



Proposed District Plan submission form

Clause 6 of Schedule 1, Resource Management Act 1991

Feel free to add more pages to your submission to provide a fuller response.

Form 5: Submission on Proposed Far North District Plan

TO: Far North District Council

This is a submission on the Proposed District Plan for the Far North District.

1. Submitter details:

Full Name:			
Company / Organisation Name: (if applicable)	BROWNIE FAMILY TRUST		
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2. (Please select one of the two options below)

- I could not gain an advantage in trade competition through this submission
 I could gain an advantage in trade competition through this submission

If you could gain an advantage in trade competition through this submission, please complete point 3 below

3. I am directly affected by an effect of the subject matter of the submission that:
 (A) Adversely affects the environment; and
 (B) Does not relate to trade competition or the effect of trade competition

- I am not directly affected by an effect of the subject matter of the submission that:
 (A) Adversely affects the environment; and
 (B) Does not relate to trade competition or the effect of trade competition

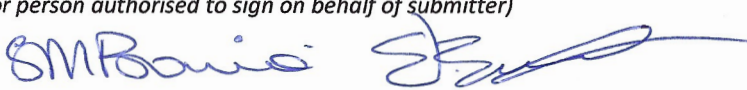
Note: if you are a person who could gain advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

The specific provisions of the Plan that my submission relates to are:

(please provide details including the reference number of the specific provision you are submitting on)

- proposed zoning + overlays
- mixed use zone provisions
- As detailed in attached submission



Confirm your position: <input type="checkbox"/> Support <input checked="" type="checkbox"/> Support In-part <input type="checkbox"/> Oppose <i>(please tick relevant box)</i>
My submission is: <i>(Include details and reasons for your position)</i> please see attached document
I seek the following decision from the Council: <i>(Give precise details. If seeking amendments, how would you like to see the provision amended?)</i> please refer to the attached document
<input checked="" type="checkbox"/> I wish to be heard in support of my submission <input type="checkbox"/> I do not wish to be heard in support of my submission <i>(Please tick relevant box)</i>
If others make a similar submission, I will consider presenting a joint case with them at a hearing <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do you wish to present your submission via Microsoft Teams? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Signature of submitter: <i>(or person authorised to sign on behalf of submitter)</i>  Date: 16/10/2022 <i>(A signature is not required if you are making your submission by electronic means)</i>

Important information:

1. The Council must receive this submission before the closing date and time for submissions (5pm 21 October 2022)
2. Please note that submissions, including your name and contact details are treated as public documents and will be made available on council's website. Your submission will only be used for the purpose of the District Plan Review.
3. Submitters who indicate they wish to speak at the hearing will be emailed a copy of the planning officers report (please ensure you include an email address on this submission form).

Submission on Proposed Far North District Plan

Background

The Brownie Family Trust (the Trust) owns the property at 3B Davis Cres, Paihia. The property and relevant proposed zoning and overlays are shown in Figure 1 below. Although the property has only recently been transferred to the Trust, the property has been in the family for many years and was previously owned by family member Lola Petty who resided at the property for over 30 years.

The street and immediate surrounds have had commercial zoning apply for quite some time. Commercial development has failed to eventuate and increased residential development has occurred instead.

The property is currently rented out to support with costs associated with commercial zoning and with residential aged care for Lola. Going forward, it is important that tenants and any subsequent occupants of the property are able to retain and enjoy basic residential amenities (such as adequate sunlight) and that the residential character of the street and surrounds are not compromised. Appropriate building controls such as set backs from boundaries are necessary to achieve this.

The Trust has a legal obligation to provide certain standards of living for tenants and so is making this submission to ensure that we can reasonably do so.



Figure 1 – 3B Davis Cres

The hills behind Davis Crescent are indicated as High Natural Character within the proposed planning maps (see Figure 2 below).



Figure 2 – Hills mapped as High Natural Character

Outcomes and Relief Sought

The Brownie Family Trust would like zoning and provisions within the Davis Crescent area that appropriately provides for the current residential uses and activities in the area and which better supports and protects existing residential development and residential activities. Future residential development should be enabled.


Detailed submission points follow within this submission which the Trust considers would achieve the outcomes it is seeking. The relief focuses on reducing the use of the Mixed-Use Zone and increasing the extent of the General Residential Zone along with amendments to the provisions which apply to the Mixed-Use Zone.

While detailed requests for amendments are sought, the Trust is (in principle) supportive of other methods and means of relief which will achieve the same outcomes.

Submissions on and the Proposed Planning Maps




The Proposed Far North District Plan has applied the following zones and overlays to 3B Davis Cres:

- Mixed Use Zone
- Coastal Environment
- Building Height Control (Area A)
- Natural Hazards and Risk Overlays
 - Coastal Erosion (Zone 3: 100 years + Rapid Sea Level Rise Scenario)
 - Coastal Erosion (Zone 2: 100-year Scenario)

Submission Point	Provision	Text	Position	Reasons	Relief sought
1	Planning Maps - Mixed Use Zone		Oppose	<p>The proposed zoning does not fit with existing development in the area. The existing residential developments are not compatible with the proposed provisions for the Mixed-Use Zone.</p> <p>125-124 Marsden Road is a Reserve and should be zoned as one of the Open Space and Recreation Zones to ensure appropriate protection and treatment.</p>	<p>1. Re-zone the areas outlined with red in Attachment 1 to General Residential Zone.</p> <p>2. Re-zone 152-154 Marsden Road as an Open Space and Recreation Zone, ideally as Open Space zone.</p>

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2	Planning Maps- Coastal Environment			Support	The coastal environment is appropriate and does need appropriate planning provisions.	Retain the overlay as notified
3	Planning Maps - Building Height Limit (Area A)			Support	The height limit is appropriate to ensure that residential development is not dominated by an inappropriate scale of development. The height limit is compatible with existing development.	Retain the overlay as notified.
4	Planning Maps - Coastal Erosion Hazard Zones			Support	Coastal erosion and coastal hazards do need to be managed to ensure long term viability of development.	Retain the overlay as notified.

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Submissions on the Mixed-Use Zone Provisions

Submission Point	Provision	Text	Position	Reasons	Relief sought
5	Overview	<p>The District's urban business centres have traditionally been zoned commercial and contain retail activities, , food and beverage establishments as well as social and educational services, with limited residential activities.</p> <p>The Mixed-Use zone provides a framework in which commercial and residential activities can co-exist and it enables a range of compatible activities. The focus of the zone is to revitalise urban centres and support business owners, residents and visitors, while ensuring that associated effects are appropriately managed. The Mixed Use zone will contribute to the vibrancy, safety and prosperity of the District's urban centres and will be serviced by appropriate infrastructure.</p> <p>The Council has a responsibility under the RMA, the National Policy Statement on Urban Development and the RPS to ensure that there is sufficient land for housing and business to meet the future demands of the District, that development occurs in the right location and that it is appropriately serviced.</p>	Support in Part	<p>The phrases “The Mixed-Use zone provides a framework in which commercial and residential activities can co-exist and it enables a range of compatible activities” and “...limited residential activities” are at odds with each other. If there is an appropriate framework for commercial and residential activities to co-exist is established, why is it necessary to limit residential activities? The limitation should be removed.</p>	<p>Re-word the objective to read as follows: ...” and beverage establishments as well as social and educational services, with residential activities.”</p>
6	MUZ-O1	<p>The Mixed-Use zone is the focal point for the District's commercial, community and civic activities, and provides for</p>	Support in Part	<p>The current drafting is a little unclear. Does “these activities” mean</p>	<p>Re-word the objective to read as follows: The Mixed-Use zone is the focal point for the District's commercial,</p>

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		residential development where it complements and is not incompatible with these activities.		commercial, community etc. or residential?	community and civic activities, and provides for compatible residential development and compatible residential activities.
7	MUZ-O2	Development in the Mixed-Use zone is of a form, scale, density and design quality that contributes positively to the vibrancy, safety and amenity of the zone.	Support	Development should fit the intended amenity for the zone.	Retain as notified.
8	MUZ-O3	Enable land use and subdivision in the Light Industrial zone where there is adequacy and capacity of available or programmed development infrastructure to support it.	Support in Part	The objective should relate to subdivision in the Mixed-Use Zone	Re-word the objective as follows: ...Mixed use zone...
9	MUZ-O4	The adverse environmental effects generated by activities within the zone are managed, in particular at zone boundaries.	Support	Adverse effects created by the type of development should be managed.	Retain as notified.
10	MUZ-O5	Residential activity in the Mixed-Use zone is located above commercial activities to ensure active street frontages, except where the interface is with the Open Space zone.	Oppose	The location of residential activities in relation to commercial activities won't achieve active frontages and will only limit development that might otherwise be compatible. Quality urban design and appropriate development standards are appropriate methods.	Remove the requirement to locate residential activities above commercial activities from the objective.

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11	MUZ-P1	<p>Enable a range of commercial, community, civic and residential activities in the Mixed Use zone where:</p> <ul style="list-style-type: none"> a. it supports the function, role, sense of place and amenity of the existing environment; and b. there is: <ul style="list-style-type: none"> i. existing infrastructure to support development and intensification, or ii. additional infrastructure capacity can be provided to service the development and intensification. 	Support in Part	Is any change intended in the Mixed-Use zone to achieve the outcomes sought by the Mixed Use zone provisions? If so, the intended amenity and development for the zone needs to be addressed.	Amend policy MUZ-P1 to include guidance to direct the nature of future development.
12	MUZ-P2	<p>Require all subdivision in the Mixed Use zone to provide the following reticulated services to the boundary of each lot:</p> <ul style="list-style-type: none"> a. telecommunications: <ul style="list-style-type: none"> 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; and c. wastewater, potable water supply and stormwater where it is available. 	Support		Retain policy MUZ-P2 as notified.
13	MUZ-P3	<p>Require development in the Mixed Use zone to contribute positively to:</p> <ul style="list-style-type: none"> a. high quality streetscapes; b. pedestrian amenity; c. safe movement of people of all ages and abilities; 	Support		Retain policy MUZ-P3 as notified.

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		<ul style="list-style-type: none"> d. community well-being, health and safety; and e. traffic, parking and access needs. 			
14	MUZ-P4	<p>Require development in the Mixed Use zone that is adjacent to Residential and Open Space zones to maintain the amenity values of those areas, having specific regard to:</p> <ul style="list-style-type: none"> a. visual dominance; b. privacy; c. shadowing; d. ambient noise; and e. light spill. 	Support		Retain policy MUZ-P4 as notified.
15	MUZ-P5	<p>Restrict activities that are likely to have an adverse effect on the function, role, sense of place and amenity of the Mixed Use zone, including:</p> <ul style="list-style-type: none"> a. residential activity, retirement facilities and visitor accommodation on the ground floor of buildings, except where a site adjoins an Open Space zone; b. light or heavy industrial activity; c. storage and warehousing; d. large format retail activity over 400 m²; and e. waste management activity. 	Support in Part	<p>Compatible residential activities and visitor accommodation are an integral part of the Mixed Use zone.</p> <p>The activities should be managed with appropriate standards not restricted. As currently worded P5 contradicts P1 which enables residential activity.</p>	Delete clause 'a' from MUZ-P5.
16	MUZ-P6	Promote energy efficient design and the use of renewable electricity generation in the construction of mixed use development.	Support		Retain policy MUZ-P6 as notified.

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17	MUZ-P7	<p>Consider the following effects when assessing applications to establish residential, early childhood, retirement and education facilities:</p> <ol style="list-style-type: none"> a. the level of ambient noise; b. reduced privacy; c. shadowing and visual domination; and d. light spill. 	Support		Retain policy MUZ-P7 as notified.
18	MUZ-P8	<p>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> <ol style="list-style-type: none"> a. consistency with the scale, density, design, amenity and character of the mixed use environment; b. the location, scale and design of buildings or structures, outdoor storage areas, parking and internal roading; c. at zone interfaces: <ol style="list-style-type: none"> i. any setbacks, fencing, screening or landscaping required to address potential conflicts; ii. any adverse effects on the character and amenity of adjacent zones; d. the adequacy and capacity of available or programmed development infrastructure to accommodate the proposed activity; including: <ol style="list-style-type: none"> i. opportunities for low impact design principles; 	Support		Retain policy MUZ-P8 as notified.

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		<ul style="list-style-type: none"> ii. management of three waters infrastructure and trade waste; e. managing natural hazards; f. the adequacy of roading infrastructure to service the proposed activity; g. any adverse effects on historic heritage and cultural values, natural features and landscapes or indigenous biodiversity, and h. any historical, spiritual, or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6. 			
19	MUZ-R1	<p>New buildings or structures, and extensions or alterations to existing buildings or structures Activity status: Permitted</p> <p>Where:</p> <p>PER-1 The building or structure, or extension or alteration to an existing building or structure will accommodate a permitted activity.</p> <p>PER-2 The building or structure, or extension or alteration to an existing building or structure on the site, excluding large format retail, does not exceed a GFA of 400m².</p> <p>PER-3</p>	Support	The provision is appropriate.	Retain the rule as notified.

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		<p>The new building or structure, or extension or alteration to an existing building or structure complies with standards:</p> <p>MUZ-S1 Maximum height MUZ-S2 Height in relation to boundary MUZ-S3 Setback (excluding from MHWS or wetland, lake and river margins) MUZ-S4 Setback from MHWS MUZ-S5 Pedestrian frontages MUZ-S6 Verandahs MUZ-S7 Outdoor storage MUZ-S8 Landscaping and screening on road boundaries MUZ-S9 Landscaping and screening for sites adjoining a site zoned residential, open space or rural residential MUZ-S10 Coverage</p> <p>Note: All buildings or structures in the Mixed Use zone must comply with the maximum GFA outlined in this rule, except where it is specifically provided for by another rule in this table.</p> <p>Activity status where compliance not achieved with PER-3: Restricted Discretionary</p> <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> a. the matters of discretion of any infringed standard. 			
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		Activity status where compliance not achieved with PER-1 or PER-2: Discretionary			
20	MUZ-R2	<p>Commercial activity Activity status: Permitted</p> <p>Where:</p> <p>PER-1 The activity is a service station.</p> <p>PER-2 Any office does not exceed GFA of 200m².</p> <p>Activity status where compliance not achieved with PER-1 or PER-2: Discretionary</p>	Support in Part	It appear that under this rule any service station is permitted and all commercial activities are permitted provided that GFA is limited. Is this what is intended? Service stations can generate adverse and these should be managed.	Separate the rules for commercial activities and service stations. Change the activity status for a new service station to a discretionary activity.
21	MUZ-R3	<p>Visitor accommodation Activity status: Permitted</p> <p>Where:</p> <p>PER-1 The visitor accommodation is within a residential unit that is located above the ground floor level of a building unless the residential unit existed at 27 July 2022.</p> <p>PER-2 The residential unit complies with standard: NOISE-S5 Noise insulation.</p>	Oppose	The rule as drafted is unduly harsh on new compatible visitor accommodation. Hotels and motels and new residential units should be allowed at ground floor if appropriate urban design standards are met.	Delete PER-1

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		<p>Activity status where compliance not achieved with PER-2: Restricted discretionary</p> <p>Matters of discretion are restricted to:</p> <p>a. the matters of discretion of any infringed standard.</p> <p>Activity status where compliance not achieved with PER-1: Discretionary</p>			
22	MUZ-R4	<p>Residential activity Activity status: Permitted</p> <p>Where:</p> <p>PER-1 The residential activity is within a residential unit that is located above the ground floor level of a building unless the residential unit existed at 27 July 2022.</p> <p>Activity status where compliance not achieved with PER-1: Discretionary</p>	Oppose	People should be able to live in and use a residential unit for residential activity that has been appropriately designed and consented.	Delete MUZ-R4
23	MUZ-R5	<p>Residential unit Where:</p> <p>PER-1 The residential unit is located above the ground floor level of a building unless it existed at 27 July 2022.</p> <p>PER-2</p>	Oppose	New residential units should be allowed at ground floor if appropriate urban design standards are met and the development is compatible.	Delete PER-1

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		<p>Residential units established after 27 July 2022 comply with standard: NOISE-S5 Noise insulation.</p> <p>Activity status where compliance not achieved with PER-2: Restricted discretionary</p> <p>Matters of discretion are restricted to:</p> <p>a. the matters of discretion of the infringed standard.</p> <p>Activity status where compliance not achieved with PER-1: Discretionary</p>			
24	MUZ-R6-R11	<p>Healthcare activity Community facility Emergency service facility Commercial service activity Conservation activity Healthcare activity</p> <p>Activity status: Permitted</p>	Support	These activities are appropriate within a Mixed Use zone provided that they are appropriately designed and are compatible with existing built development.	Retain the rule as notified.
25	MUZ-R12-R17	<p>Educational facility Light industrial activity Retirement village Large format retail Drive-through activity Activities not otherwise listed in this chapter</p> <p>Activity status: Discretionary</p>	Support	The listed activities are appropriate for the Mixed Use zone provided generated effects are managed by way of resource consent.	Retain rules MUZ-R12-R17 as notified.

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26	MUZ-R18-R22	<p>Residential activity on the ground level of sites with pedestrian frontage identified on the planning maps</p> <p>Heavy industrial activity</p> <p>Primary production activity</p> <p>Rural industry</p> <p>Land fill</p> <p>Activity status: Non-complying</p>	Support in Part	<p>New residential units should be allowed at ground floor if appropriate urban design standards are met and the development is compatible. The other activities are best suited to other zones and should not be enabled in the Mixed Use zone</p>	Delete rule MUZ-R18. Retain rules MUZ-R19-R22 are notified.
27	MUZ-S1	<p>Maximum height</p> <p>The maximum height of a building or structure, or extension or alteration to an existing building or structure, is 12m above ground level, except:</p> <ul style="list-style-type: none"> i. the maximum height differs within the following areas that are mapped within Paihia: <ul style="list-style-type: none"> o Area A: 8.5m o Area B: 10m; and ii. that any fence or standalone wall along a side or rear boundary which adjoins a site zoned General Residential, Rural Residential, Rural Lifestyle, Māori Purpose - Urban, Open Space, Natural Open Space, or Sport and Recreation does not exceed 2m in height. 	Support	<p>The height restriction in Area A is appropriate given the existing development and surrounding mapped overlays.</p>	Retain MUZ-S1 as notified.

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		<p>This standard does not apply to:</p> <ul style="list-style-type: none"> i. solar and water heating components not exceeding 0.5m in height above the building envelope on any elevation; ii. Chimney structures not exceeding 1.2m in width and 1m in height above the building envelope on any elevation; iii. Satellite dishes and aerials not exceeding 1m in height above the building envelope and/or diameter on any elevation; iv. Architectural features (e.g. finials, spires) not exceeding 1m in height above the building envelope on any elevation; and v. lift overruns provided these do not exceed the height by more than 1m above the building envelope on any elevation. 			
28	MUZ-S2	<p>Height in relation to boundary Where the building or structure, or extension or alteration to an existing building or structure adjoins a site zoned General Residential, Rural Residential, Rural Lifestyle, Māori Purpose - Urban, Open Space, Natural Open Space, or Sport and Recreation it must be contained within a building envelope defined by recession planes measured inwards from the respective boundary:</p> <ul style="list-style-type: none"> 1. 55 degrees at 2m above ground level at the northern boundary of the site. 	Support in Part	The intention of the standard is supported in principle. To create compatible developments some effects may also be needed within the zone and not just between zone boundaries.	Insert provisions to control the impact of development within the Mixed-Use zone

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		<p>2. 45 degrees at 2m above ground level at the eastern and western boundaries of the site.</p> <p>3. 35 degrees at 2m above ground level at the southern boundary of the site.</p> <p>This standard does not apply to:</p> <ul style="list-style-type: none"> i. solar and water heating components not exceeding 0.5m in height above the building envelope on any elevation; ii. Chimney structures not exceeding 1.2m in width and 1m in height above the building envelope on any elevation; iii. Satellite dishes and aerials not exceeding 1m in height above the building envelope and/or diameter on any elevation. iv. Architectural features (e.g. finials, spires) not exceeding 1m in height above the building envelope on any elevation; and v. lift overruns provided these do not exceed the height by more than 1m above the building envelope on any elevation. 			
29	MUZ-S3	<p>Setback (excluding from MHWS or wetland, lake and river margins)</p> <p>The building or structure, or extension or alteration to an existing building or structure must be setback at least 3m from the boundary of any site zoned General Residential, Rural Residential, Rural Lifestyle, Māori Purpose - Urban, Open Space, Natural Open Space, or Sport and Recreation.</p>	Support in Part	Setbacks between developments are necessary to ensure that adverse effects are appropriately. Zero set backs can compromise urban amenity. Quality Urban design can	Insert controls to manage effects generated between developments within the Mixed-Use zone.

		<p>This standard does not apply to:</p> <ul style="list-style-type: none"> i. solar and water heating components not exceeding 0.5m in height above the building envelope on any elevation; ii. fences or walls no more than 2m in height above ground level; and iii. uncovered decks no more than 1m above ground level. . 		manage effects such as shading.	
30	MUZ-S4	<p>Setback from MHWS The building or structure, or extension or alteration to an existing building or structure must be set back at least 26m from MHWS</p>	Support	The provision provides protection from flooding and sea level rise. It also ensures access to waterways and the ocean.	Retain MUZ-S4 as notified.
31	MUZ-S5	<p>Pedestrian frontages For sites with pedestrian frontage identified on the planning maps:</p> <ul style="list-style-type: none"> 1. At least 65% of the building frontage at ground floor must be clear glazing; and 2. The principal public entrance to the building must be located on the front boundary. 	Support	The provision enables active frontages.	Retain MUZ-S5 as notified.
32	MUZ-S6	<p>Verandas For sites with pedestrian frontage identified on the planning maps:</p> <ul style="list-style-type: none"> 1. Any new building, or extension or alteration to a building (including alterations to the façade) must be built up to the road boundary; and 	Support	Verandahs provide a pleasant environment in a commercial setting.	Retain MUZ-S6 as notified.

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		<p>2. A veranda must be provided for the full frontage of the road boundary of the site. The veranda shall:</p> <ol style="list-style-type: none"> directly adjoin any adjacent veranda so there is no horizontal gap to provide continuous pedestrian coverage; and have a minimum height of 3m and a maximum height of 6m above the footpath immediately below; and be setback a minimum of 300mm and a maximum of 600mm from a vertical line measured up from the face of the kerb. 			
33	MUZ-S7	<p>Outdoor storage Any outdoor storage areas, except for the display of goods for retail sale, must be fully screened by a solid fence or wall of a minimum height of 1.8m so that it is not visible from adjoining sites and roads.</p> <p>This standard does not apply to construction materials to be used on-site for a maximum period of 12 months.</p>	Support	This provides for appropriate visual amenity.	Retain MUZ-S7 as notified.
34	MUZ-S8	<p>Landscaping and screening on a road boundary</p> <ol style="list-style-type: none"> Where a site adjoins a road boundary, at least 50% of that road boundary not occupied by buildings or driveways shall be landscaped with plants or trees. The landscaping shall be a minimum height of 1m at installation and 	Support in Part	The standard is supported in principle. Landscaping can soften an otherwise hard looking development.	Amend the standard to include a provision to manage visibility and ensure pedestrian safety near vehicle crossings (in particular)

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		shall achieve a continuous screen of 1.8m in height and 1.5m in width within five years		Visual sight lines need to be maintained for the safety of traffic and pedestrians.	
35	MUZ-S9	<p>Landscaping for sites that adjoin any sites other than mixed use or industrial</p> <p>Side boundaries that adjoin any zone other than Mixed Use, Light Industrial or Heavy Industrial must:</p> <ol style="list-style-type: none"> 1. be fenced with a solid fence or wall with a minimum height of 1.8m; or 2. be landscaped with plants or trees with a minimum height of 1m at installation and shall achieve a continuous screen of 1.8m in height and 1.5m in width within five years; or 3. be screened with a combination of (1) and (2) above. 	Support in Part	The standard is supported in principle. Landscaping can soften an otherwise hard looking development. Visual sight lines need to be maintained for the safety of traffic and pedestrians. This could be a problem near shared access points.	Amend the standard to include a provision to manage visibility and ensure pedestrian safety near vehicle crossings (in particular)
36	MUZ-S10	<p>Coverage</p> <ol style="list-style-type: none"> 1. At least 10% of the site shall be planted in grass, vegetation or landscaped with permeable material; and 2. The stormwater collection system is designed in accordance with Far North District Council Engineering Standards April 2022. 	Support	Softening a site with landscaping and ensuring stormwater is appropriately managed is supported.	Retain the standard as notified.
37	General	All provisions		Some other methods or means of relief may achieve the outcomes sought.	Use other methods or means of relief that might achieve the same or similar results as the relief sought in this submission.

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38	General	Consequential amendments		Other provisions may need to be amended to achieve the relief sought overall.	Undertake consequential amendments if they are necessary to achieve the results or relief sought within this submission.
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Attachment 1 – Land requested to be re-zoned as General Residential Zone

