

## FURTHER SUBMISSION ON THE PROPOSED FAR NORTH DISTRICT PLAN

FOR HEARING 15C - Rezoning General - Urban And Rural

FURTHER SUBMITTER - Okura Trust

REGARDING SUBMITTER'S EVIDENCE FROM GRAY GILRAINE HOLDINGS LIMITED,  
S295 – A. McPhee, Planning evidence

### INTRODUCTION

We are Craig Lee and Toni Monro, Trustees for Okura Trust. We are submitting lay evidence as long-term residents of Kerikeri and landowners in the Submission Area.

### SUBMITTER'S EXPERTISE

We have been associated with Kerikeri since the 1970s, have lived here continuously since 1992, being involved in building multiple houses and undertaking property development in Kerikeri over that time, and have owned land in the Submission Area since 2000. We currently own 13 titles in the Submission Area and we used to own the land covered by another 8 of them.

### SUBMISSION SUMMARY

The primary submission by Gray Gilraine Holdings Limited [GGHL] seeks rezoning of an area of landholdings [Figure 1] east of Kerikeri Township to Rural Residential Zone. The land is currently zoned Rural Production in the PDP.

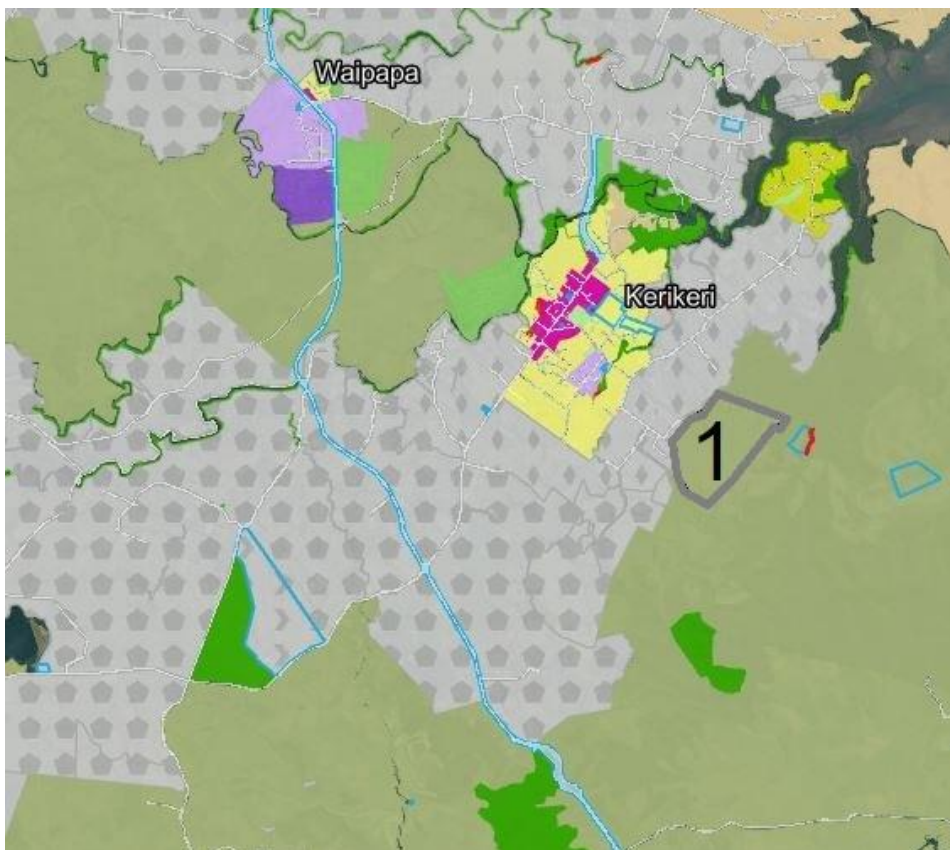


Figure1: FNDC Proposed District Plan Map; 1 = Submission Area

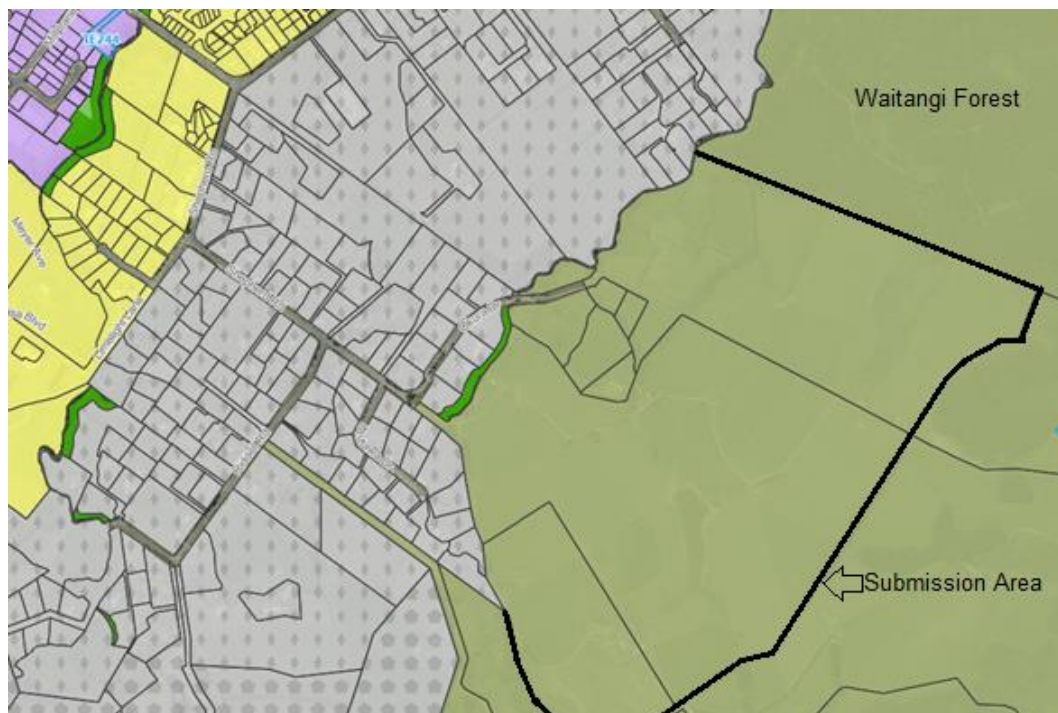
Our further submission supports the extending of the Rural Residential Zone boundary to include the Submission Area, in whole or in part, and gives details for the following evidence:

- **Correction of information regarding current residential density of Submission Area**  
Since the drafting of the District Plan, this area has been subdivided well beyond the requirements of the proposed Rural Production Zone. Under the PDP Rural Production Zone, with the minimum title size of at least 40 ha for a residence, the 100 ha of the Submission Area should only have 2 residences. This contrasts to the reality of 23 titles already being consented, with now only 1 title remaining which is over 40 ha in size.
- **Comparison of the Objectives, Policies and Rules for the different zones**  
In [Appendix 1](#) and discussed below, we have compared zones and show that:
  - i] the Rural Production Zone is no longer appropriate for the Submission Area because its Objectives, Policies and Rules are designed for areas where primary production is prioritised and permitted lot size per residence is at least 40 ha
  - ii] the Rural Residential Zone is much more appropriate because its Objectives, Policies and Rules largely match the lot sizes, residential density and activities that are already in this area, which is now predominantly '*rural residential activities and small scale farming*'.
- **Analysis of the Location of the Submission Area**  
Details show that the Submission Area adjoins the existing Rural Residential Zone and is only 1 km from urban Kerikeri. This means it is ideally suited to be zoned Rural Residential under the Overview requirement that it '*is located on the fringe of the district's settlements and provides a transition to the surrounding Rural Production and/or Rural Lifestyle and Horticulture zones*'. It is also ideally suited to the Rural Residential Zone Overview for future upzoning as it is '*in a location where an urban area may grow and where land may be re-zoned for urban development when demand requires it*'.
- **Details of the Current Infrastructure**  
New infrastructure, including power distribution, is already in place and suitable for Rural Residential density in large parts of the Submission Area. There is good potential for ease of further upzoning in future. The rising main for wastewater from Kerikeri passes through the Submission Area, beside the tarsealed public road extension of Okura Drive, to the Kerikeri Wastewater Treatment Plant, providing efficient options for integration of the area into the reticulated wastewater system in future, when capacity and discharge consents allow.
- **Examples of recent support from Council**  
Suitability of areas within the Submission Area for Rural Residential zoning have already been expressed by Council through comments in Decisions on two subdivision Resource Consents granted since the District Plan was drafted.

## EVIDENCE BEING SUBMITTED

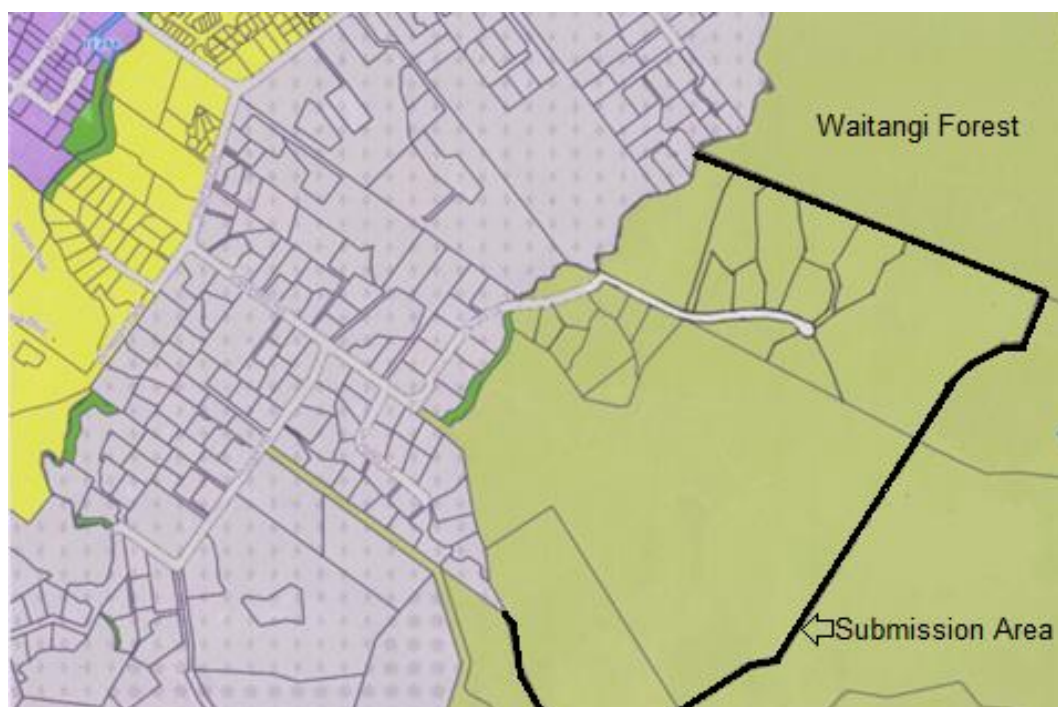
### **Correction of Information Regarding Current Residential Density of Submission Area**

When the District Plan was initially drafted, the FNDC maps showed only 8 titles in the Submission Area [Figure 2].



*Figure 2: FNDC Map showing titles at time of drafting Far North District Proposed Plan*

Since then, there has been significant further subdivision. The GHL submission details 12 titles but, in fact, there are now 23 consented titles in the Submission Area [Figure 3].



*Figure 3: Adapted FNDC PDP Map showing Consented Titles in the Submission Area*

The total amount of land in the Submission Area is approximately 100 ha and comprises title sizes as detailed in Table 1. Only 1 title is over 40 ha in size, which is the permitted minimum size per residence in the proposed Rural Production Zone.

Approximate Title Sizes	Number of Consented Titles
4000 m <sup>2</sup>	5
0.5 – 1 ha	7
1 – 2 ha	5
2 – 5 ha	2
5 – 10 ha	1
10 – 12 ha	2
40 ha or over	1
Total number of titles	23

Table 1: Sizes of Consented Lots in Submission Area

### Comparison of the Objectives, Policies and Rules for the Different Zones

Appendix 1 details examples of how the requirements of the Rural Production Zone [RPROZ] no longer suit the residential density that already exists in this area and, conversely, how the requirements of the Rural Residential Zone [RRZ] do.

#### PDP Zone Overviews

The Rural Production Zone Overview states that *‘The purpose of this zone is to provide for primary production activities including non-commercial quarrying, farming, intensive indoor and outdoor primary production...’* and that it *‘also provides for other activities that support primary production and have a functional need to be located in a rural environment, such as processing of timber, horticulture, apiculture and dairy products...’* This clearly does not fit with the activities and residential density that already occupy a large part of the Submission Area.

The Rural Residential Zone Overview states that *‘the role of the RRZ is to provide an opportunity for people to enjoy a spacious, peri-urban living environment located close to a settlement’*. The rolling contour of the Submission Area, with its elevated views, large areas of established native plantings, potential for reserves, and proximity to the Waitangi Forest mean that it’s development as a Rural Residential Zone provides opportunities for the Kerikeri community to enjoy more access to space and nature through walking, running and cycling.

The location against the Waitangi Forest also provides options for the public to more safely access the forest than the current need to go down Inlet Road, with its narrow, winding section and one lane bridge. Recreational opportunities for the wider Kerikeri community could be developed, linking Kerikeri to Waitangi, as suggested in the FNDC Far North Trails Plan project [Figure 4], and as an alternative access way for Te Araroa walkers and others wishing to get to Waitangi by off road routes.

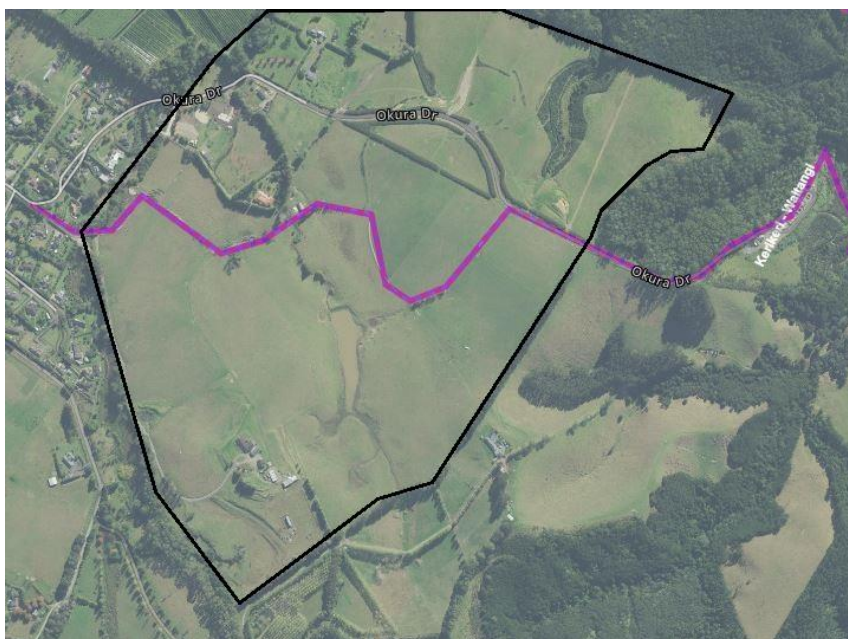


Figure 4: FNDC Far North Trails Plan suggested Kerikeri – Waitangi route via Submission Area

In addition, the Rural Residential Zone Overview recommends that this zoning *‘may also be in a location where an urban area may grow and where land may be re-zoned for urban development when demand requires it’*. This recommendation clearly fits the Submission Area as it would be an extension of the proposed Rural Residential Zone around Kerikeri and not an isolated pocket.

#### PDP Zone Objectives

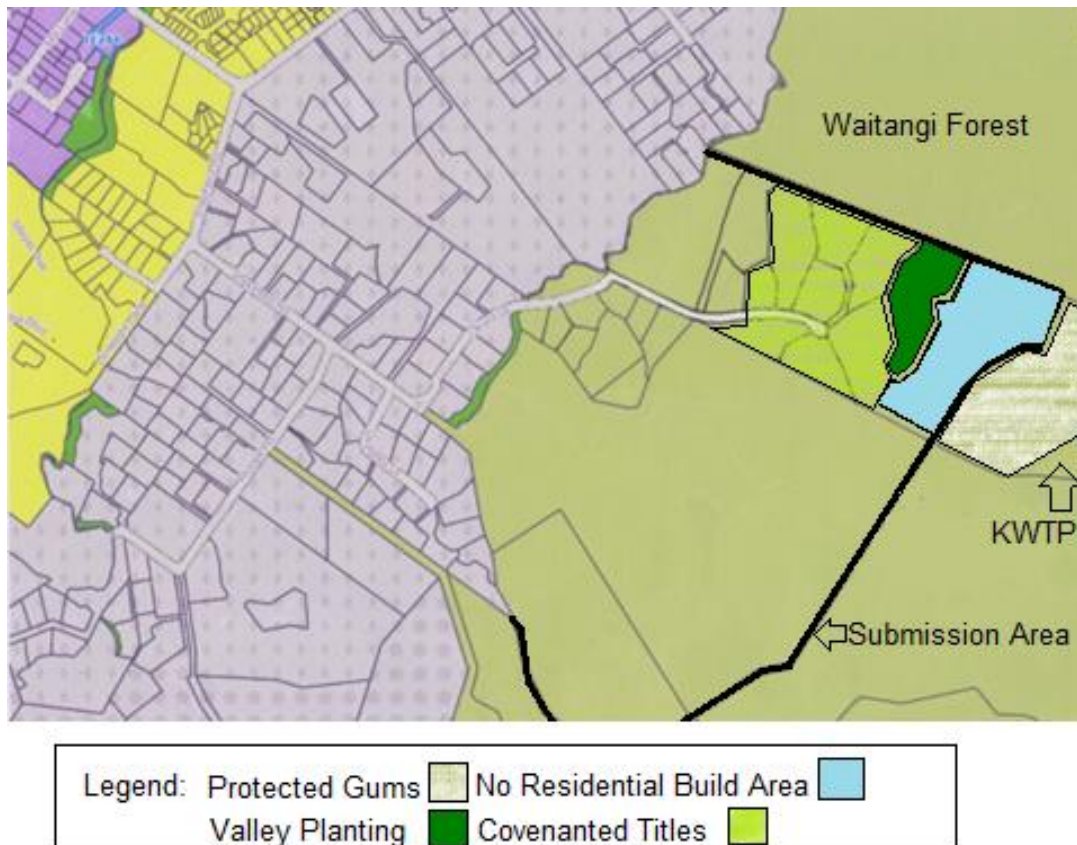
The Rural Production Zone Objectives include that the *‘zone is managed to ensure its availability for primary production activities and its long-term protection for current and future generations’* [RPROZ-O1] and that it is to be *‘used for primary production activities, ancillary activities that support primary production and other compatible activities that have a functional need to be in a rural environment’* [RPROZ-O2]. These objectives are clearly designed to suit large rural areas with a different focus on permissible activities than what is suited to the Submission Area.

The Rural Residential Zone Objectives, on the other hand, include that the area is *‘used predominantly for rural residential activities and small scale farming activities that are compatible with the rural character and amenity of the zone’* [RRZ-O1] and that it *‘helps meet the demand for growth around urban centres while ensuring the ability of the land to be rezoned for urban development in the future is not compromised’* [RRZ-O3]. These objectives closely match the current lot sizes, activities, amenities and potential of at least 20 of the 23 titles in the Submission Area.

An important factor to consider re appropriate zoning is the issue of reverse sensitivity. Rural Production Zone Policy states that *‘typical adverse effects associated with primary production should be anticipated and accepted within the Rural Production zone’* [RPROZ-P1]. In the event of a conflict about this issue between neighbours on small titles within the Submission Area, this Policy will not be helpful or in keeping with reasonable expectations for this situation.

Again, the Rural Residential Zone requirements are more appropriate for the Submission Area: Objective **RRZ-04** ensures that land use and subdivision *‘is managed to control any reverse sensitivity issues that may occur within the zone or at the zone interface’*. An example of this is

already in place. The Submission Area borders on Council land containing the Kerikeri Wastewater Treatment Plant [KWTP]. Both Council and we, as the neighbouring landowner, have contributed to managing reverse sensitivity via multiple safeguards. A large buffer zone has been created, separating residential buildings from the KWTP buildings. Council has provided protection of a 12 ha area of dense, self-sustaining, mature gum plantation on Council land between the KWTP structures and its boundary with the Submission Area. We have provided a covenanted 'no residential build zone' on 6.5 ha of the title adjoining the boundary with the Council land, and this is next to a further 2 ha valley of regenerating native bush separating residents from the KWTP. Consent notices on titles in the area also already contain a comprehensive reverse sensitivity covenant.



#### PDP Zone Policies

The Rural Production Zone contains policies which emphasis *'recognising that typical adverse effects associated with primary production should be anticipated and accepted within the Rural Production zone'* [RPROZ-P1] while instructing that activities should *'Avoid land use that ... does not have a functional need to locate in the Rural Production zone'*[RPROZ-P5]. Once again, these statements have been designed with a different environment in mind to what already exists over a large part of the Submission Area.

Conversely, the Rural Residential Zone Policies include *'Enable activities that will not compromise the role, function and predominant character and amenity of the Rural Residential zone, while ensuring their design, scale and intensity is appropriate, including: a. rural residential activities; b. small-scale farming activities; c. home business activities; d. visitor accommodation...'* and instruction to *'Avoid activities that are incompatible with the role, function*

*and predominant character and amenity of the Rural Residential zone including: a. activities that are contrary to the density anticipated for the Rural Residential zone; b. primary production activities, such as intensive indoor primary production or rural industry, that generate adverse amenity effects that are incompatible with rural residential activities...*’ [RRZ-P1]. Policy wording is directly applicable for what would be suitable for the Submission Area.

#### PDP Zone Rules

The Rural Production Zone rule for permitted Residential Activity has a requirement that *‘The site area per residential unit is at least 40ha’* [RPROZ-R3] and even discretionary activity requires that *‘The site area per residential unit is at least 8ha’*. This does not match the current reality of the Submission Area. Only one of the 23 titles in the 100 ha Submission Area is over 40 ha and only two more are over 8 ha. Twenty of the titles are clustered in an area of 35 ha.

The Rural Residential Zone rule for permitted Residential Activity has a requirement that *‘The site area per residential unit is at least 4000m<sup>2</sup>’* [RRZ-R3]. This is much more in keeping with the residential density that already exists. Of the 23 titles, there are already 5 titles that are ~0.4 ha, 7 titles that are < 1 ha, 5 titles that are < 2 ha, and 2 titles that are < 5 ha.

Examples of other Rules which are out of synchrony with the existing residential density of the Submission Area include:

- The Rural Production Zone rules also allow facilities and activities such as Cemeteries [RPROZ-R14] and Emergency Services Facilities [RPROZ-R17] as permitted activities, whereas these would be discretionary in the Rural Residential Zone, which is far more suitable for the Submission Area.
- In the Rural Production Zone, a site must be at least 1 ha before a Minor Residential Unit is allowed [RPROZ-R19], compared to being at least 4,000m<sup>2</sup> in the Rural Residential Zone [RRZ-R10]. It is hard to understand why the difference would be justified in the Submission Area.

#### **Analysis of the Location of the Submission Area**

The Submission Area position fits the PDP Overview for the Rural Residential zone as it is *‘located on the fringe of the district’s settlements’*. Rezoning would only be an extension of the neighbouring Rural Residential Zone.

This view has already been endorsed by Council, as published in the in the Kerikeri-Waipapa Spatial Plan [KWSP], where a large part of the Submission Area was included for consideration in the Study Area, due to it having ‘Developable land’ close to urban Kerikeri [Figure 4].



Figure 4: Map adapted from Kerikeri-Waipapa Spatial Plan  
 Purple Line = KWSP Study Area Developable land; Black line = Submission Area

The Submission Area is only 1 km from the Kerikeri Urban area as defined in the Kerikeri-Waipapa Spatial Plan, much closer than a recently approved subdivision on Kapiro Road, known locally as 'Tubb's Farm' [Figure 5].

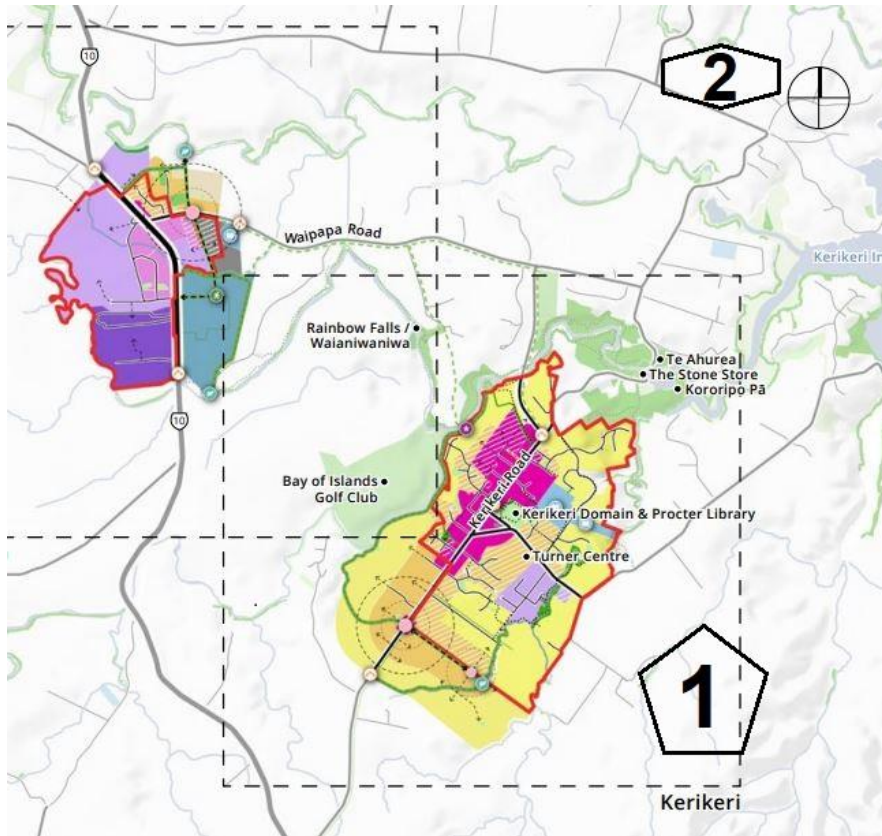


Figure 5: Map adapted from Kerikeri-Waipapa Spatial Plan  
 Area 1 = Submission Area; Area 2 = Tubb's Farm; Red line = Urban Area

The walk to town is on an easy contour and has wide footpath most of the way. It is only 2 km to schools, daycare, shops and light industry. The route from the Submission Area to central Kerikeri via Shepherd's Road and Cobham Drive has minimal traffic congestion compared to the main north and south feeder routes.

The Waitangi Forest bordering the Submission Area acts as a Greenbelt and, in our opinion, provides a more applicable boundary for the Rural Residential Zone around Kerikeri than the Okura Stream. As discussed earlier, the development of the area between the town and the forest could open up recreational opportunities for use of the forest by the urban community of Kerikeri, with links right through to Waitangi.

### **Details of the Current Infrastructure**

The Submission Area already contains significant infrastructure which has been put in since the PDP was drafted. A new power distribution network is in place. A recently completed 600m extension of Okura Drive provides a tarsealed public road to access titles in a third of the Submission Area.

A major benefit for Council of development in the Submission Area is the location between the wastewater pump station for Kerikeri township and the Kerikeri Wastewater Treatment Plant [KWTP]. The rising main for the treatment plant runs through the Submission Area beside Okura Drive and then along a RoW on the Title between the end of Okura Drive and the Plant [Note: this information is a small correction to the location detailed in the GGHL Primary Submission]. When future capacity of the KWTP is increased, provision of infrastructure for wastewater reticulation in this area would be at significantly lower cost compared to the cost of extension of reticulation into distant areas.

### **Examples of Recent Support from Council**

In the time since the PDP was drafted, two subdivisions have been completed within the Submission Area. In both cases, the Resource Consent Decisions from Council have detailed how subdivision in this area is in keeping with the surroundings and does not remove productive land from use.

For Resource Consent **2220225**, involving subdivision of 30 ha of the Submission Area into 12 lots with a 2 ha average size, reasons for the decision included that *'The proposed density is consistent with the rural-urban fringe character of the surrounding area'* and that *'the area is not strictly rural in character, comprising mainly rural-residential development transitioning to undeveloped rural land, and the proposal does not involve loss of land with significant rural production value'*.

For Resource Consent **2220550**, involving subdivision of a 1.7 ha title into 3 titles of 4,000 m<sup>2</sup> and 1 of 5000m<sup>2</sup>, reasons for the Decision included that *'The proposal will also result in positive effects, including creating additional rural residential opportunities within close proximity to Kerikeri Township'*. It was also considered that *'the proposed subdivision is compatible with adjacent land uses'*; that *'The application site is located on the fringes of a well-established cluster of rural residential development'* and it was noted that *'adjoining the site to the east are properties of a similar size'*. In consideration of compliance with the PDP, the Council finding was

*that ‘the development will result in more efficient use of a site that is already no longer rural production in nature, and is within close proximity to the Kerikeri township and a cadastral pattern that is consistent with the cadastral pattern on the immediate surrounding environment’.*

## **Conclusion**

While we understand Council’s desire to use natural features to delineate zone boundaries, like using the Okura Stream as the boundary of the Rural Residential Zone, we think that this academic desire does not fit with the reality which already exists.

Zoning the 23 titles in the Submission Area as Rural Production means that any evaluation of issues by Council for consent will be done using objectives, policies and rules which are incompatible with the existing title sizes, residential density, or activities currently undertaken in the area. Conversely, the Rural Residential Zone documentation is directly applicable to what already exists in the area.

While the Submission Area could theoretically be permitted to contain 175 titles if zoned Rural Residential, as shown in the GGHL Primary Submission, we think overall development to this intensity is unlikely, and that further Rural Residential subdivision in the area still will retain a charming rural character and the current amenity values. This is because many of the current titles are in sizes are likely to retain their desirability as large rural residential lots and small scale farming blocks, the underlying topography creates an interesting outlook, there is already environmental enhancement of the area, and 8.5 ha has been removed from being residential by reverse sensitivity controls. The potential for more reserves and walkways on the border of town and for use of the neighbouring Waitangi Forest by the public can add to the attractiveness of Kerikeri as a place to live.

For the reasons detailed in this submission, and in support of the additional reasons in the GGHL submission, we request extension of the Rural Residential Zone boundary to include the Submission Area. We believe this will have benefits for Council management of the area, for the owners of existing properties, and for the wider Kerikeri community as a whole.

## Appendix I: Extracts from PDP Variation 1, Rural Production and Rural Residential Zones and Their Suitability for the Submission Area

In the tables below, we have looked at examples from the Overview, Objectives, Policies and Rules of the PDP Rural Production and Rural Residential Zones and compared their suitability for the Submission Area.

Red font = potential problems; Green font = suit the Submission Area; Blue font = other findings for comment

### OVERVIEW

Rural Production Variation 1	Rural Residential Variation 1	Comments from Okura Trust
<p>The purpose of this zone is to provide for primary production activities including non-commercial quarrying, farming, intensive indoor and outdoor primary production, plantation forestry activities, and horticulture. The Rural Production zone also provides for other activities that support primary production and have a functional need to be located in a rural environment, such as processing of timber, horticulture, apiculture and dairy products....</p> <p>It is important to differentiate the Rural Production zone from the Rural Lifestyle zone and the Rural Residential zone. The Rural Lifestyle and Rural Residential zones seek to concentrate rural lifestyle or rural residential living in appropriate places in the district, to help avoid further fragmentation of productive land and reverse sensitivity effects on the district's primary sector.</p>	<p>The role of the Rural Residential zone is to provide an opportunity for people to enjoy a spacious, peri-urban living environment located close to a settlement. The Rural Residential zone is located on the fringe of the district's settlements and provides a transition to the surrounding Rural Production and/or Rural Lifestyle and Horticulture zones. ... However, the Rural Residential zone does retain the ability to undertake farming activities at a domestic scale appropriate to the size of the lots.</p> <p>The Rural Residential zone provides for smaller lot sizes of approximately 2,000-4,000m<sup>2</sup> that are capable of providing for on-site infrastructure servicing... Unlike the Rural Lifestyle zone which is not intended to transition to an urban environment, a Rural Residential zone may also be in a location where an urban area may grow and where land may be re-zoned for urban development when demand requires it.</p>	<p>The Rural Production Zone purpose is inappropriate for the level of title density which already exists.</p> <p>The submission area complies with what the Rural Residential Zone seeks</p> <p>The Rural Residential Zone fits well with the existing level of density and location.</p> <p>.</p>

## OBJECTIVES

Rural Production Variation 1	Rural Residential Variation 1	Comments from Okura Trust
<b>RPROZ-O1</b> The Rural Production zone is managed to ensure its availability for primary production activities and its long-term protection for current and future generations.	<b>RRZ-O1</b> The Rural Residential zone is used predominantly for rural residential activities and small scale farming activities that are compatible with the rural character and amenity of the zone	Management primarily as an RPROZ is inappropriate for the level of density which already exists.  The activities in this area already suit the RRZ.
<b>RPROZ-O2</b> The Rural Production zone is used for primary production activities, ancillary activities that support primary production and other compatible activities that have a functional need to be in a rural environment.	<b>RRZ-O2</b> The predominant character and amenity of the Rural Residential zone is maintained and enhanced, which includes: a. peri-urban scale residential activities; b. small-scale farming activities with limited buildings and structures; c. smaller lot sizes than anticipated in the Rural Production or Rural Lifestyle zones; and d. a diverse range of rural residential environments reflecting the character and amenity of the adjacent urban area.	At least a third of the Submission area is no longer used for RPROZ activities.  The submission area already closely fits the character of the RRZ.
<b>RPROZ-O3</b> Land use and subdivision in the Rural Production zone: a. protects highly productive land from sterilisation and enables it to be used more productive forms of primary production ; b. protects primary production activities from reverse sensitivity effects that may constrain their effective and efficient operation;	<b>RRZ-O3</b> The Rural Residential zone helps meet the demand for growth around urban centres while ensuring the ability of the land to be rezoned for urban development in the future is not compromised.	Re RPROZ: a. The soil in the submission area is not classed as highly productive. b. There are 23 titles in the submission area and 17 of them are under 2 ha in size, so the focus of the RPROZ is inappropriate for those titles.  Re RRZ: The submission area is ideally located close to town and close to the Kerikeri Wastewater Treatment Plant, so is suited for RRZ and urban development.

<b>RPROZ-O4</b> The rural character and amenity associated with a rural working environment is maintained.	<b>RRZ-O4</b> Land use and subdivision in the Rural Residential zone: a. maintains rural residential character and amenity values; b. supports a range of rural residential and small-scale farming activities; and c. is managed to control any reverse sensitivity issues that may occur within the zone or at the zone interface.	There are 23 titles in the submission area and 17 of them are under 2 ha in size, so the focus of the RPROZ as a rural working environment is inappropriate for those titles.  Conversely, these titles already fit the RRZ objectives, including management of reverse sensitivity for the Kerikeri Wastewater Treatment Plant.
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## POLICIES

Rural Production Variation 1	Rural Residential Variation 1	Comments from Okura Trust
<b>RPROZ-P1</b> Enable primary production activities, provided they internalise adverse effects onsite where practicable, while recognising that typical adverse effects associated with primary production should be anticipated and accepted within the Rural Production zone.	<b>RRZ-P1</b> Enable activities that will not compromise the role, function and predominant character and amenity of the Rural Residential zone, while ensuring their design, scale and intensity is appropriate, including: a. rural residential activities; b. small-scale farming activities; c. home business activities; d. visitor accommodation; and e. small-scale education facilities	This RPROZ policy is inappropriate for the majority of the 23 titles already in this area.  This RRZ policy is appropriate and already well underway in this area.
<b>RPROZ-P2</b> Ensure the Rural Production zone provides for activities that require a rural location by: a. enabling primary production activities as the predominant land use; b. enabling a range of compatible activities that support primary production activities,	<b>RRZ-P2</b> Avoid activities that are incompatible with the role, function and predominant character and amenity of the Rural Residential zone including: a. activities that are contrary to the density anticipated for the Rural Residential zone;	This RPROZ policy is inappropriate for the majority of the 23 titles already in this area.  This RRZ policy is appropriate for at least 19 of the 23 titles in this area.

including ancillary activities, rural produce manufacturing ...	b. primary production activities, such as intensive indoor primary production or rural industry, that generate adverse amenity effects that are incompatible with rural residential activities;...	
<b>RPROZ-P4</b> Land use and subdivision activities are undertaken in a manner that maintains or enhances the rural character and amenity of the Rural Production zone, which includes: a. a predominance of primary production activities; b. low density development with generally low site coverage of buildings or structures; c. typical adverse effects such as odour, noise and dust associated with a rural working environment;...	<b>RRZ-P4</b> Require all subdivision in the Rural Residential zone to provide the following reticulated services to the boundary: a. telecommunications: i. fibre where it is available; ii. copper where fibre is not available; iii. copper where the area is identified for future fibre deployment. b. local electricity distribution network.	<b>This RPROZ policy is inappropriate for the majority of the 23 titles already in this area.</b>  A local electricity distribution network is in place.  We feel these requirements re telecommunications are already outdated. The copper network is being dismantled around the country and both we and our neighbours use broadband for telecommunications and data.
<b>RPROZ-P5</b> Avoid land use that: a. is incompatible with the purpose, character and amenity of the Rural Production zone; b. does not have a functional need to locate in the Rural Production zone and is more appropriately located in another zone; c. would result in the loss of productive capacity of highly productive land	<b>RRZ-P5</b> Manage land use and subdivision to address the effects of the activity requiring resource consent, including (but not limited to) consideration of the following matters where relevant to the application: a. consistency with the scale and character of the rural residential environment; ... d. the capacity of the site to cater for on-site infrastructure associated with the proposed activity; e. the adequacy of roading infrastructure to service the proposed activity...	<b>This RPROZ policy is inappropriate for the majority of the 23 titles already in this area, and this land is not highly productive.</b>  This RRZ policy is appropriate and already underway for the majority of the 23 titles in this area.

<p><b>RPROZ-P6</b> Avoid subdivision that:</p> <ul style="list-style-type: none"> <li>a. results in the loss of highly productive land for use by farming activities;</li> <li>b. fragments land into parcel sizes that are no longer able to support farming activities, taking into account: <ul style="list-style-type: none"> <li>1. the type of farming proposed; and</li> <li>2. whether smaller land parcels can support more productive forms of farming due to the presence of highly productive land.</li> </ul> </li> <li>c. provides for rural lifestyle living unless there is an environmental benefit.</li> </ul>	<p><b>No entry for RRZ</b></p>	<p>The land in this submission area does not have highly productive soils and has already been fragmented into 23 titles. The PDP RPROZ requires 1 dwelling per 40 ha. There are already 23 titles in the 100 ha submission area and it contains an area with 20 titles in 35 ha.</p>
<p><b>RPROZ-P7</b> Manage land use and subdivision to address the effects of the activity requiring resource consent, including (but not limited to) consideration of the following matters where relevant to the application:</p> <ul style="list-style-type: none"> <li>a. whether the proposal will increase production potential in the zone;</li> <li>b. whether the activity relies on the productive nature of the soil;</li> <li>c. consistency with the scale and character of the rural environment;</li> <li>d. location, scale and design of buildings or structures;</li> <li>e. for subdivision or non-primary production activities: i. scale and compatibility with rural activities; ii. potential reverse sensitivity effects on primary production activities and existing infrastructure; iii. the potential for loss of highly productive land, land sterilisation or fragmentation f. at zone interfaces: i. any</li> </ul>	<p><b>No entry for RRZ</b></p>	<p>These RPOZ consideration points are prioritizing dedicated rural activities, and do not fit the factors which should be given considerations in assessing and managing the effects of land use and further subdivision on the existing 23 titles in this 100 ha submission area.</p>

<p>setbacks, fencing, screening or landscaping required to address potential conflicts; ii. the extent to which adverse effects on adjoining or surrounding sites are mitigated and internalised within the site as far as practicable;</p> <p>g. the capacity of the site to cater for on-site infrastructure associated with the proposed activity, including whether the site has access to a water source such as an irrigation network supply, dam or aquifer; ...</p>		
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## Rules

Rural Production Variation 1	Rural Residential Variation 1	Comments from Okura Trust
<p><b>RPROZ-R3 Residential Activity</b> Activity status: Permitted Where: <b>PER-1</b> The site area per residential unit is at least 40ha.</p> <p>Activity status where compliance not achieved with PER-1 or PER-2: Discretionary Where: <b>DIS-1</b> The site area per residential unit is at least 8ha.</p>	<p><b>RRZ-R3 Residential activity</b> Activity status: Permitted Where: <b>PER-1</b> The site area per residential unit is at least 4,000m<sup>2</sup>.</p>	<p>This RPROZ rule of 1 residence per 40 ha does not match the current reality of the submission area. Only 1 of the 23 titles in the 100 ha submission area is over 40 ha, and only 2 more are over 8 ha.</p> <p>This RR rule matches what already exists. Of the 23 titles, there are already 5 titles that are ~0.4 ha, 7 titles that are &lt; 1 ha, 5 titles that are &lt; 2 ha, and 2 titles that are &lt; 5 ha.</p>
<p><b>RPROZ-R14 Cemeteries/Urupa</b> Activity status: Permitted</p>	<p><b>RRZ-R14 Activities not otherwise listed in this chapter</b> Activity status: Discretionary</p>	<p>Rule 14 is not appropriate for the pre-existing level of density in this area</p>

<b>RPROZ-R17 Emergency service facility</b> Activity status: <b>Permitted</b> Where: <b>PER-1</b> The combined GFA of all buildings on the site does not exceed 150m2 .	<b>No entry for RRZ</b>	Rule 17 is not appropriate for the pre-existing level of density in this area
<b>RPROZ-R19 Minor residential unit</b> Activity status: Controlled Where: ... <b>CON-2</b> The site area per minor residential unit is at least one hectare.	<b>RRZ-R10 Minor residential unit</b> Activity status: Controlled Where: ... <b>CON-2</b> The site area per minor residential unit is at least 4,000m2.	This RPROZ rule is unnecessarily restrictive for the submission area. 14 of the 23 titles is are less than 1 ha.  This RRZ rule is more appropriate for the existing level of subdivision.