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## **FURTHER SUBMISSION ON PROPOSED WAIKATO DISTRICT PLAN 2018 (STAGE 1)**

### **Introduction**

This Submission is from:

Greig Developments No 2 Limited  
C/- The Surveying Company  
PO Box 466  
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The Surveying Company prepared a submission number 689 on the Proposed Waikato District Plan (PWDP) and has been engaged to prepare a further submission on the Proposed Waikato District Plan on behalf of Greig Developments No 2 Limited.

The Surveying Company is a multi-disciplinary Property Development Consultancy that has been providing Planning, Surveying and Civil Engineering services throughout the Waikato, Franklin, Papakura, Manukau and Hauraki Districts for the past 30 years. This includes the application and management of Subdivision Resource Consents and Land Use Consents associated with the use and development of land for both urban and rural activities.

Greig Developments No 2 Limited have an interest in the proposal greater than the interest that the general public has as they are considering the feasibility of developing land around Tuakau and are directly affected by the submissions identified below.

We wish to be heard at the hearing in support of this further submission. If others make a similar submission I will consider presenting a joint case with them at the hearing.

We have added further pages/sheets that form part of our further submission.

We understand that we are responsible for serving a copy of our further submission on the original submitter(s) within 5 working days after it is served on Council.

Yours faithfully

**THE SURVEYING COMPANY LTD**

Prepared by:



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Senior Planner

Reviewed by:



**LEIGH SHAW**

Planning Manager

**cc.**

Waikato Regional Council

CKL

Ports of Auckland Limited

Classic Builders Waikato Limited

Garth and Sandra Ellmers

Auckland Council

Greig Metcalfe

Waikato District Council

Russell Grey

Sharp Planning Solutions

Vineyard Road Properties Limited

Brent Trail for Surveying Services Ltd

Van den Brink Group

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Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support/ Oppose	Reasons
Waikato Regional Council	81.149	16.1.3 Restricted Discretionary Activities	Add to Rule 16.1.3 RD 1 A Multi-Unit development a new condition as follows: The development is either serviced by or within 400m walking distance of public transport.	Neutral	<p>We support the intent of this submission to encourage multi-unit development close to existing town centres with public transport links.</p> <p>However, we oppose the implication that towns without public transport links cannot have multi-unit developments for their residents. Many of the Waikato District Towns have no public transport and even if a train line passes through the town, there is no service and/station for the residents to use public transport.</p>
CKL	471.35	16.1.2 Permitted Activities	Amend Rule 16.1.2 P3 (a) Permitted Activities, to enable retirement villages on a site that has a net area less than 3ha or require resource consent at this scale. AND Any consequential amendments necessary.	Support	<p>Finding an area of land over 3 hectares in size in the Residential zone will be challenging. Retirement villages can range in their design including individual detached units, townhouses and apartment-style units in a multi-storey building.</p> <p>A minimum site size of 3 hectares will add to urban sprawl rather than provide housing intensification close to existing town centres.</p>

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support/ Oppose	Reasons
CKL	471.36	16.1.2 Permitted Activities	Amend Rule 16.1.3 RD1 (c) Restricted Discretionary Activities, so that the minimum net site area for multi-unit developments is reduced to 150m <sup>2</sup> or 200m <sup>2</sup> per residential unit based on average site area (rather than 300m <sup>2</sup> per residential unit based on net site area). AND Any consequential amendments necessary.	Support	The rule in the PWDP does not promote higher densities or compact development and will add to urban sprawl rather than housing intensification. Density should be appropriate to the physical attributes of the proposed development.
Classic Builders Waikato Limited	123.3	16.1.3 Restricted Discretionary Activities	Delete Rule 16.1.3 RD1 (c) Restricted Discretionary Activities, which requires a minimum net site area of 300m <sup>2</sup> for multi-unit development OR Amend Rule 16.1.3 RD1 (c) Restricted Discretionary Activities to reduce the minimum net site area to less than 300m <sup>2</sup> for each unit for multi-unit development.	Support	The rule in the PWDP does not promote higher densities or compact development and will add to urban sprawl rather than housing intensification. Density should be appropriate to the physical attributes of the proposed development.
Garth and Sandra Ellmers	244.4	16.1.3 Restricted Discretionary Activities	Amend Rule 16.1.3 RD1 (c) Restricted Discretionary Activities, to decrease the minimum site area required for duplexes to 200m <sup>2</sup> .	Support	The rule in the PWDP does not promote higher densities or compact development and will add to urban sprawl rather than housing intensification. Density should be appropriate to the physical attributes of the proposed development.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support/ Oppose	Reasons
Garth and Sandra Ellmers	244.5	16.1.3 Restricted Discretionary Activities	Amend Rule 16.1.3 RD1 (c) Restricted Discretionary Activities, to decrease the minimum site area required for duplexes to 200m <sup>2</sup> .	Support	Site coverage needs to be increased to allow for a reasonably sized home on smaller sites.
Ports of Auckland Limited	578.27	16.1.2 Permitted Activities	Amend Rule 16.1.2 P3 to remove retirement villages as a permitted activity within the Residential Zone. AND Amend Rule 16.1.3 Restricted Discretionary Activities, to include rules relating to new or altered retirement villages ...	Oppose	This is a site-specific submission that will have major implications on all areas of the Waikato District.
Auckland Council	372.16	16.1.3 Restricted Discretionary Activities	Amend Rule 16.1.3 Restricted Discretionary activities, as it relates to Pokeno and Tuakau ...  OR Add an alternative residential zone for Pokeno and Tuakau which provides for terraced housing.	Support	The rules in the PWDP within the residential zone will not provide for intensification of the existing urban area nor will they result in a range of housing typologies that facilitate housing choice.  Higher minimum densities than those proposed are more appropriate for established residential areas immediately adjacent to the Business Town Centre zones. Higher residential densities around this zone would better support public transport and other infrastructure, the commercial vitality of the town centre and promote people living, working and playing in their local town centres.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support/ Oppose	Reasons
Greig Metcalfe	602.46	24.1.1 Permitted Activities	Add a new rule to Rule 24.1.1 Permitted Activities for "A new retirement village or alterations to an existing retirement village" and appropriate activity-specific conditions. AND Any consequential amendments and/or additional relief required to address the matters raised in the submission.	Support	Retirement villages are appropriate land use in the Village Zone. Retirement villages do not feature as a land use activity in the village zone. Given the demand for such facilities, provision should be made for retirement villages in all urban areas, including the village zone.
Greig Metcalfe	602.47	24.2.4.1 Earthworks - General	Delete Rule 24.2.4.1 P1(a)(i) Earthworks - General. AND Delete Rule 24.2.1 P3(a)(iv) Earthworks - General. AND Any consequential amendments and/or additional relief required to address the matters raised in the submission.	Support	Earthworks within 1.5m of a boundary are inevitable and even the most minor activity, such as digging a posthole, would trigger the requirement for resource consent.
Waikato District	697.942	24.1.1 Permitted Activities	Add a new activity to Rule 24.1.1 after P8 for retirement villages.	Support	Retirement villages are appropriate land use in the Village Zone. Retirement villages do not feature as a land use activity in the village zone. Given the demand for such facilities, provision should be made for retirement villages in all urban areas, including the village zone.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support/ Oppose	Reasons
Greig Metcalfe	602.48	24.2.4.1 Earthworks - General	Delete Rule 24.2.4.1 NCI Earthworks - General. AND Any consequential amendments and/or additional relief required to address the matters raised in the submission.	Support	The importation of clean fill is provided for as a permitted activity by other rules (P2 and P3).
Russell Grey	333.1	24.3.5 Building coverage	Amend Rule 24.3.5 P2 Building Coverage, reducing the provision from 20% to 15%.	Oppose	20% allows greater flexibility in housing choice and built form. Buildings are anticipated for this zone and do not need to be further restricted by reducing the building coverage. 20% building coverage will achieve adequate low-density housing opportunities while continuing to provide a sense of open space between properties.
Sharpe Planning Solutions	695.135	24.3.5 Building coverage	Amend Rule 24.3.5 P1 and P2 to retain the operative district plan building coverage of 10% or 300m <sup>2</sup> , whichever is the larger.	Oppose	20% allows greater flexibility in housing choice and built form. Buildings are anticipated for this zone and do not need to be further restricted by reducing the building coverage. 20% building coverage will achieve adequate low-density housing opportunities while continuing to provide a sense of open space between properties.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support/ Oppose	Reasons
Vineyard Road Properties Limited	626.2	24.4.1 Subdivision – General	Amend the minimum net site area for general subdivision in the Village Zone to 2000m <sup>2</sup> , whether or not the lots are publicly reticulated; AND/OR Amend the Proposed District Plan with any necessary consequential or other relief that addresses these concerns.	Oppose	<p>Where reticulation exists, opportunities for subdivision at a higher density should prevail. A reduced minimum lot size where lots can be reticulated will provide more efficient use of both the land resource and the corresponding available infrastructure.</p> <p>The Village Zone is an <b>urban</b> environment that anticipates low-density development. A minimum lot size of 1000m<sup>2</sup> will continue to maintain open space and achieve the appropriate level of amenity.</p>



Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support/ Oppose	Reasons
Brent Trail for Surveying Services Ltd	382.7	24.4.11 Subdivision Creating Reserves	Amend Rule 24.4.11 RD1 (a) Subdivision Creating Reserves, by replacing 50% with 20%.	Oppose	<p>Rule 24.4.11 RD1(a)-Subdivision Creating Reserves should be deleted and made into a matter of discretion.</p> <p>Roading infrastructure is expensive and the rule will result in additional costs for developers which may not be justifiable from an economic perspective. The enforcement of the rule may increase the cost of development which could be passed onto purchasers. This is an arbitrary standard which may not be relevant for all reserve types or developments. Safety and surveillance of reserves may be achieved with less road frontage. There is no analysis in the s32 stating why the 50% road frontage rule has been applied. While this may be a principle to follow it should not be enforced through a rule.</p>

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support/ Oppose	Reasons
Sharpe Planning Solutions	695.139	24.4.9 Road frontage	Retain the 20m frontage as proposed in Rule 24.4.9 RD1(a) Road frontage .	Oppose	<p>The layout of development is dependent on the size and shape of the site as well as its topography (amongst other constraints). While a 20m minimum width along a road boundary can generally work in many developments that have the ability to follow a grid design, not every site is flat with no size or shape constraints. Sites with topographical natural or physical constraints may be unable to practically implement a layout that achieves 20m road frontage for all lots with the road. There may also be sites where the lay of the land is best suited to an alternative roading design. There is no analysis in the s32 regarding this relevance or practicality of this rule.</p>

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support/ Oppose	Reasons
Van den Brink Group	633.32	Maps>Zones >Industrial	<p>Amend the zoning of properties at Ryders Road and Harrisville Road, Tuakau from Industrial Zone to Business Zone (see attachment 2 to the submission).</p> <p>AND</p> <p>Rezone a portion of the property at 24 Ryders Road, Tuakau from Village Zone to Business Zone. (see attachment 2 to the submission).</p> <p>AND</p> <p>Any consequential amendments and/or additional relief required to address the matters raised in the submission.</p>	Support	Council should not zone land based solely on current land uses. The land is situated within proximity to the centre of Tuakau, where redevelopment can provide opportunities to support the residential growth projected for this area. The location of this land lends itself to commercial development opportunities such as retail, office to support an increasing population.
Van den Brink Group	633.54	Rule 20.2.1	Delete Rule 20.2.1 Servicing and hours of operation in its entirety.	Oppose	Restricting the hours of operation of businesses located in the Industrial zoned land where it adjoins Residential/Village zoned land is highly appropriate as it will assist in reducing reverse sensitivity effects between the two quite different zones. This will assist in and achieving a more appropriate level of amenity given the sensitivities between the two zones.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support/ Oppose	Reasons
Van den Brink Group	633.68	Rule 20.3.4.1 P1(ii)	Amend Rule 20.3.4.1 P1 (ii) Building setbacks to reduce the setback between sites with other zones to 3m. AND Any consequential amendments and/or additional relief required to address the matters raised in the submission.	Oppose	Providing additional buffer setbacks between sites with other zones is highly appropriate and should be at least 7.5 metres, particularly where it adjoins a Residential/Village Zone. The additional setback will assist in providing an appropriate buffer between other zones, achieving a more appropriate level of amenity given the sensitivities between the zones.