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

**RE: Submission on the Proposed Far North District Plan 2022**

1. **Details of persons making submission**

Ti Toki Farms Limited [TTFL ]  
C/- Bay of Islands Planning (2022) Limited  
Attention: Steven Sanson  
PO Box 318  
PAIHIA 0247

2. **General Statement**

TTFL are directly affected by the Proposed Far North District Plan. They generally support the provisions within the PDP subject to amendments detailed in this Submission.

TTFL 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

TTFL is private company who undertake development within the Far North. The company owns property in the district, the development of which will contribute to the economic and social wellbeing of the Far North. This being realised through developing the land and then subsequent use of the land.

To maintain the contribution the company makes to the district a substantial investment program is required both in the short and long term. This commitment can be reinforced through the District Plan incorporating the appropriate management strategy as outlined within this submission.

The PDP involves a pattern of zoning and overlays to manage social and economic wellbeing and intrinsic values within the district, which as applicable is supported, however there are nonetheless provisions within the PDP which require deletion or amendment.

#### Site Descriptions

TTFL owns land comprised within the following Record of Title:

- ROT NA56C/27 ( Lot 1 DP 102334)

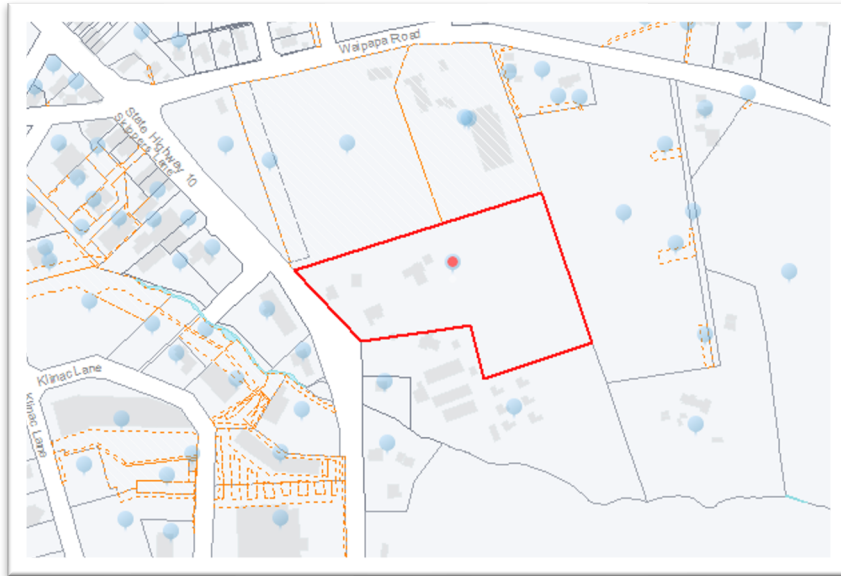
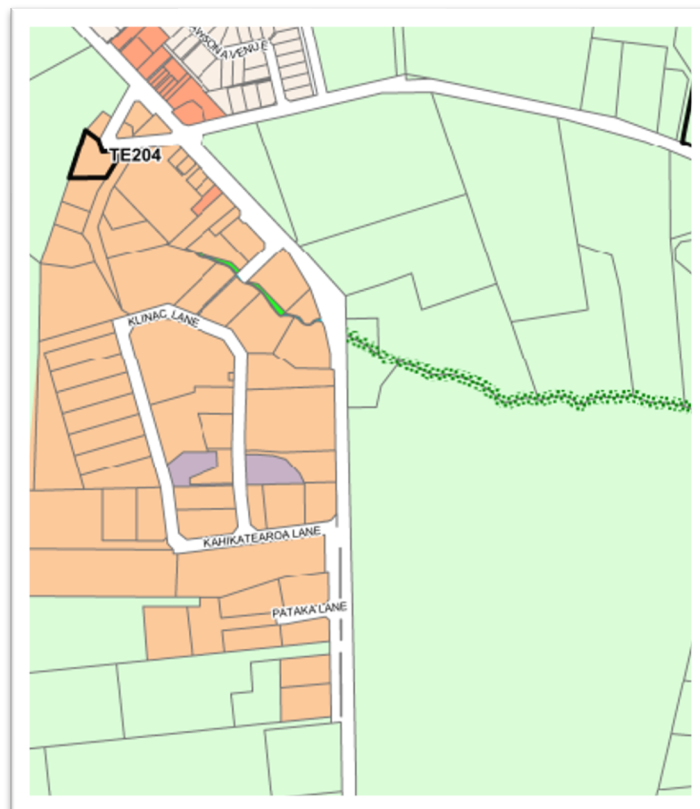


Figure 1 - Site

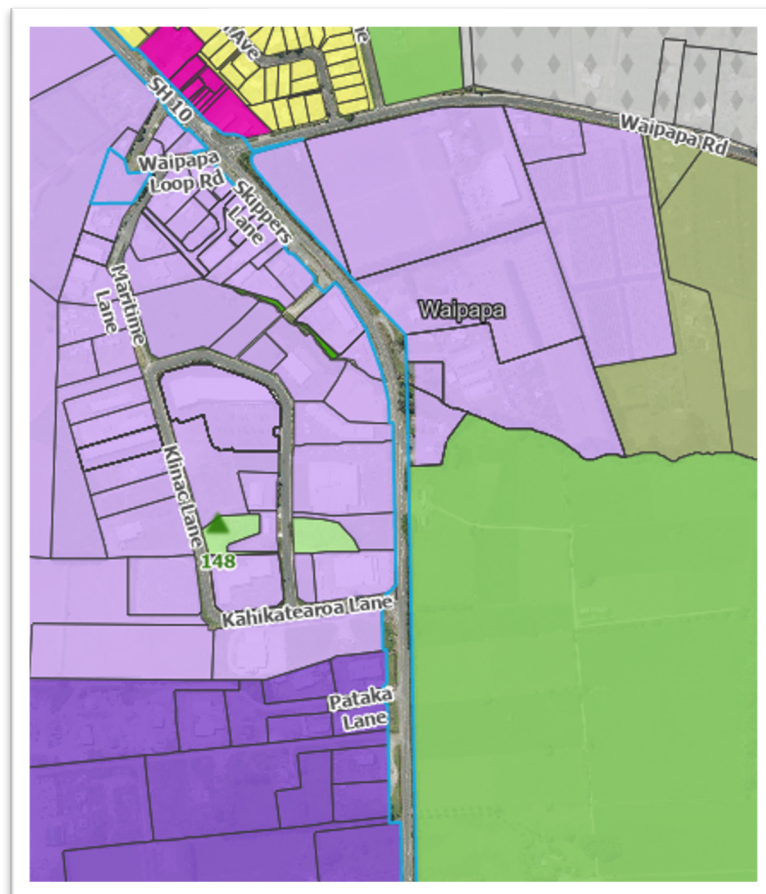
Operative and Proposed District Plan Zoning

The Operative District Plan reveals the land is zoned **Rural Production** and the site has no Resource Features –



## ODP Zone and Resource Maps

The PDP seeks to apply the **Light Industrial Zone** over the site and adjoining properties –



PDP ZONE MAP

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

### **PDP E Maps**

- Proposed Planning Zone Map which relate to the landholdings referred to in Section 3 [ *Figure 1* ] of this submission; and

- The follows provisions in the PDP –

**General Provisions – Definitions : Earthworks;**

**Light Industrial Zone ;**

**District Wide Rules – Subdivision ;**

**Earthworks;**

**Transport**

5. **IDF seek the following amendments/relief:**

This submission relates to the Proposed Far North District Plan:

**PDP E Maps**

- Supports the **Light Industrial Zone** [ LIZ ] over the landholdings as provided for on the PDP E-Maps ;

S262.001

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

The LIZ is effectively replicating some of the land use activities taking place on the land and adjoining properties.

**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.

S262.002

**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**

- **Rule LIZ -R1 New buildings or structures etc**

S262.003

Delete this rule [ **PER-1** ] which limits restricting the gross building area to 450m2. ; Delete **Rule PER-2** and **Rule PER-3 – b – d .**

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

The introduction of the new Light Industrial Zone is being restrained by a limit on the GBA . If the issue of the GBA relates to stormwater management, traffic movements and other factors then this questions Council zoning principles (if any) associated with the site and surrounds.

In terms of any ancillary activity, if this is located within or attached to the principle industrial building / activity, then the effects are in essence internalised. It is not clear what Council is trying to achieve with this provision and it should be deleted.

- **Rule LIZ -S5 Outdoor storage**

Amend this rule to not require screening onto adjoining sites.

S262.004

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

The adjoining sites are used for light industrial activities. The land is for industrial undertaking and the only need to screen would relate to security. The visual presence of activities on adjoining sites in this zone is not an effect which requires management. It places additional non productive requirements upon a land owner.

**Subdivision**

- **Rule SUB-S1 :**

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

S262.005

**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 facilitates social and economic well being within the district.

**Transportation**

- **Rule TRAN-R5 ; Trip generation**

S262.006

- **Rule TRAN-R9 ; New or altered vehicle crossing from a State Highway or LAR.** S262.007
- **TRAN-Table 11- Trip generation** S262.008

Amend these rules to ensure they do not apply to sites or activities which have direct access onto a State Highway or LAR which has been previously approved by Waka Kotahi.

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

The PDP appears to enter into the realm of the managing those effects and activities which fall within the domain of Waka Kotahi. In this regard TTFL propose to create a new intersection onto State Highway 10 with all sites created under the subdivision using this new access point.

As such there is no direct access onto Council infrastructure. The intersection will meet the highway authorities requirements and is not required to be revised by Council. To assess an activities traffic movements leading to the Highway or LAR is a duplication of effort.

- **TRAN – Table 1 – Minimum number of parking spaces**

Support the parking requirements for *Industrial Activities* S262.009

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



The parking thresholds effectively manage the effects of car parking on a site.

- **TRAN – Table 4 – End of trip facilities requirements**

Oppose the rule and should be deleted.

S262.010

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

These requirements are appropriately managed through other legislation and are not required to be embodied into the Proposed District Plan.

**Earthworks**

- **EW-S1 Maximum earthworks thresholds**

Oppose the 200m<sup>3</sup> threshold and support the 2500m<sup>2</sup> threshold for the Light Industrial Zone. The volume threshold should be raised to 500m<sup>3</sup>

S262.011

**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 200m<sup>3</sup> threshold is in conflict with zoning the land for industrial activity.

The new zone should enable minimal consenting requirements to facilitate the development of the land. The

increase on the m<sup>3</sup> 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 TTFL wish that the Far North District Council to address the above issues by:**

1. Supports the new **Light Industrial Zone** as depicted on the PDP E-Maps ;
2. Delete **Rule LIZ -R1 [ PER-1 ]** which limits restricting the gross building area to 450m<sup>2</sup>. ; Delete **Rule PER-2** and **Rule PER-3 – b – d .**
3. Amend **Rule LIZ -S5** to not require screening between adjoining sites.
4. Amend the definition of **earthworks** to exclude building foundations or include an exemption in the Earthworks chapter ;
5. Support **SUB-S1** as it relates to the Light Industrial Zone;
6. Amend **Rule TRAN-R5 ; Rule TRAN-R9 ;** and **TRAN-Table 11-** to ensure these rules do not apply to sites which have access to the Highway or LAR;
7. Support **TRAN – Table 1 –** in relation to *Industrial Activities* ;
8. Oppose **TRAN-Table 4** -which should be deleted ;
9. Oppose and Support **EW-S1** the thresholds for Light Industrial Zone ;
10. 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 Ti Toki Farms Limited.

Dated this 20<sup>th</sup> Day of October 2022.