

SUBMISSION ON THE PROPOSED FAR NORTH DISTRICT PLAN

BY ARVIDA GROUP LIMITED

INTRODUCTION

- 1. Arvida Group Limited ("Arvida"), c/- Haines Planning Consultants Limited at the address for service below, makes this submission on the Far North District Council's ("the Council") Proposed District Plan ("PDP").
- 2. Arvida is a leading provider of retirement living and aged care services in New Zealand and a publicly listed company on the NZX. It owns and operates 33 retirement villages across New Zealand. These villages provide care services and accommodation to more than 4,750 residents and employ approximately 2,600 staff (as registered nurses, caregivers and other management and support staff). Each village expresses its own character and identity and serves an important function in their communities.
- 3. One of Arvida's newest retirement villages is located at the end of Hall Road in Kerikeri. Named "Te Puna Waiora" retirement village, it will be the largest in the Far North District with 192 villas proposed. The consented development is being rolled-out in stages with approximately 60 villas completed as at December 2022. When fully developed, Te Puna Waiora will be home to approximately 380 residents. A copy of the consented Masterplan is included as **Attachment 1**.
- 4. Arvida's landholding extends beyond the consented retirement village site and includes the adjacent properties at 56 Hall Road, 59 Hall Road and 30 Limelight Lane as identified on **Attachment 2**. Collectively, the Arvida-owned properties are referred to in this submission as "the Site".
- 5. As the developer, operator and long-term owner of a significant asset, Arvida is a key stakeholder within the Kerikeri community and the Far North District. Arvida has a strong interest in the outcome of the Proposed District Plan Review process and makes this submission accordingly.

GENERAL FEEDBACK

- 6. Arvida acknowledges and appreciates the work that the Council has put into developing the PDP. Having been involved as a submitter on the earlier draft version of the District Plan. Arvida has identified a number of notified PDP provisions on which it wishes to submit, with associated reasons and requested amendments (refer **Attachment 3**).
- 7. For those provisions which it opposes, Arvida considers that the proposed amendments will better promote the purpose and principles of the Resource Management Act 1991 ("RMA").
- 8. Arvida reserves the right to revise its position in response to other submissions or changes to the notified provisions.
- 9. Arvida confirms that it:
 - a. could not gain an advantage in trade competition through this submission;
 - b. wishes to be heard in support of this submission; and
 - c. would consider presenting a joint case with any other party seeking similar relief.
- 10. Arvida agrees to participate in mediation or other alternative dispute resolution, and would be pleased to discuss the content of this submission with Council staff, as required.

David Haines

On behalf of Arvida Group Limited

Date: 18 October 2022

Address for Service Arvida Group Limited

C/- Haines Planning Consultants Limited PO Box 90842, Victoria Street West

AUCKLAND 1142

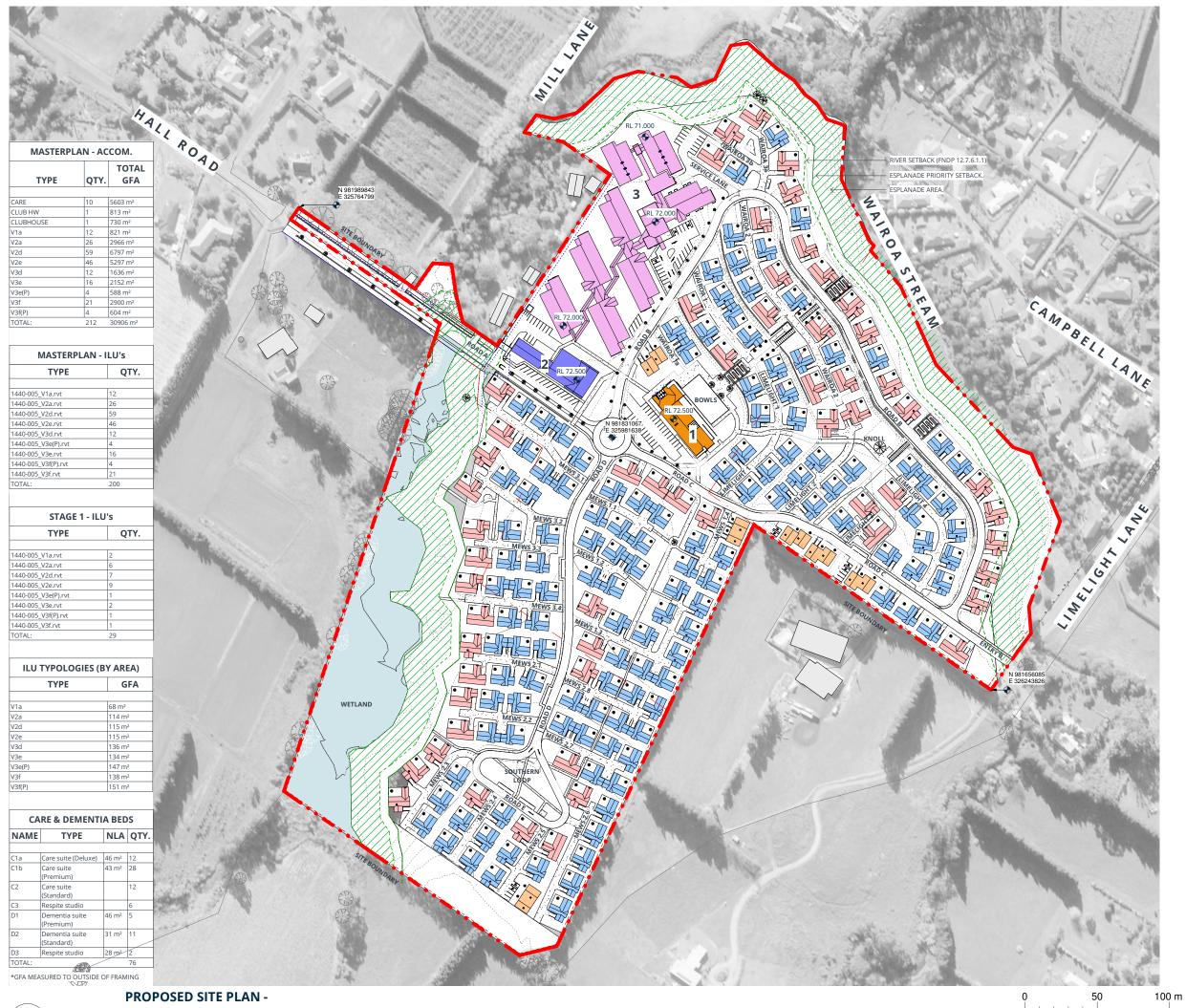
Attention: David Haines

Telephone: (09) 360 1182

Email: david.haines@hainesplanning.co.nz

Attachment 1

RC Masterplan





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Rev Description

A RESOURCE CONSENT RC#3 31.01.20

RESOURCE CONSENT

NOTES

- LOT BOUNDARIES AND AERIAL PHOTO INFORMATION TAKEN FROM THOMSON SURVEY LTD. TOPOGRAPHICAL SURVEY, REF: 9411 180904.
- 2. WAIROA STREAM SETBACK INFORMATION TAKEN FROM DONALDSONS SURVEY, REF:

DISTRICT SERVICES Date: 30/10/2020

CONSULTANTS

Client Name.
KERIKERI LAND LIMITED

Project Name.
KERIKERI RETIREMENT VILLAGE

57C HALL ROAD & 22 LIMELIGHT LANE, KERIKERI

Drawing Title
PROPOSED SITE PLAN -MASTERPLAN

SCALE 1:1250 @ A1

Α1

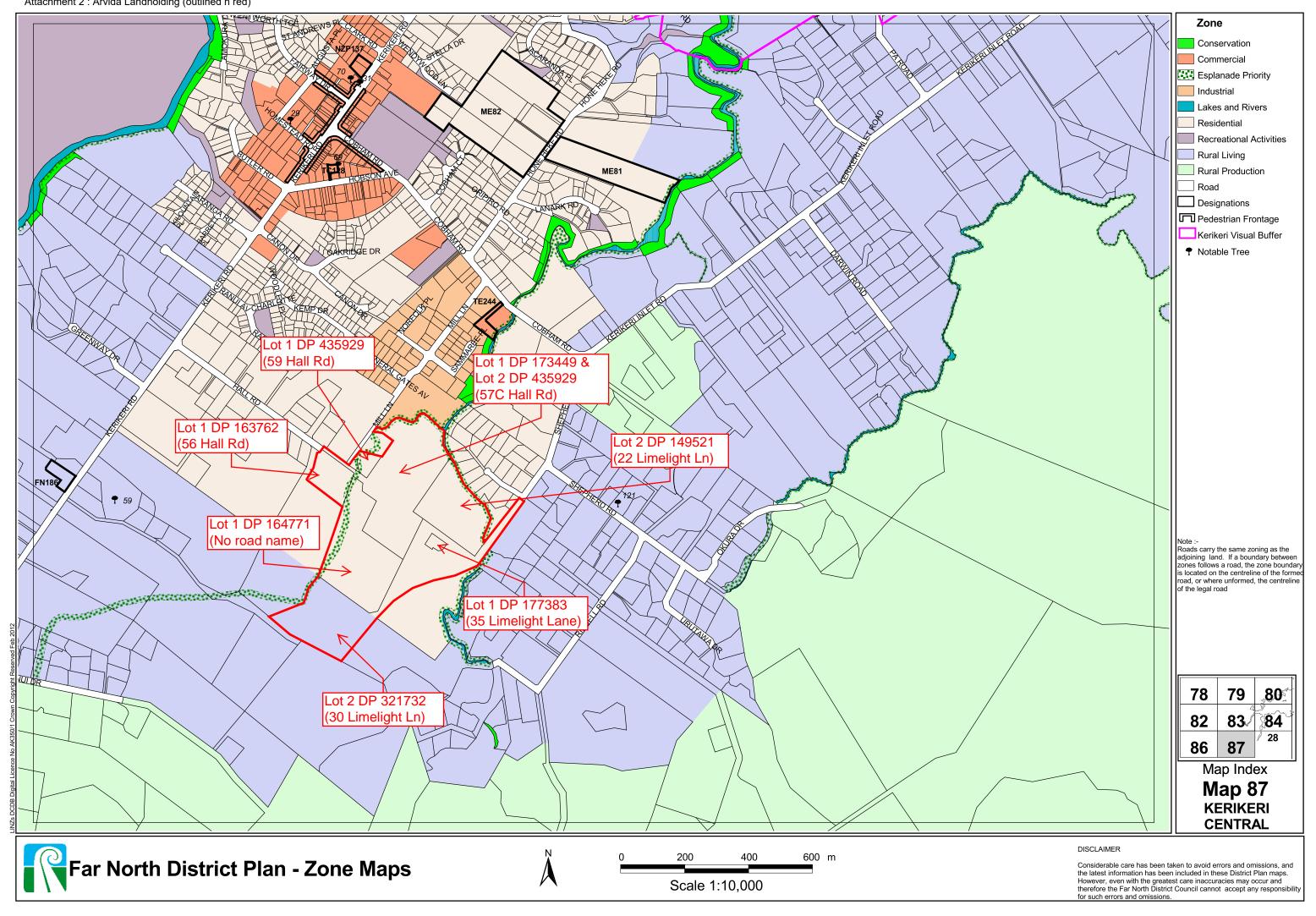
ISL-1440-005-IAL

Drawing No. A1012

MASTERPLAN A1 SCALE1: 1250

Attachment 2

Site Reference



Attachment 3

Specific Submission Points

Attachment 3: Specific Submission Points

	#	Provision	Support/ Oppose	Reasons	Relief sought		
	Planning Maps						
S165.001	1.	General Residential Zone for the following sites: a) Lot 1 DP 173449 and Lot 2 DP 435929 (57C Hall Road) b) Lot 1 DP 435929 (59 Hall Road) c) Lot 1 DP163762 (56 Hall Road) d) Lot 1 DP 164771 (No road name) e) Lot 2 DP 149521 (22 Limelight Lane) f) Lot 1 DP 177383 (35 Limelight Lane) g) Northern portion of Lot 2 DP 321732 (30 Limelight Lane)	Support	The listed sites are owned by Arvida Group Limited and form part of the Te Puna Waiora Retirement Village which is being constructed in reliance on resource consents held over the majority of these sites. The General Residential Zone is the most appropriate zone because retirement villages (as defined in the Interpretation section of the Proposed District Plan (PDP)) are provided for as restricted discretionary activities within this zone.	Uphold proposed General Residential Zone for the listed sites.		
S165.002	2.	Rural Residential Zone for the following site: Southern portion of Lot 2 DP 321732 (30 Limelight Lane)	Oppose	The site legally described as Lot 2 DP 321732 is owned by Arvida Group Limited and forms part of the Te Puna Waiora retirement village complex. This irregular parcel of land has been given a split zoning based on the simple extrapolation of "straight line" which has no regard to the site's single land ownership and the ability for integrated management of resources to be achieved based on land tenure arrangements.	Re-zone that part of Lot 2 DP 321732 shown as Rural Residential on the PDP planning maps to General Residential zone (Refer Attachment 1).		
	Part 1: Introduction and General Provisions (Definitions)						
S165.003	3.	Definition – Retirement Village	Support	The definition recognises that on-site healthcare and communal facilities are integral to the operation of a modern retirement village. This recognition allows retirement village proposals to be considered holistically and avoids the need to arbitrarily break down a retirement village into "residential" and "non-residential" components.	Uphold and retain the definition of "retirement village".		

	#	Provision	Support/ Oppose	Reasons	Relief sought		
S165.004	4.	Definition – Urban Environment Allotment	Oppose	The 4000m2 maximum area of land in clause 1 of the "Urban Environment Allotment" definition is not needed. This clause does not align well with the preceding definition of "urban" and therefore limits the Council's ability to meet its obligation under the NPS:UD 2020 as a Tier 3 territorial activity, to provide for urban growth within the District.	Delete clause 1 from the definition of "Urban Environment Allotment".		
		Part 2: District-Wide Matters (including Strategic Direction, Transport and Signs)					
\$165.005 \$165.006 \$165.007 \$165.008		infrastructure Objectives I-O1, I-O2 and Policies I-P1 and I-P4	Support In part	The "statement of intent" contained in these objectives and policies needs to be linked to the FNDC Long Term Plan or other funding and delivery mechanisms so that the Council can enable the District's people and communities to provide for the own social and economic well-being.	Identify in the PDP those measures that the Council will take to lead and provide for infrastructure in a timely manner that will support and enable growth.		
S165.009	6.	TRAN – Table 1 – Minimum number of parking spaces	Oppose	The NPS:UD 2020 (para 3.38) states that a Tier 3 territorial authority must change its District Plan if it contains provisions that have the effect of requiring a minimum number of car parks (except accessible car parks).	Delete TRAN – Table 1 – Minimum number of parking spaces.		
		Part 3: Area Specific Matters					
S165.010 S165.011	7.	General Residential Zone – Policies GRZ-P3 and GRZ_P5	Support	Policy GRZ-P3 appropriately seeks to enable "multi-unit developments within the General Residential Zone, including terraced housing and apartments, where there is adequacy and capacity of available or programmed development infrastructure." This enablement of a variety of different housing typologies is further reflected in Policy GRZ-P5 which specifically provides for retirement villages with four different criteria which are realistically capable of being achieved. GRZ-P5 is considered to be well framed and recognises that retirement villages are predominantly residential in nature	Uphold and retain Policies GRZ-P3 and GRZ-P5		

S165.012	#	Provision	Support/ Oppose	Reasons	Relief sought
				and are usually located within residential neighbourhoods. Retirement villages, which maintain a similar form and scale to other types of residential development, simply become another form of residential activity that contributes to the diverse needs of the community.	
	8.	General Residential Zone – Rule GRZ-R10	Support	The recognition of Retirement Villages as a Restricted Discretionary activity is supported on the basis that the restricted matters of discretion are clearly set out in the Rule at clauses (a) to (f). Additionally, retirement villages often include healthcare facilities, such as rest home and hospital level care suites, as well as commercial facilities, which may require larger, but not necessarily taller buildings. Restricted discretionary is therefore considered to be an appropriate activity class for retirement villages.	Uphold and retain Rule GRZ-R10