

Tabled 26/11

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the Whangarei District Council hearing on plan changes 82A and B  
88A – J, 109, 115, 136, 143, 144, 145, 147 & 148:  
District Plan changes: Urban & Services.

AND

IN THE MATTER of Submissions by G.O & A.M King  
(Submitter 172.1, 172.2)

WRITTEN STATEMENT OF GEOFFREY OLIVER KING  
26<sup>TH</sup> NOVEMBER 2019.

## 1.0 INTRODUCTION

- 1.1 My full name is Geoffrey Oliver King. I am an Architect & Town Planner and a Director of Designgroup Architects h + k Ltd in Whangarei. I hold the degrees of Bachelor of Architecture (B,Arch) and Bachelor of Town Planning (BTP). I am a Registered Architect (#1977); a member of the New Zealand Institute of Architects (NZIA) and a member of the New Zealand Planning Institute (NZPI).
- 1.2 I have been employed in Architecture and Planning for 40 years.
- 1.3 Our Family Trust owns a 4.0382 hectare (9.9786 acres) property at 328 Three Mile Bush Road which lies within the Urban Transition Environment. We have lived on this property for some 25 years. The land is very slightly undulating volcanic fertile land which supports an avocado orchard, and grazing for horses, cattle and sheep. Improvements include a 500m<sup>2</sup> two storied house with site coverage of 350m<sup>2</sup>, two sheds of approx. 70m<sup>2</sup> each, a bore & bore pump shed and a number of good quality dry stone walls and fences, and a set of stock yards.
- 1.4 Our land is subject to plan change LDR-R5 and LDR-R6 to which we made two submissions 172.1 and 172.2.

## 2.0 SUBMISSION POINT 172.1

- 2.1 The proposed plan change promotes a building coverage of: -  
'The coverage of all buildings does not exceed 500 sqm on any site'.  
This is similar to the existing rule in the zone.

We seek an amendment to this clause to change it to a percentage based coverage suggesting the clause be altered to: -  
'The coverage of all building on any site does not exceed 500 sqm or 20% (of the net site area) whichever is the greater'.

- 2.2 The reason for this change is to make the coverage control proportional to land area, rather than a blanket coverage that benefits the development of smaller sites but penalizes larger properties.
- 2.3 The current urban transitional environment or 'large lot residential zone' as it is now to be known, has many different sized properties. The zone typically incorporates many '10 acre lifestyle blocks', farms, and large residential properties as well as smaller sites recently subdivided under the current subdivision rules.
- 2.4 The proposed subdivision controls for this zone are unique in this District requiring that 50% of the parent block be retained in perpetuity as a balance area of rural land while the remainder of the land may be subdivided into lots with a maximum size of 2500 square metres and minimum size for sewerred allotments of 500 square metres.
- 2.5 In the Planner's report the recommendation is that the building coverage control should remain at the blanket 500 square metre site coverage. Interestingly enough this means that in the case of a 500 square metre sewerred allotment technically 100 percent building coverage of the site is possible. There are no other bulk and location controls that would over rule this. The setback requirements, if the site is more than 20 metres from a road are nil and the maximum allowable impervious area is 1000 square metres, so is an ineffective control on a small allotment.
- 2.6 The building coverage control as proposed therefore goes from one extreme to the other potentially allowing 100 percent building site coverage on a small allotment to an extremely minimal percentage building site coverage on a large allotment. Larger properties particularly those of balance areas, and existing un-subdivided rural farm properties may well require buildings of greater than 500 square metres in order to efficiently manage their properties, but this is not permitted under the current and proposed rules.( we cannot add additional buildings to our land as we have reached the 500m2 threshold and still we could do with a haybarn).
- 2.7 By way of comparison all other residential zones have a coverage control expressed as a percentage of net site area.

Low Density Residential Zone – allowed building coverage is 25% of the net site area.

Central Residential Zone – allowed building coverage is 40% of the net site area.

Medium Density Residential Zone – allowed building coverage is 45% of the net site area.

Rural land has a mixture of controls.

Rural Production Environment – allowable building coverage is 20% of the net site area.

Rural Urban Expansion Environment – there is no building coverage controls.

Rural Village Environment – there is no building coverage controls.

Rural Living Environment – site coverage is not to exceed 500m2.

- 2.8 Apart from one exception (which relates to a zone that was initially conceived at a similar time to the existing Urban Expansion Environment), where coverage controls are applied, they are all expressed as a percentage of site size.
- 2.9 We have promoted a coverage control of 20% of net site area for a number of reasons:

a) This is the same coverage as most of the rural land in the Whangarei District so existing rural properties and the rural balance areas following subdivision will all have the same permitted density of development, giving continuity throughout the District.

b) The maximum permitted lot size in the zone (other than the balance area) is 2500 square metres. A 20% coverage control would give a building coverage of 500 square metres which is the current control. As a result, the building coverage of allotments with a site area of 2500 square metres or less will not be affected by this change as the blanket 500 square metre coverage is greater than the alternative control sought of 20%. The 20% coverage control will only be of benefit to allotments greater than 2500 square metres, meaning that only the balance areas after subdivision or existing un-subdivided properties greater than 2500 square metres will benefit. These are exactly the properties our submission seeks relief for.

c) The Large Lot Residential Zone is promoted as a Low Density Zone with a rural outlook and is the Lowest Density Residential Zone in the District. It is therefore appropriate that the building coverage be the lowest of all residential zones. This will occur as at 20% building coverage it will be 5% lower coverage than the Low Density Residential Zone.

### **3.0 SUBMISSION 172.2**

3.1 The proposed plan change promotes an impervious area as: -  
'The cumulative impervious areas (including buildings) is less than 1000 square metres.  
This is similar to the existing rule in the zone.

We seek an amendment to this clause to change it to a percentage based impervious area suggesting the clause be altered to: -

'The cumulative impervious areas (including buildings) is less than 1000 square metres or 25% of net site area, whichever is the greater'.

3.2 The reason for our submission is similar to that of building coverage, to make the control proportional to land area rather than a blanket coverage that benefits the development of smaller sites but penalizes larger properties.

3.3 If the 2500 square metre allotment is again used as a benchmark the current 1000 square metre allowance for impervious area proportionally amounts to a 40% impervious area and a 1000 square metre property or smaller would be permitted to have 100% impervious area. While a large property would have a minimal percentage impervious area allowance.

3.4 Impervious area allowance are generally greater than building coverage to allow for drives, parking areas, paving areas, in addition to the buildings. On larger rural properties that would extend to surfaced farm races and accessways (which can be substantial) stock feeding pads, stock yards and loading ramps, outdoor storage pads, silage pits, wrapped hay bale storage etc.

3.5 By way of comparison, all other residential zones have an impervious area control expressed as a percentage value of net site area.

Low Density Residential Zone – allowable impervious area is 35% of net site area.

General Residential Zone – allowable impervious area is 60% of net site area.

Medium Density Zone – allowable impervious area is 65% of net site area.

On rural land where impervious areas are controlled, all controls are expressed as a percentage value of net site area.

Rural Production Environment – impervious areas aren't controlled.

Rural Urban Expansion Environment – allowable impervious area is 15% of net site area.

Rural Village Environment (Residential) – allowable impervious area is 65% of net site area.

Rural Living Environment – allowable impervious area is 15% of net site area.

- 3.6 We have promoted a 25% impervious area as being appropriate for this zone for the following reasons: -
- a) It is halfway between the lowest Residential Zone and the Rural Living Zones at 35% and 15% respectively.
  - b) Being the Lowest Density Residential Zone, it also will have the lowest impermeable area.

#### 4.0 EFFECTS

- 4.1 The effects of amendments sought for both the building coverage and impervious areas will be to align these two controls with all other zones in the District on a percentage coverage basis for the larger properties in the zone.
- 4.2 The small lots can still retain the advantage of larger coverages that the current controls allow. There will be no change for allotments of 2500 square metres or less for the building coverage control and the impervious area percentage controls will not take effect until property exceeds 4000 square metres in area.
- 4.3 The larger properties that may require, and have the area to sustain, larger areas of building coverage and impervious areas have the ability to develop proportional to their land size as is allowed in all other residential zones.

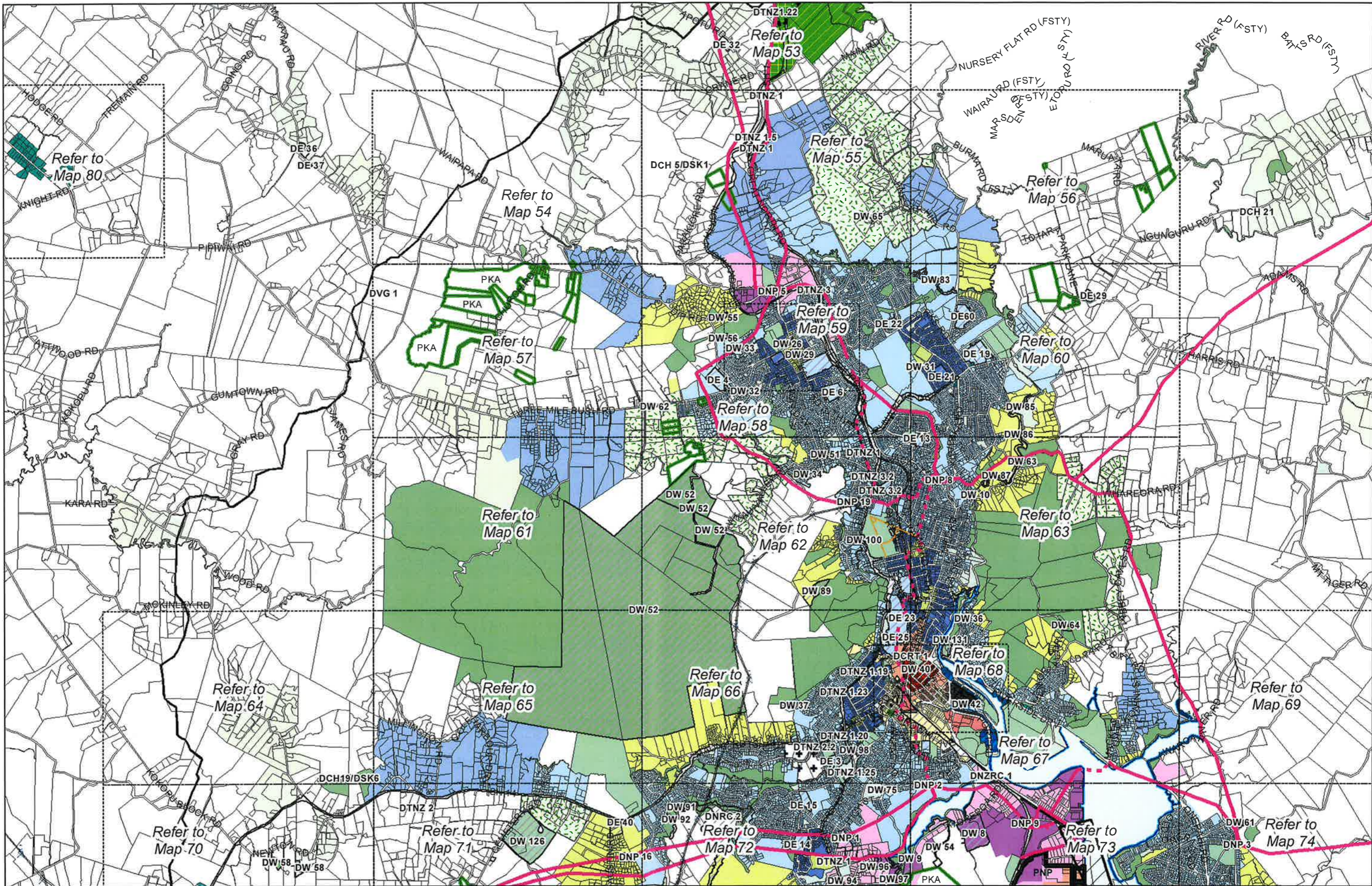
#### 5.0 RELIEF SOUGHT

- 5.1 Overturn the Planner's recommendations that our submission be declined and replace the proposed rules (or controls) with percentage based site building coverage and impervious area controls promoted in clauses 2.1 and 3.1 above..

G O King

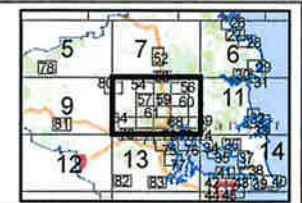
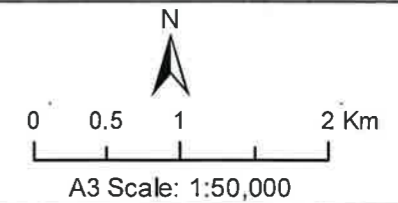
B.Arch.; B.T.P.; NZIA; MNZPI.





(C) Crown Copyright Reserved.  
 Transper New Zealand makes no representations about the suitability of any information supplied to Whangarei District Council for any purpose. All intellectual property rights in this Database layer and the data in it belong exclusively to Transper. While all reasonable efforts have been made to ensure that up-to-date information is provided to Whangarei District Council, Transper New Zealand accepts no responsibility for any errors, omissions or inaccuracies in the information.

**WHANGAREI DISTRICT COUNCIL PROPOSED PLANNING MAP**  
**Zone Map 10Z**



*Tabled 26/11.*