

Address: 2 Cochrane Drive, Kerikeri
127 Commerce Street, Kaitaia
Phone: 09 407 5253
Email: office@bayplan.co.nz



To: District Plan Team – Attention: Greg Wilson
Strategic Planning & Policy
5 Memorial Avenue
Private Bag 752
Kaikohe 0440.
Email: greg.wilson@fndc.govt.nz

RE: Submission on the Proposed Far North District Plan 2022

1. **Details of persons making submission**

Mangonui Haulage ('the **Submitter**')
C/- Bay of Islands Planning (2022) Limited
Attention: Steven Sanson
PO Box 318
PAIHIA 0247

2. **General Statement**

The Submitter is directly affected by the Proposed Far North District Plan.

The Submitter cannot gain an advantage in trade competition through this submission. They are directly impacted by the Proposed District Plan. The effects are not related to trade competition.

3. **Background & Context**

Background

The submitter owns a numerous sites where light industrial activities take place. These activities include a haulage and transport yard, a ready mix concrete plant, and other activities associated with light industrial uses.

Site Description

The Submitter owns land comprised within the following Records of Title:

- RT NA93D/367 (Part Allotment 109 Parish of Mangonui); and
- RT 538721 (Lot 2 DP 437473).



Figure 1 NA93D/367 - Industrial Zone



Figure 2 RT 538721 – Rural Production Zone

Operative and Proposed District Plan Zoning

The Operative District Plan reveals the land is zoned **Rural Production** over the Waipapa Site and **Industrial Zone** across the Mangonui Site.





There are no resource features or overlays.

ODP Zone

The PDP seeks to apply the **Rural Residential Zone** [RRZ] over the Waipapa site and the Light Industrial Zone over the Mangonui Site.





4. **The specific provisions of the Proposed Far North District Plan that this submission relates to are:**

- Proposed Planning Zone Maps which relate to the landholdings referred to in Section 3 [**Figure 1**] of this submission;
- The following provisions in the PDP –
 - Light Industrial Zone – Outdoor storage & landscaping**
 - General Provisions – Definitions : Earthworks;**
 - District Wide Rules – Subdivision ;**
 - Earthworks;**
- Any other relief to achieve the outcomes sought by this submission.

5. **The Submitter seeks the following amendments/relief:**

This submission relates to the Proposed Far North District Plan:

- Amend RT 538721 (Lot 2 DP 437473) from the Rural Residential **S318.001** Zone to the Light Industrial Zone.
- Amend the provisions as outlined in Section 5; and
- Any other relief to achieve the outcomes sought by this submission.

The reasons for making the submission on the Proposed District Plan are as follows:

The proposed Rural Residential Zone [RRZ] applies to the Waipapa Site.

The Overview describing the RRZ reveals our clients activities are diametrically opposed to the purpose of the proposed zone. As such it is considered incongruous to retain the property under the Rural Residential Zone.

While it is acknowledged the District Plan cannot create site specific zones in every instance there is merit to change the property to a zone which reflects the activities being undertaken. To that end it is sought the property be zoned **Light Industry** . This zone captures and reflects the nature and scale of the activities on the site. This site includes light industrial uses and its character is light industrial.

In support of this request the PDP includes the Horticultural Processing Zone on what is now operated by Seeka. That zone on the opposite side of Waipapa Road , is site specific , and provides certainty and continuity of their operations.

In addition, on the property adjoining the Seeka operations , resource consent has been granted and a concrete batching plant has now been established. The owners of that land are also seeking to change the zone from Rural Residential to Light Industrial to support their operations.

Contextually the immediate local environment, at this location, is dominated with activities which contribute to the social and economic of the district. One of these activities is suitably embedded into the PDP, Seeka, and in order to create similar certainty our client requests the Light Industrial Zone to be applied to their property.

General Provisions – Definitions : Earthworks;

- Amend the definition to exclude earthworks associated with building foundations. If the definition cannot be amended include an exemption rule within the Earthworks chapter. **S318.002**

The reasons for making the submission on the Proposed District Plan are as follows:

The proposed definition would capture the land disturbance in creating building foundations and drilling holes for concrete piles. This would then become an additional burden on applicants as well as Council having to process and monitor building work.

Light Industrial Zone Provisions

- **Rule LIZ-S5 Outdoor Storage**

Oppose the requirements to screen outdoor storage areas by a fence or wall. S318.003

The reasons for making the submission on the Proposed District Plan are as follows:

The submitter has an existing, consented, and well established light industrial activity on the site. This activity has been in place for some time and exemptions should be made for existing and consented activities.

- **Rule LIZ-S6 Landscaping and screening on road boundaries**

Oppose the requirements to landscape and screen road boundaries. S318.004

The reasons for making the submission on the Proposed District Plan are as follows:

The submitter has an existing, consented, and well established light industrial activity on the site. This activity has been in place for some time and exemptions should be made for existing and consented activities.

There is also internal inconsistency within the PDP as it relates to rules LIZ-S5 and LIZ-S6 as outdoor storage areas along a road boundary need to be screened by a fence, however such outdoor storage areas also need to be landscaped. This will cause unnecessary consenting requirements.

Other Provisions

Subdivision

- **Rule SUB-S1:**

Support the proposed minimum allotment size within the Light Industrial Zone. S318.005

The reasons for making the submission on the Proposed District Plan are as follows:

The allotment size enables better management of the land resources and facilities social and economic well being within the district.

Earthworks

- **EW-S1 Maximum earthworks thresholds**

Oppose the 200m³ threshold and support the 2500m² threshold for the Light Industrial Zone. The volume threshold should be raised to 500m³ S318.006

The reasons for making the submission on the Proposed District Plan are as follows:

These thresholds endeavour to manage the potential effect arising from the earthworks, however the 200m³ threshold is reasonably low.

The new zone should enable minimal consenting requirements to facilitate the ongoing development of the land. The increase on the m3 threshold can be accommodate through the provision of suitable information at the time of the Building Consent application as well as the other standards which require confirmation of earthworks are in accordance with GD-05.

6. **Overall the Submitter wish that the Far North District Council to address the above issues by:**

- Amending RT 538721 (Lot 2 DP 437473) from the Rural Residential Zone to the Light Industrial Zone.
- Amending the provisions as outlined in Section 5 above; and
- Any other relief to achieve the outcomes sought by this submission.

7. Our clients wish to be **heard** in relation this submission.

Yours sincerely,



Steven Sanson

Director | Consultant Planner



Reviewed by

Jeff Kemp

Principal Planning Consultant

On behalf of Mangonui Haulage

Dated 21st Day of October 2022