

Submission Form (Form 5)

Submission on Proposed Kaipara District Plan

Form 5: Submissions on a Publicly Notified Proposed District Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by Monday 30 June 2025 via:

Email: districtplanreview@kaipara.govt.nz (subject line: Proposed District Plan Submission)

Post: District Planning Team, Kaipara District Council, Private Bag 1001, Dargaville, 0340

In person: Kaipara District Council, 32 Hokianga Road, Dargaville; or
Kaipara District Council, 6 Molesworth Drive, Mangawhai

If you would prefer to complete your submission online, from 28 April 2025 please visit:

www.kaipara.govt.nz/kaipara-district-plan-review/proposed-district-plan

All sections of this form need to be completed for your submission to be accepted. Your submission will be checked for completeness, and you may be contacted to fill in any missing information.

Full name:

Phone:

Organisation:

*(*the organisation that this submission is made on behalf of)*

Email:

Postal address:

Postcode:

Address for service: name, email and postal address *(if different from above):*

Trade Competition

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

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

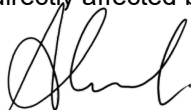
I **could** gain an advantage in trade competition through this submission.

If you have ticked this box please select one of the following:

I am directly affected by an effect of the subject matter of the submission

I **am not** directly affected by an effect of the subject matter of the submission

Signature:



Date:

(Signature of person making submission or person authorised to sign on behalf of person making the submission.)

Please note: all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

I **do not** wish to be heard in support of my submission; or

I do wish to be heard in support of my submission; and if so,

I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

(1) The specific provisions of the Proposed Plan that my submission relates to are:		(2) My submission is that: <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)</i>		(3) I seek the following decisions from Kaipara District Council. <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)</i>
Chapter/Appendix/ Schedule/Maps	objective/policy/rule/ standard/overlay	Oppose/support (in part or full)	Reasons	

Add further pages as required – please initial any additional pages

Submission on Kaipara PDP

Full Name: Phillip Ryan
Mobile: +64 9 489 9277
Address for Service: Phillip Ryan (phil.ryan@hlmedia.co.nz) and Alisa Neal (alisan@barker.co.nz)
Date: 30 June 2025
Re: Submission on Proposed Kaipara District Plan (**PDP**) – Phillip Ryan

Submission Information:

Phillip Ryan (**Ryan**) could not gain an advantage in trade competition through this submission.

The specific provisions of the PDP that Ryans submission relates to are attached.

Ryan opposes, supports and seeks amendment to the specific provisions as listed in the attached document.
The reasons are provided in the attached document.

The decisions that Ryan wishes Kaipara District Council (**KDC**) to make to ensure the issues raised by Ryan are dealt with are also contained in the attached document.

Ryan wishes to be heard in support of this submission.

If others make a similar submission, Ryan will consider presenting a joint case with them at a Hearing.

Phillip Ryan

1.0 Introduction

1.1 Ryan Interests in the Kaipara District

Ryan has an interest in the following property located within the Kaipara District:

- 35 Black Swamp Road, Mangawhai legally described as Lot 1 DP 74423 measuring approximately 1.1092ha.

Notwithstanding these specific property interests, Ryan is interested in the direction of PDP as it applies to the wider Kaipara District, and in particular the Mangawhai catchment which has a unique opportunity for harnessing unprecedented growth to create a vibrant coastal settlement on the doorstep of Auckland.

1.2 PDP Submission Structure

This submission on the PDP addresses appropriate zoning and provisions for the Black Swamp Road Area. The abovementioned site has been zoned General Rural Zone in the PDP and located within the proposed 'Mangawhai/Hakaru Managed Growth Area'.

Ryan seeks a zoning that better reflects the rural residential nature of the development that has been recently consented within the Black Swamp Road Area, the existing surrounding cadastral pattern of development and the demand for growth in the locality.

The following submission is set out as follows:

- **Section 2.0** provides Site Context and Background.
- **Section 3.0** contains general comments on the PDP zoning at both sites and identifies the zoning Ryan seeks and how/why relevant provisions should be improved to more efficiently and effectively achieve the proposed objectives of the Plan, and the purpose of the RMA.
- **Attachment 1** identifies the specific change sought to provisions.

2.0 Site Context and Background

The sites are zoned Rural Zone under the Operative Kaipara District Plan (ODP), and subject to the Mangawhai Harbour Overlay.



Figure 1 ODP zoning of Black Swamp Area. Green – Rural Zone, Hatch – Mangawhai Harbour Overlay

Figure 1 above shows a clear pattern of rural residential development within the Black Swamp Road Area, with the subject site being one of the last remaining larger lot surrounded by lifestyle development.

As shown in **Figure 2** below, the proposed zoning for the wider Black Swamp Area is 'General Rural Zone', with coastal and flood hazards and the proposed Coastal Environment extending along the harbour edge. The subject site is proposed to be zoned (**GRUZ**) with a small portion subject to the proposed Flood Hazard 10 and 100 year extent and Coastal Flood Hazards current, 50 year and 100 year extents.

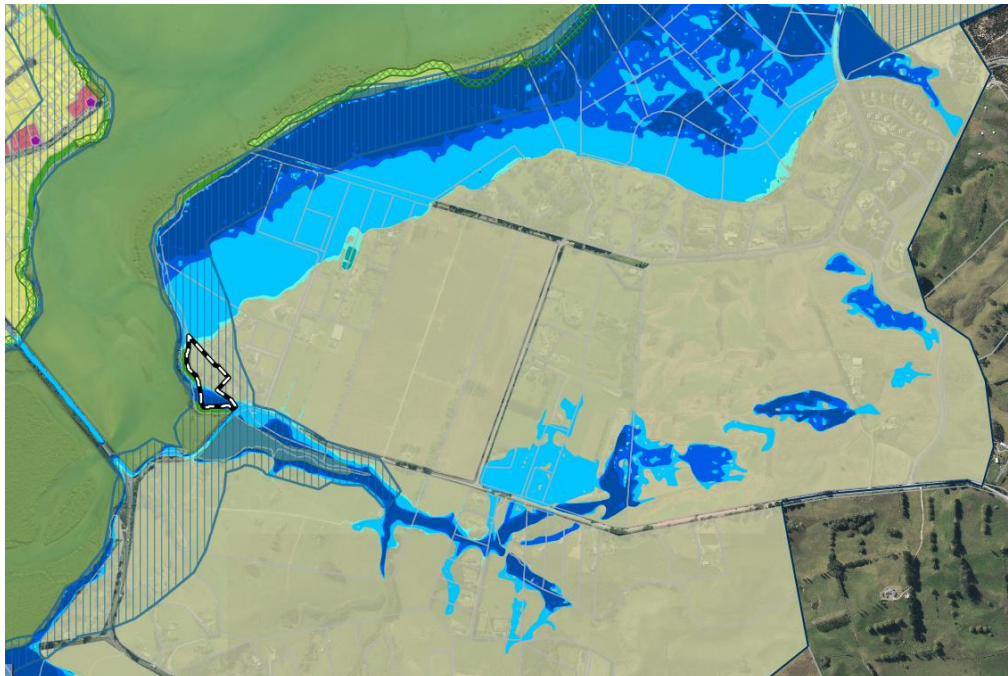


Figure 2 – Subject sites, with green indicating General Rural Zone, blue indicating Flood Hazard.

3.0 General Feedback

3.1.1 National Direction

Section 75(3)(a) of the RMA states that a district plan must “give effect” to a national policy statement. Ryan considers that the PDP in its current form, fails to “give effect” to the following national policy statements:

- (a) National Policy Statement on Urban Development (**NPS-UD**): In MPDL’s submission, Mangawhai clearly meets the threshold to be considered a “urban environment”¹ in accordance with the definition in the NPS-UD. Despite overwhelming evidence demonstrating this, KDC have essentially made its own decision that the NPS-UD does not apply to the Kaipara District, and therefore conclude that the NPS-UD does not therefore have to be given effect to in the PDP.² Despite this, KDC have assessed the NPS-UD, and concluded that the PDP gives effect to it without any specific assessment of the relevant provisions. As such, NHL consider that the PDP has been promulgated in the absence of confirmation of how it gives effect to relevant provisions³, especially as it relates to the Mangawhai-Hakuru Managed Growth Area which is addressed further below.
- (b) National Policy Statement on Highly Productive Land (**NPS-HPL**): the proposed zoning framework under the PDP does not give effect to the direction in the NPS-HPL regarding the protection of highly productive soils. The application of the GRUZ has been applied incorrectly to existing or planned areas of rural-residential / lifestyle development.

Ryan notes that Central Government is currently undertaking consultation on future changes to National Policy Statements, in particular changes to the NPS-HPL and the removal of LUC 3 from the definition of HPL. The new and amended direction is intended to be in force before the end of 2025. Ryan seeks that any necessary changes are made throughout the PDP process to ensure that the new direction is adequately given effect to in the PDP provisions.

3.1.2 Northland Regional Policy Statement

Section 75(3)(b) of the RMA states that a district plan must “give effect” to a regional policy statement. Ryan considers that the PDP in its current form, fails to “give effect” to the Regional Policy Statement for Northland (**RPS**), and in particular the following:

- (a) Objective 3.5 Enabling economic wellbeing: the PDP does not manage Kaipara’s resources in a way that is attractive for business and investment that will improve Northland wellbeing. In particular the Mangawhai-Hakarau Managed Growth Area (addressed further below) unnecessarily restricts further growth and development within the Mangawhai area, which is the fastest growing part of the district with the most demand for further growth.

¹ “Urban environment means any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:

- a) Is, or is intended to be, predominantly urban in character; and
- b) Is, or is intended to be, part of a housing and labour market of at least 10,000 people.”

² See paragraph 178 – 181 of the Kaipara DP Review – Section 32 Overview Report.

³ In particular, Objectives 1, 3, 4, 6 and Policies 1, 2 and 6.

- (b) Objective 3.6 Economic activities – reverse sensitivity and sterialisation and Policy 5.1.3 Avoiding the adverse effects of new use(s) and development: the PDP zoning framework, and in particular the application of the GRUZ, is such that the rural environment is not adequately protected from the negative impacts of new subdivision use and development and reverse sensitivity effects are not avoided.
- (c) Objective 3.11 Regional form and Policy 5.1.1 – planned and coordinated development: the zoning framework within the PDP is narrow, and does not enable the effective integration of infrastructure with subdivision, use and development, and promote a sense of place and range of lifestyle options. More specifically the broad and inappropriate application of the GRUZ means that rural residential / lifestyle development in existing areas is unnecessarily constrained. This fails to ensure the protection of soil-based primary production and does not maintain or enhance the sense of place and character of the surrounding environment.

3.1.3 Mangawhai Structure Plan

The Mangawhai Structure Plan adopted in 2020 (**MSP**) includes an overall plan of the growth for Mangawhai. The MSP identifies the Black Swamp Area and the subject site as future rural residential (lifestyle) areas (refer to **Figure 3**). The PDP fails to give effect to or implement the MSP.

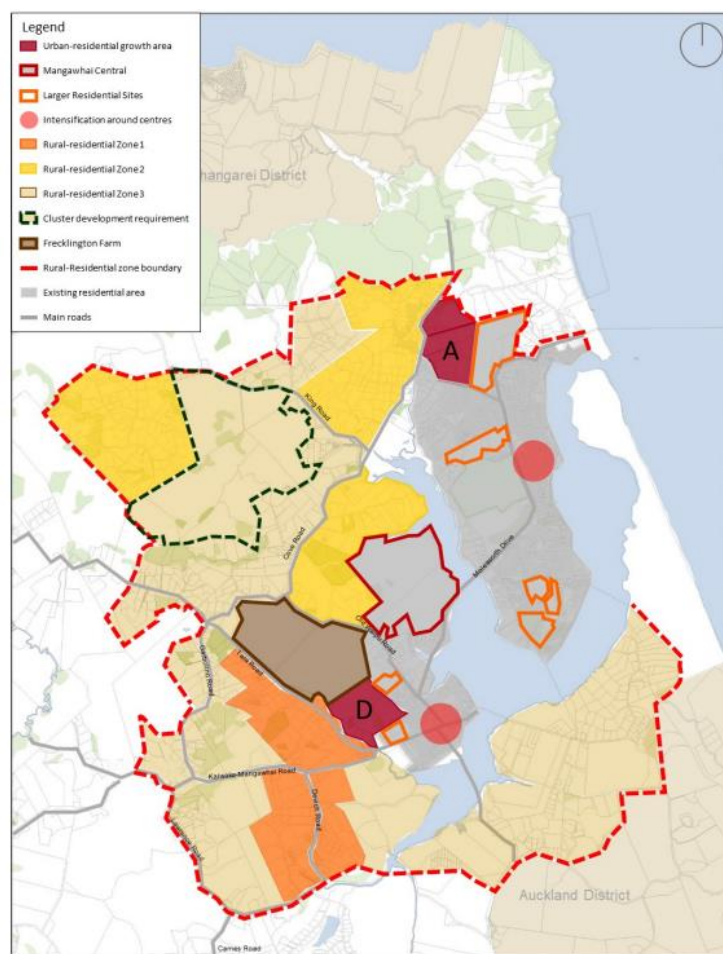


Figure 3 – Mangawhai Structure Plan.

The MSP (which is a strategic planning document) within the ODP is a 'Rural – Residential' growth area which anticipates urban development with a minimum 4000m² allotment size. When compared to the National Planning Standard definition of each zone, this anticipated lot size is akin to a Large Lot zone.

3.2 Strategic Direction

The Strategic Direction Chapter (**SD Chapter**) is fundamental to the tone and direction of the PDP. As a general comment, there is a degree of disconnect between the objectives and policies set in the SD chapter and the outcomes sought through the provisions within the plan, particularly in regard to the rural environment.

Ryan notes that the Vision for Kaipara section of the SD Chapter generally seem to acknowledge the need to enable growth where this does not adversely impact the district's highly productive land (**HPL**) resource or rural production activities. However, it is unclear how this translates to the narrow zoning approach taken around Mangawhai and the inclusion of the Mangawhai/Hakaru Managed Growth Area which limits new subdivision development in the part of the district where there is the most demand for growth, and rural production activities are already limited in large parts due to the existing and consented cadastral pattern and limited HPL.

This disconnect is further exacerbated through the absence of targeted strategic direction for the rural environment making it even less clear how the PDP zoning around the wider Mangawhai environment is meant to achieve the Vision for Kaipara objectives.

Ryan has general concerns that the Strategic Direction chapters are inconsistent, some chapters contain objectives for each topic, and not policies, whilst others contain both objectives and policies. In MPDL's view, the objectives need policies to demonstrate how they are going to be achieved in the Plan. It is also important at this strategic level of the PDP, that the policies provide clear direction for the consideration of resource consents where there is conflict between different areas of strategic direction.

The Strategic Direction section includes a Vision for Kaipara chapter which includes the only strategic direction for the Rural Area (SD-VK-O3 and SD-VK-O4) with no policy direction. The Strategic Direction section includes an Urban Form and Development chapter with limited policy direction as to the purpose and criteria of each zone proposed. There is no identification of small, medium or large centres, or rural/coastal settlements versus large towns. Ryan considers that this a flaw in the structure of the Strategic Direction, which flows through to lack of policy direction throughout the PDP.

The Strategic Direction, Urban Form and Development chapter includes policy SD-UFD-P7 directing development in the Mangawhai-Hakaru Managed Growth Area. Ryan has been unable to confirm from Council s32 reports how this managed growth area has been spatially identified, what the purpose or justification for the managed growth area is other than to "manage growth with provision of suitable infrastructure"⁴.

The intent of an SD Chapter is to set an overarching umbrella framework that should guide the remainder of the PDP cementing the intended outcomes for the district for the proceeding years. The SD Chapter in its current form fails to achieve this, and as a result the integration between the chapters is confused. If

⁴ General Section 322 Overview Report, paragraph 113.

retained as proposed, this could result in unintended outcomes for the district and a weak framework which can readily be eroded.

3.3 Zoning

In terms of the notified zones and provisions, Ryan does not support the proposed rezoning of their site to GRUZ. The PDP does not provide alternative rural residential or large lot residential zones providing only a General Residential Zone (**GRZ**). Ryan is unable to understand why Council has chosen to only use one residential zone being the GRZ. The National Planning Standards provide a range of residential zones, which could be utilised:

- Large Lot Residential Zone
- Low Density Residential Zone
- Medium Density Residential Zone
- Large Format Retail Zone
- Rural Lifestyle Zone

Council released a draft District Plan which included a larger range of residential zones, the option of providing a three zone model was disregarded by the Council s32 Evaluation on the grounds that it was “overly complicated”. Ryan considers that the s32 evaluation has failed to undertake a complete analysis of the efficiency and effectiveness of the zone proposed and does not consider the most appropriate zoning options for the Black Swamp Road area.

The application of the GRUZ to the sites and the Black Swamp Road area is problematic the existing and consented cadastral pattern undermines the clear intent of the GRUZ, which as defined in the National Planning Standards primarily seeks to support primary production activities. The dishonest zoning sends a confused message to plan users in terms of the expected outcomes for the GRUZ zone in this location eroding the intent.

In an attempt to align with SD Chapter and provide for a variety of lifestyle choices and economic and social wellbeing generally in the rural environment across the district, the GRUZ and Subdivision Chapter includes rules⁵ that instead will likely result fragmentation of the very resource the zone seeks to protect.

Ryan considers that the most efficient and effective way to achieve alignment with the SD Chapter, National Direction and market demand is to protect land that has remaining productive intent by providing for a variety of housing and lifestyle options though intensification of areas adjacent to urban centre that can no longer accommodate rural production type activity.

⁵ Including GRUZ-R13, SUB-R3, and SUB-R4.

3.4 Mangawhai/Hakaru Managed Growth Area

The Mangawhai/Hakaru Managed Growth Area (**Managed Growth Area**) presents as a 'site specific control' in the PDP. The associated direction is located within the SD Chapter⁶ and the Subdivision Chapter⁷ which explain the intent of the overlay to limit subdivision to ensure infrastructure can be appropriately directed. As proposed, subdivision to create new allotments of 12ha or more within the Managed Growth Area is a discretionary activity⁸, small lot subdivision is a non-complying activity⁹.

The Managed Growth Area was not included in the Draft Kaipara District Plan as previously stated, the Council Section 32 does not clearly state how this managed growth area has been spatially identified, what the purpose or justification for the managed growth area. According to the proposed PDP maps it applies to a large area surrounding Mangawhai and is a vast difference from the zoning pattern previously supported by Council in both the Mangawhai Spatial Plan and the Draft KDP. This combined with the lack of option analysis provided suggests the Managed Growth Area is an afterthought to address Councils infrastructure concerns for Mangawhai.

Ryan strongly opposes the application of the Managed Growth Area to the rural environment surrounding Mangawhai and seek that it is removed or refined. Ryan understands the need to carefully control urban growth to ensure council infrastructure is not placed under undue pressure. However, Ryan highlights that rural residential and lifestyle type development is typically required to provide for onsite three water servicing meaning no additional pressure on Councils three water infrastructure. Development pressures on roading and social infrastructure are addressed through Councils' Development Contributions Policy and Financial Contributions Chapter of the PDP.

The demand for growth and rural lifestyle/residential living surrounding Mangawhai is evident, the Managed Growth Area severely limits the opportunities to realise this in the part of the district with the most ability to generate contributions. Ryan considers that the provisions are a blunt and unnecessary approach that will severely detract investment and growth and unfairly restrict the ability of landowners affected to provide for their economic wellbeing.

4.0 Conclusion

In conclusion, Ryan seeks the following relief:

- (a) Ryan's general feedback in Section 2.0 and specific feedback in **Attachment 1** is addressed and necessary changes incorporated into the PDP.
- (b) Zone the properties located along Black Swamp Road (the 'Black Swamp Road Area') Large Lot Residential zone similar to the Large Lot Residential Zone proposed in the Draft District Plan, which reflects the current cadastral pattern and land use or

⁶ SD-UFD-P7

⁷ SUB-P12

⁸ SUB-R3.11

⁹ SUB-R4.4

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- (c) Zone the properties located along Black Swamp Road (the 'Black Swamp Road Area') a Special Purpose Rural Residential Zone which reflects the current cadastral pattern and land use.
- (d) Any further necessary consequential amendments required to achieve (a) – (c) above.

Ryan looks forward to working collaboratively with KDC to address the above relief and is happy to meet with KDC policy staff or consultants to work through these matters.

Submission on Kaipara PDP

Attachment 1: Specific Submission Points on PDP

Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
HOW THE PLAN WORKS – RELATIONSHIP BETWEEN SPATIAL LAYERS				
1	Spatial Layers	Seek amendment	Ryan notes that the spatial layers listed does not include reference to Precincts nor does it reference the proposed Mangawhai/Hakaru Managed Growth Area.	Amend the section as necessary to provide clarity for the plan user.
2	Spatial Layers	Seek amendment	Ryan notes that the provisions do not provide any direction for split zoned sites.	Amend the section as necessary to provide clarity for the plan user and be clear that provisions apply only to the extent of the mapped area.
STRATEGIC DIRECTION – VISION FOR KAIPARA CHAPTER				
3	SD-VK O1	Support	Ryan supports the intent of this objective being to promote social, economic and cultural wellbeing through providing for appropriate activities and outcomes in the zones.	Retain as notified.
4	SD-VK O4	Support	Ryan supports this objective and the directive to provide for growth in appropriate areas whilst protecting HPL and primary production activities.	Retain as notified.
5	SD-VK - O7	Support	Ryan supports providing for a variety of development opportunities and living/housing options through a range of zones.	Retain as notified.

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STRATEGIC DIRECTION – URBAN FORM AND DEVELOPMENT CHAPTER				
6	SD-UFD-O5	Support	Ryan supports consolidation and integration of future growth.	Retain as notified.
7	SD-UFD-P1	Support	Provision of sufficient development capacity is consistent with the NPS-UD.	Retain as notified.
8	SD-UFD-P7	Oppose	Provision of infrastructure and services can be provided to meet the requirements of urban areas without applying an arbitrary spatial limitation. SD-UFD-P1 is inconsistent with FC-O1.	Delete SD-UFD-P7.
SUBDIVISION				
9	SUB-O2	Oppose	As proposed SUB-O2 urban subdivision applies to all subdivision <u>within</u> urban zones, which include commercial, light and heavy industrial zones. It is considered that this objective as proposed is too narrow to accommodate all types of subdivision in all urban zones. For example, Clause 1 requires subdivision to be sympathetic to the context and characteristics of the site and clause 5 requires the contribution to creating a sense of place these may be extremely limiting, particularly if a site has been appropriately zoned for Light or Heavy Industrial. Clause 3 seeks to consolidate urban development	Delete SUB-O2.

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			which is completely unnecessary as the spatial distribution of zoning has already been identified based upon consolidation.	
10	SUB-P1	Delete	SUB-P1 outlines general subdivision design and location outcomes, which apply to all zones. Clause 1 seeks the incorporation of and response to existing site features and characteristics, including landforms, vegetation, buildings and cultural and amenity values. Again, it is considered that this policy is too narrow when applied to all zones, particularly those zones which have a lower level of amenity and are expected to have a high level of modification such as the commercial, light and heavy industrial zones. Not all vegetation should be incorporated in a subdivision design and it is considered that the Natural Environmental Values provisions afford sufficient protection.	Delete SUB-P1.
11	SUB-P2	Seek amendment	SUB-P2 details infrastructure servicing requirements for all zones, this policy has been framed with a narrow lens, it fails to consider practical onsite solutions for servicing nor does it provide for servicing of the Rural Living Zone.	Amend SUB-P2 as follows: Ensure that subdivision and development is appropriately serviced, and that infrastructure is provided in an integrated and coordinated manner, by: <ol style="list-style-type: none">1. Ensuring infrastructure networks have sufficient capacity to accommodate the additional development, and

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				<p>requiring any necessary upgrades to be completed at the time of subdivision;</p> <p>2. Requiring any staging of subdivision to be undertaken in a way that achieves efficient development and integration of infrastructure;</p> <p>3. Requiring infrastructure to be installed at the time of subdivision, except for on-site infrastructure that cannot be determined until the allotment is developed;</p> <p>4. Requiring allotments <u>within an area of benefit</u> to connect to the Council's reticulated systems where practicable, except in the General rural zone;</p> <p>5. Requiring legal and physical access to be provided to each allotment; and</p> <p>6. Requiring allotments to have access to a suitable water supply.</p>
12	SUB-P6	Delete	Ryan does not support the limitation of develop based upon the proposed Mangawhai/Hakaru Managed Growth Area. For reasons previously discussed this is an arbitrary area with no s32 justification. Limitation of subdivision with the GRZ is not efficient not effective.	Delete SUB-P6 and replace with new policies which reflect appropriate subdivision within each urban zone.
13	SUB-P7	Seek amendment	Clause 3 of SUB-P7 seeks to avoid the creation of undersized lost to ensure	Amend SUB-P7 as follows:

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			that the outcomes of the zone are not undermined. It is considered that this policy as worded is not efficient and effective.	Provide for subdivision that enables appropriate land use activities to occur in the Rural lifestyle zone by: <ol style="list-style-type: none"> 1. Maintaining Requiring subdivision to meet the minimum lot sizes and suitable dimensions for lots to achieve the character, amenity values and density anticipated in the Rural lifestyle zone; 2. Avoiding subdivision around minor residential units; and 3. Avoiding the creation of undersized lots in the Rural lifestyle zone to ensure the function and desired outcomes for the zone are not undermined an urban form and uniform development patterns.
14	SUB-P8	Delete	Ryan does not support the limitation of develop based upon the proposed Mangawhai/Hakaru Managed Growth Area. For reasons previously discussed this is an arbitrary area with no s32 justification. Limitation of subdivision with the GRZ is not efficient not effective.	Delete SUB-P6 and replace with new policies which reflect appropriate subdivision within each urban zone.
15	SUB-P12	Delete	Ryan does not support the limitation of develop based upon the proposed Mangawhai/Hakaru Managed Growth Area. For reasons previously discussed this is an arbitrary area with no s32 justification. Limitation	Delete SUB-P12

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			of subdivision with this area is not efficient not effective. Furthermore, proposed policy SUB-P2 subject to appropriate amendments will manage provision of infrastructure.	
16	SUB-R3	Seek amendment	Ryan does not support the limitation of develop based upon the proposed Mangawhai/Hakaru Managed Growth Area. For reasons previously discussed this is an arbitrary area with no s32 justification. Limitation of subdivision with this area is not efficient not effective.	Delete rules 11 and 12.
Zoning				
17	Zoning Black Swamp Road area including the Ryan site.	Seek amendment	<p>Ryan is opposed to the proposed zoning of this area GRUZ for the following reasons:</p> <ul style="list-style-type: none"> a) The properties located within this area are consistent with the intended purpose of the GRZ. b) The character and amenity of this area is consistent with a large lot residential zone, establishing a coherent peri-urban pattern and character to Mangawhai. c) These properties do not fit with the proposed zone purpose of the GRUZ. d) The proposed GRUZ fails to enable sustainable use and 	<ul style="list-style-type: none"> a. Zone the properties located along Black Swamp Road 'Large Lot Residential zone' similar to the Large Lot Residential Zone proposed in the Draft District Plan, which reflects the current cadastral pattern and land use or b. Zone the properties located along Black Swamp Road a 'Special Purpose Rural Residential Zone' which reflects the current cadastral pattern and land use.

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			<p>development of the properties within this area.</p> <p>e) The purpose of a large lot residential zone is predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development. Given the location, coastal interface and natural hazards in the wider Black Swamp area this it is considered that this zone appropriately reflects the character and amenity of the Black Swamp Road area.</p> <p>f) The Section 32 Rural Zones does not provide any further zone criteria, nor does it provide any justification or evaluation of the extent or zone, rather appears to follow an arbitrary cadastre boundary.</p> <p>g) This area is rural residential in character, developed for residential purposes containing existing residential activities,</p>	
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Submission on Kaipara PDP

			<p>the land is fragmented with existing allotment sizes between 2000m² and 2ha.</p> <p>h) It is considered that the area is materially compromised for rural production activities due to the existing fragmentation and potential for reverse sensitivity effects.</p>	
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