

18 November 2024

Hearings Panel
Far North Proposed District Plan
Far North District Council
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Tēnā koutou Commissioners,

Far North Proposed District Plan – Hearing 9 - Rural, Horticulture & Horticulture Processing

Introduction

Willowridge Developments Limited (**Willowridge**) was formed by Allan and Elizabeth Dippie in 1993 and has been developing quality, sought after comprehensive residential and commercial development since the 1990s. Willowridge has an extensive portfolio of projects throughout New Zealand.

Willowridge are land owners in Orongo Bay, a coastal settlement south east of Russell township in the Bay of Islands. Further context regarding Willowridge’s landholdings are outlined in the planning evidence for Hearing 1 – Strategic Direction dated 22 April 2024.

Willowridge are currently preparing a resource consent application for development on their landholdings at Orongo Bay, and more specifically looking to apply for a “management plan subdivision” under the operative Far North District Plan provisions. This is nearing lodgement before the end of 2024, with pre application meetings with Far North District Council and Northland Regional Council, engagement with hapū and marae representatives, and some targeted community engagement already undertaken.

While Willowridge is seeking further subdivision and development of this site via resource consent, it still retains an interest in the PDP Plan provisions as it relates to the proposed rural provisions, and in particular the provisions relating to Rural Lifestyle Zone which is proposed for its site. Willowridge also has a submission relating to the appropriate zoning for the subject site which will be addressed in future Hearings 15A – D.

Supported recommendations

Willowridge supports the Reporting Officers’ recommendations contained in with respect to accepting Willowridge’s following submission points:

- S250.012 SUB-01 – Settlement Zone, retain minimum lot size;
- S250.021 RPROZ-R4, no amendments to the enablement of PRZ visitor accommodation;
- S250.022 RPROZ-R9, minor amendment to the name;

- S250.023 RPROZ-R15, amend 'and' in the tittle;
- S250.024 RPROZ-R19, amending to permitted activity status for minor residential units; and
- S250.027 RLZ-R4, provision of small-scale visitor accommodation.

Recommendations not supported

The Reporting Planner has accepted in part Willowridge submission point S250.012, with a recommended minimum lot size reduction for the RLZ to 2ha as a controlled activity and 1ha as a discretionary activity. While greater aligned with the RLZ chapter, this is still considered as overly restrictive, resulting in fragmented outcomes for land use and subdivision controls. A 2ha controlled minimum in the RLZ leaves a large area of unused land, and it would be more efficient and effective to allow a greater level of development in these areas with smaller lot sizes, for instance an average of 1 allotment / unit per 1ha as a controlled activity, and 1 allotment / unit per 5,000m² as a discretionary activity, which would align with what Willowridge sought in its submission, and aligning with the ODP Coastal Living Zone.

The Reporting Planner has accepted in part amendments requested in S250.026 to RLZ-R3 which sought to provide for residential intensity of one residential unit per 5,000m² as a permitted activity, citing that *“residential activity provisions in the RLZ must align with the minimum lot sizes for the RLZ in SUB-S1 so that subdivision provisions are not undermined by more permissive residential activity provisions”*. Willowridge disagrees with the Reporting Planner, concluding that RLZ-R3 is too restrictive and does not reflect allotment size range of similar zones such as ODP Coastal Living Zone, limiting housing development capacity in existing coastal and rural settlements. As such for this reason, Willowridge continues to seek further amendments to RLZ-R3 as requested in S250.026, however accepts in part the exception for Minor Residential Units recommended by the Reporting Planner in PER-1-ii.

The Reporting Planner has accepted in part amendments to RLZ-R11 in submission point S250.028. Relief sought to remove PER-2, and or alternatively provide justification has been provided. The Reporting Planner disagrees with Willowridge’s submission point on altering activity status with targeted matters/limits to managed effects of clauses PER-14. Willowridge disagrees in part with the Reporting Planning as it is considered to be overly restrictive for minor residential units, limiting housing capacity in rural/coastal settlements which may require short-term residential units for the purpose of farming of service-based practices. The conservative nature of a 15m separation distance limits housing development, resulting in unnecessary consenting costs for future residential units, triggering resource consents.

The Reporting Planner has recommended rejection of Willowridge submission point S250.029 re RLZ-S3 to have one setback standard for side boundaries citing that *“less stringent setbacks for accessory building are necessary as it is harder to meet the RLZ wide setbacks on sites less than 5,000m²”*. The Reporting Planner has recognised that RLZ-S3 was drafted to be consistent with RPROZ-S3, however, the inconsistent approach to setbacks will result in a confusing and fragmented consenting process. For this reason, Willowridge continues to seek the relief sought in submission point S250.029 be accepted.

I can confirm that Willowridge will not be filing evidence for Hearing 9 at this stage, and does not wish to be heard at the hearing. However, I am available to answer any questions from the Hearing Panel either in writing or via videoconference if required.

Yours sincerely | Nāku noa, nā

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