

IN THE MATTER

of the Resource Management Act
1991 (“**the Act**”)

AND

IN THE MATTER

of a submission pursuant to Clause 6
of Schedule 1, of the Act in respect
of the **Proposed Far North District
Plan**

SUBMISSION ON THE PROPOSED FAR NORTH DISTRICT PLAN

To: Proposed District Plan
Strategic Planning and Policy, Far North District Council
Far North District Council
Private Bag 752
KAIKOHE 0400
Email: pdp@fndc.govt.nz

1. Details of entity making submission

Traverse Ltd (‘the submitters’)
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2. General Statement

- 2.1 The submitters cannot gain an advantage in trade competition through this submission. They are directly affected by the plan change. The effects are not related to trade competition.

3. Background

3.1 The submitters own a 3.0379ha property (the 'land') located at 373 Kerikeri Road (see **Figure 1** below).

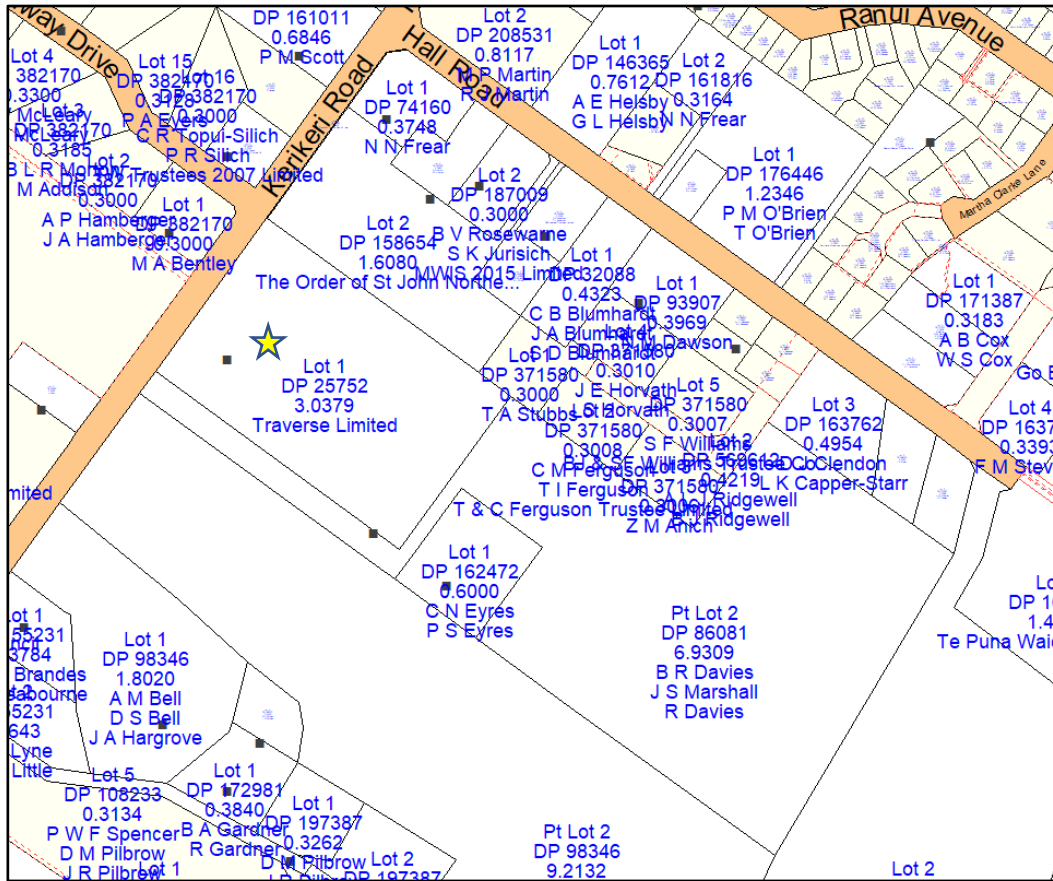


Figure 1: Submitter land

3.2 The land is currently used for horticultural purposes.

3.3 The land is zoned 'Residential' in the Operative Far North District Plan. It is proposed to be zoned General Residential (GRZ) in the Proposed District Plan.

4. The specific provisions of the Plan Change that this submission relates to are:

4.1 The proposed provisions for the General Residential Zone (GRZ) and the district-wide provisions.

5. The submission is:

Policy GRZ-P2

- 5.1 Policy GRZ-P2 should be amended so that it does not require copper connections where fibre is not available. Copper is antiquated technology, and expensive to install. Wireless technology is a more viable alternative in the absence of fibre. **S328.001**

GRZ-R2 'Impermeable surface coverage'

- 5.2 Given the 600m² minimum controlled activity and 300m² discretionary activity lot sizes, restricting impermeable surface coverage to 50% is likely to trigger a resource consent requirement more often than not. It is requested that this be increased to at least 60%. **S328.002**

GRZ-R3 'Residential activity (standalone residential units)'

- 5.3 GRZ-R3 limits the number of permitted residential units to one per title. Given the 600m² minimum lot size for controlled activity subdivision, this rule should be amended to allow residential units at a density of 600m² per residential unit. **S328.003**

GRZ-R5 'Home Business'

- 5.4 This rule sets out the permitted activity requirements for a "home business". A "home business" is defined as:

means a commercial activity that is:

- a. undertaken or operated by at least one resident of the site; and
- b. incidental to the use of the site for a residential activity.

- 5.5 PER-3 is:

All manufacturing, altering, dismantling or processing of any materials associated with an activity is carried out within a building.

- 5.6 Some of the activities in PER-3 fall within the definition of "industrial activities" rather than commercial activities. It is therefore unclear whether these industrial activities are also permitted in the GRZ, in addition to commercial activities, noting that 'industrial activities' are otherwise non-complying activities in this zone. **S328.004**

GRZ-R9 'Residential Activity (multi-unit development)'

- 5.7 The proposed definition for 'Multi-Unit Development' is:

Means a group of two or residential units contained within one contiguous building.

- 5.8 It is unclear why the definition requires residential units to be contained within one contiguous building. A suggested amendment to this definition is as follows:

S328.005

Means a group of two or more residential units ~~contained within one contiguous building located on the same site.~~

- 5.9 If the requested relief for GRZ-R3 is accepted, then GRZ-R9 should be amended to clarify that it only applies where the residential units are not otherwise permitted by GRZ-R3.

S328.006

GRZ-R10 'Retirement Village'

- 5.10 Compliance with RD-1 requires that:

the activity will be accommodated within a new building or structure or extensions to an existing building or structure which comply with the following standards:

- 5.11 This could be interpreted as meaning a singular building or structure, which is unrealistic for a retirement village and presumably not what was intended. A suggested amendment to this definition is as follows:

S328.007

the activity will be accommodated within ~~a~~ new buildings or structures or extensions to ~~an~~ existing buildings or structures which comply with the following standards:

GRZ-S6 Outdoor Living Space

- 5.12 GRZ-S6 requires 50m² of outdoor living space for ground floor units. This is very restrictive on lots the size of those provided for in the GRZ. It is requested that this rule be deleted, or at least reduced to something not exceeding 20m².

S328.008

TRAN-R2 'Vehicle crossings and access, including private driveway accessways' and PER-3

- 5.14 PER-3 requires a discretionary activity resource consent for vehicle crossings to a State Highway or a road classified arterial or higher. It is unclear why a resource consent is required in addition to the standard Waka Kotahi and FNDC crossing permit procedures. This is a duplication of processes and is considered inefficient and ineffective in the context of Section 32 of the RMA. It is requested that PER-3 be deleted.

S328.009

TRAN-R5 'Trip generation' and PER-1

5.15 The trip generation thresholds in TRAN-Table 11 are very low, much lower (for example) than the thresholds in other recently minted plans. The Section 32 report describes the new thresholds as “more enabling”.¹ However, when compared to other District Plans, this is not the case (see table below).

| Activity | Proposed Far North District Plan | Auckland Unitary Plan | Proposed New Plymouth District Plan | Whangarei District Plan |
|------------|--------------------------------------|-----------------------------------|-------------------------------------|-------------------------|
| Office | 800m ² | 5,000m ² | 1,000m ² | 1,250m ² |
| Retail | 200m ² -450m ² | 1,667m ² | 500m ² | 1,000m ² |
| Industrial | 200m ² | 10,000m ² ² | 5,000m ² | 2,500m ² |

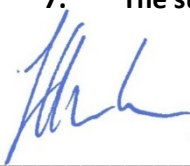
5.16 It is requested that the trip generation thresholds be reconsidered to determine whether they are in accordance with best practice, and whether they best achieve the purpose of the RMA in the context of Section 32.

S328.010

6. The submitter seeks the following decision by the FNDC:

- (1) That the amendments/relief set out in section 5 of this submission are adopted by FNDC.
- (2) Alternative relief with similar effect.

7. The submitter wishes to be heard in support of this submission.



Joseph Henehan

Planning Consultant

Dated this 21st day of October 2022

¹ Page 19 Section 32 Report 'Transport'

² Excludes warehousing and storage which is 20,000m²