no	Allow. Provision for some General retail as a permitted activity is supported.

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
				<p>more than 15 per cent of the gross floor area of the building and is located within the same building on the same site; and</p> <p>2. Mixed Use Zone Effects Standards MUZ-S1 – MUZ-S7 are complied with.</p> <p>Note: Community facilities must meet the noise insulation standards set out in NOISE-S3.</p> <p>Activity status where compliance not achieved: RDIS</p> <p>Matters over which discretion is restricted:</p> <ol style="list-style-type: none"> 1. The extent to which it is necessary to locate the ancillary activity on the same site as the primary activity and/or the extent to which locating the ancillary activity in the Mixed Use Zone may adversely impact on the role and function of the Local, Town or City Centre zones. 2. The extent to which general retail activities exceeding 200m2 GFA in the Mixed Use Zone may adversely impact on the role and function of the Local, Town or City Centre zones. 3. The extent to which the ancillary activity may limit or constrain the establishment and use of land for activities that are permitted in the zone. 4. Any potential reverse sensitivity effects and/or conflict with existing activities, and the ability to mitigate these effects. 5. The extent and effect of non-compliance with any relevant rule or standard and any 	

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
				relevant matters of discretion in the infringed rule(s) or standard(s).	
Kāinga Ora - Homes and Communities - Dr Claire Kirman	Sub No. / Point No. 563.642	Support / Oppose Oppose	Provision MUZ / Rules / New Rule	Submitter considers that a new effects standard should not be added as described below. Submission summary states: Add a new effects standard as follows: Minimum dwelling size To ensure dwellings are functional and of a sufficient size to provide for the day to day needs of residents, based on the number of occupants the dwelling is designed to accommodate; dwellings must have a minimum net internal floor area as follows: 30m ² for studio dwellings. 45m ² for one or more bedroom dwellings. Matters of discretion if compliance not achieved: 1. The adverse effects of reduced apartment size, having regard to: a. The extent to which outdoor living areas and/or balconies are proposed; b. The proximity of the development to public open spaces and/or recreation opportunities; and c. The cumulative effects of reduced dwelling sizes across a development. 2. The extent to which the activity satisfies the policy outcomes under MUZ-P4 and MUZ-P6.	Disallow. Submitter considers that the market is best to decide on the size of dwelling units.

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
Kāinga Ora - Homes and Communities - Dr Claire Kirman	Sub No. / Point No. 563.643	Support / Oppose Support	Provision MUZ / Rules / New Rule	Considers that a new effects standard should be added. Submission summary states: Add a new effects standard as follows: Outlook Space An outlook space must be provided from the face of a building containing windows to a habitable room. Where the room has two or more external faces with windows the outlook space must be provided from the face with the largest area of glazing. 1. The minimum dimensions for a required outlook space are as follows: a. a principal living room of a dwelling or main living and dining area within a boarding house or supported residential care must have a outlook space with a minimum dimension of 6m in depth and 4m in width; and b. all other habitable rooms of a dwelling or a bedroom within a boarding house or supported residential care unit must have an outlook space with a minimum dimension of 3m in depth and 3m in width. 2. The depth of the outlook space is measured at right angles to and horizontal from the window to which it applies. 3. The depth of the outlook space is measured at right angles to and horizontal from the window to which it applies.	Disallow. Submitter considers that the market is best to decide on the size of dwelling units.

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
				<p>4. The width of the outlook space is measured from the centre point of the largest window on the building face to which it applies.</p> <p>5. The height of the outlook space is the same as the floor height, measured from floor to ceiling, of the building face to which the standard applies.</p> <p>6. Outlook spaces may be within the site, over a public street, or other public open space.</p> <p>7. Outlook spaces required from different rooms within the same building may overlap.</p> <p>8. Outlook spaces may overlap where they are on the same wall plane.</p> <p>9. Outlook spaces must:</p> <ul style="list-style-type: none"> a. be clear and unobstructed by buildings; b. not extend over adjacent sites, except for where the outlook space is over a public street or public open space as outlined in MUZ-S9.6 above; and c. not extend over an outlook spaces or outdoor living space required by another dwelling. <p>Note:</p> <p>1. This standard applies to residential activities and visitor accommodation.</p> <p>Matters of discretion if compliance not achieved:</p> <p>The adverse effects of reduced outlook on the amenity of adjoining sites in a residential zone where relevant.</p>	

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
				<p>The ability of existing vegetation and topography on the site or adjoining sites to mitigate any adverse visual effects of reduced outlook.</p> <p>The ability to mitigate any adverse visual effects of reduced outlook through the use of alternative methods.</p> <p>The design, layout and use of the site which may compensate for reduced outlook.</p> <p>The extent to which the reduced outlook satisfies the policy outcomes under MUZ-P4 and MUZ-P6.</p> <p>MUZ - Figure XX - Minimum required outlook space (refer to the diagram in original submission for illustrated changes).</p>	
Landpro Limited – Kathryn Hooper	Sub No. / Point No. 475.5	Support / Oppose Support	Provision MUZ / Rules	<p>The submitter also opposes the non-complying status for business service activities in the MUZ. The submitter agrees that this is overly restrictive and inconsistent with the diversity outcomes the MUZ is supposed to encourage.</p> <p>This matter is also relevant to Rules / MUZR17.</p> <p>Submission summary states: Opposes Business Service Activities being identified in the Mixed Use Zone as incompatible activities because:</p> <ul style="list-style-type: none"> • This is overly restrictive and inconsistent with their effects. 	Allow in part.

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
				<ul style="list-style-type: none"> ● The submitter will potentially have Business Service Activity in the Mixed Use Zone which is discouraged in this zone and encouraged to locate in the city centre. All around are non-complying Business Service Activities. ● Business Service Activities are compatible with the Mixed Use Zone and provide vibrancy and diversity of use that this zone encourages. <p>Supports some parts of the submission and opposes others.</p> <p>Opposition to the following submission points is provided:</p> <ul style="list-style-type: none"> ● The wording and intent does not align with the National Planning Standards definition of Mixed Use Zone: "Areas used predominantly for a compatible mixture of residential, commercial, light industrial, recreational and/or community activities." The word predominantly provides flexibility for other compatible activities to be located in the Mixed Use Zone. ● Disagrees that the Mixed-Use zone will become a 'holding area' for non-residential activities that are not provided for in the City Centre Zone or the Medium Density Residential Zone, creating a 'barrier' between the suburbs and the city centre with a low grade urban form. This is a broad assumption on land use. 	

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
				<ul style="list-style-type: none"> ● The effects of non-residential activities should be managed through a resource consent or prescriptive performance standards are not supported. ● Additional effects standards sought in relate to residential activities are not supported. <p>Support to the following submission points is provided:</p> <ul style="list-style-type: none"> ● The submitter agrees that the plan does not efficiently utilise this resource to achieve its strategic objectives regarding residential intensification, and places a greater emphasis on revitalising the city centre at the expense of efficient land use. ● The zone could further enable high-density residential activities in addition to the City Centre Zone, particularly as the plan does not utilise a high-density residential zone. ● The zone could provide for activities that support high density residential living. General 'convenience' sized retail can be provided (i.e. up to 200m²) that would not compromise the viability of the City Centre Zone or other centres. 	

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
Kāinga Ora - Homes and Communities - Dr Claire Kirman	Sub No. / Point No. 563.646	Support / Oppose Oppose	Provision MUZ	Kāinga Ora supports the use of a design guideline in the mixed use zone. The submitted considers that a Mixed Use Design Guideline is not necessary to support development in the Mixed Use Zone. Support is provided to the current PDP provisions which do not include a design guide.	Disallow.
Z Energy Limited - Sean Stirling (4Sight Consulting)	Sub No. / Point No. 284.16	Support / Oppose Support	Provision CCZ / Policies / New policy	The submitter agrees with the submission point in that specific activities that are anticipated within the MUZ (i.e. supermarkets) have specific functional and operational requirements that may be contrary to design outcomes. While the point is supported, the submitter notes that the objectives and policies for the MUZ do not specifically require urban design considerations, rather ensures that design is compatible with the existing character and amenity values of the surrounding environment. The submitter, therefore supports design related objectives and policies for the MUZ in their proposed form.	Allow - to ensure the operational and functional requirements of supermarkets are not jeopardised by strict design standards.

Note to Further Submitter

This further submission on the Proposed District Plan must be received by the New Plymouth District Council by **5pm on Tuesday 25 August 2020**.

To get your further submission to us, either:

Post to: New Plymouth District Council, Reply Paid DX, DX Box NX10026, New Plymouth.
 Attention: District Planning Team

Deliver to: Civic Centre, Liardet Street, New Plymouth
or to library and service centres at Bell Block, Inglewood or Waitara
Email to: districtplan@npdc.govt.nz
Visit our website: newplymouthnz.com/eplan

A copy of your further submission MUST be served on the original submitter within 5 working days after it is served on the local authority. Contact details for all submitters can be found on our Proposed Plan page at newplymouthnz.com/eplan.

Please note all information provided in your submission, including your personal information, will be made publicly available.

Your submission (or part of it) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of it):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.