

Started on 15 December 2025 at 11:42am | Completed on 15 December 2025 at 1:57pm

## Form 6

### Further submission in support of, or in opposition to, submission/s on the notified Proposed Kaipara District Plan

*Clause 8 of Schedule 1, Resource Management Act 1991*

This is a further submission that is either **in support of** or **in opposition to** a submission already received by Kaipara District Council on all topics except for the topic of Light in the Proposed Kaipara District Plan.

No new submission points can be made.

The topic of Light was notified for further submissions on 21 October 2025 prior to all other topics due to the hearing for Light being confirmed for December 2025.

- This Form 6 is available for further submissions on all Proposed Kaipara District Plan topics except for Light. The topic of Light was notified for Further Submissions between 21 October 2025 and 4 November 2025 as a hearing for this topic is being held in December 2025.
- **PRIVACY ACT NOTE:** Please note that all information provided in your further submission is considered public under the Local Government Official Information and Meetings Act 1987 and may be published to progress the process for the Proposed Kaipara District Plan and may be made publicly available.
- I understand that information provided in my submission may be published. \*  
1A
  - Yes
  - No
- **Use this page to provide your contact details and indicate your preferences regarding hearings.**

- Please provide your details: \*

2A

**Your  
initial/s  
and last  
name**

Shaun Huband

**Your  
postal  
address  
(including  
Post  
Code)**

2088 Paparoa Valley Road,

**Contact  
phone  
number**

0212220272

- Enter your email address:

2B

shaun@huband.co.nz

- Do you have an agent who is acting on your behalf?

2C

- Yes  
 No

- Email address for Agent

2D

rayya@easdale.nz

- We prefer to contact you by email, as it's faster and more reliable than post.  
2E However, we're happy to use whichever method suits you best — please select your preferred contact method below: \*

- Email  
 Postal

- Correspondence is to be sent to: \*

2F

- Submitter (you)  
 Agent  
 Both

- I am (select one of the following options): \*

2G

- a person representing a relevant aspect of the public interest
  - a person who has an interest in the proposal that is greater than the interest the general public has
  - the local authority for the relevant area
- You must specify the grounds for saying that you come within this category (see **2H** examples below if you need assistance): \*

I am the owner and operator of Huband Contractors, which operates from the property at 2088 Paparoa Valley Road, Kaipara. My interest in both the property and this submission is direct, substantial, and materially greater than that of the general public in relation to the proposal.

- *For example: Any person representing a relevant aspect of the public interest would likely include public interest environmental groups*

OR

*Any person that has an interest in the proposed policy statement or plan greater than the interest that the general public has is likely to include owners of land and users of resources directly affected by plan provisions. It is also likely to include iwi and hapu where their interests are directly affected*

- I wish to be heard in support of my further submission \*  
**2I**
  - Yes
  - No
- If others make a similar further submission, I will consider presenting a joint case  
**2J** with them at the hearing \*
  - Yes
  - No
- Council planners have summarised all original submissions and each original submission has a unique reference number, listed below in the Summary of Submissions link below - original submitters may have lodged more than one submission - ensure you carefully enter the correct submission details when you get to the Submission questions!.
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- **Instructions:**

1. Enter the **Original Submitter's Name** and the **Submission Point Number** you are further submitting on.  
*Ensure accuracy—incorrect details may result in your submission being rejected.*
2. After completing questions 3B–3E, you can add up to **19 more further submissions** on this form.
3. If you need to make more than 20 further submissions, **start a new form**.

- Enter the name of the person or organisation who made the original submission  
**3A** that you are further submitting on: \*

Kaipara District Council

- Enter the exact submission point number that you are further submitting on  
**3B** (incorrect numbers may cause your submission to be rejected):

222.60

FS28.1

- I support/oppose (tick applicable) the original submission of the submitter: \*  
**3C**
  - I support this original submission point of the submitter named above
  - I oppose this original submission point of the submitter named above

- **Clearly explain below why you support or oppose the original submission point:**

1. Keep your explanation **brief** and ensure you give clear reasons for why you are supporting or opposing the original submission.
2. If you would like to upload any documentation to support your submission - you can do this in the next question.
3. **Important:** Do **not** introduce new submission points - only enter your reasons for supporting or opposing the original submission point.

- The reasons for my support/opposition are: \*  
**3D**

Oppose - the site is currently used by Huband Contractors for light industrial activities. They are in the process expansion to the neighboring sites. Changing the zoning of this property to commercial does not align with the current and future use of the site. It does not provide an enabling framework for Hubands Industrial operations and reflect the real use of the site. Light Industrial Zone is considered more appropriate for this site.

- Do you have any attachments that relate directly to your Further Submission that  
3E you would like to upload? \*

Yes

No

- Upload the file/s you wish to attach here:

3F

- [2088 Paparoa Valley Road - Submission to Proposed Kaipara District Plan.pdf](#)

- Do you have another further submission to make? \*

3G

Yes

No

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- Enter the name of the person or organisation who made the original submission  
4A that you are further submitting on: \*

Bradley Knight

- Enter the exact submission point number that you are further submitting on  
4B (incorrect numbers may cause your submission to be rejected):

72.1

- I support/oppose (tick applicable) the original submission of the submitter: \*  
4C
  - I support this original submission point of the submitter named above
  - I oppose this original submission point of the submitter named above

- **Clearly explain below why you support or oppose the original submission point:**

1. Keep your explanation **brief** and ensure you give clear reasons for why you are supporting or opposing the original submission.
2. If you would like to upload any documentation to support your submission - you can do this in the next question.
3. **Important:** Do **not** introduce new submission points - only enter your reasons for supporting or opposing the original submission point.

- The reasons for my support/opposition are: \*  
4D

Oppose in Part - This submission by Mr Bradley Knight supporting the proposed rezoning of land to Rural Lifestyle zone includes the site at 2088 Paparoa Valley Road.

We have requested this site to be excluded from Rural Lifestyle Rezoning and proposed to have rezoned as Light Industrial Zone.

- Do you have any attachments that relate directly to your Further Submission that you would like to upload? \*  
4E
  - Yes
  - No

- Upload the file/s you wish to attach here:  
4F

- [2088 Paparoa Valley Road - Submission to Proposed Kaipara District Plan.pdf](#)

- Do you have another further submission to make? \*  
4G
  - Yes
  - No

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- Enter the name of the person or organisation who made the original submission **5A** that you are further submitting on: \*

Christopher Rea

- Enter the exact submission point number that you are further submitting on **5B** (incorrect numbers may cause your submission to be rejected):

79.1

FS28.3

- I support/oppose (tick applicable) the original submission of the submitter: \* **5C**
  - I support this original submission point of the submitter named above
  - I oppose this original submission point of the submitter named above

- **Clearly explain below why you support or oppose the original submission point:**

1. Keep your explanation **brief** and ensure you give clear reasons for why you are supporting or opposing the original submission.
2. If you would like to upload any documentation to support your submission - you can do this in the next question.
3. **Important:** Do **not** introduce new submission points - only enter your reasons for supporting or opposing the original submission point.

- The reasons for my support/opposition are: \* **5D**

Oppose in Part - The submitter has made a submission to retain the proposed Rural lifestyle zoning of the Paparoa/Pahi area. However, this also includes the property at 2088 Paparoa Valley

Road owned and operated by Huband Contractors.

We oppose this submission in part and request the site at 2088 Paparoa Valley Road and the immediate adjacent property at 2074 and 2078 is rezoned to Light Industrial Zone as it better aligns with the current activities as well as future objective of the

- Do you have any attachments that relate directly to your Further Submission that you would like to upload? \*  
5E

Yes

No

- Upload the file/s you wish to attach here:

5F

- [2088 Paparoa Valley Road - Submission to Proposed Kaipara District Plan.pdf](#)

- Do you have another further submission to make? \*

5G

Yes

No

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3. If you need to make more than 20 further submissions, **start a new form**.

- Enter the name of the person or organisation who made the original submission that you are further submitting on: \*  
6A

P Hames & L Jones

- Enter the exact submission point number that you are further submitting on  
6B (incorrect numbers may cause your submission to be rejected):

FS28.4

201.1

- I support/oppose (tick applicable) the original submission of the submitter: \*  
6C
  - I support this original submission point of the submitter named above
  - I oppose this original submission point of the submitter named above

- **Clearly explain below why you support or oppose the original submission point:**

1. Keep your explanation **brief** and ensure you give clear reasons for why you are supporting or opposing the original submission.
2. If you would like to upload any documentation to support your submission - you can do this in the next question.
3. **Important:** Do **not** introduce new submission points - only enter your reasons for supporting or opposing the original submission point.

- The reasons for my support/opposition are: \*  
6D

P Hames and L Jones have made submissions seeking to rezone the property at 2088 Paparoa Valley Road to a Commercial Zone. While the rationale for this submission is understood, a Light Industrial Zone is considered more appropriate for the site than a Commercial Zone.

Huband Contractors has lawfully operated from this property for an extended period, undertaking activities that align more closely with the purpose, scale and anticipated effects of a Light Industrial Zone rather than a Commercial Zone. Rezoning the site to Light Industrial would better reflect the existing and established use of the land, provide for operational certainty and consistency with the District Plan's zoning framework and intent.

- Do you have any attachments that relate directly to your Further Submission that  
6E you would like to upload? \*
  - Yes
  - No

- Upload the file/s you wish to attach here:  
6F

- [2088 Paparoa Valley Road - Submission to Proposed Kaipara District Plan.pdf](#)

- Do you have another further submission to make? \*

6G

- Yes
- No

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- Enter the name of the person or organisation who made the original submission **7A** that you are further submitting on: \*

P Hames & L Jones

- Enter the exact submission point number that you are further submitting on **7B** (incorrect numbers may cause your submission to be rejected):

201.2

FS28.5

- I support/oppose (tick applicable) the original submission of the submitter: \* **7C**

- I support this original submission point of the submitter named above
- I oppose this original submission point of the submitter named above

- **Clearly explain below why you support or oppose the original submission point:**

1. Keep your explanation **brief** and ensure you give clear reasons for why you are supporting or opposing the original submission.
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- The reasons for my support/opposition are: \*  
7D

P Hames and L Jones have made a submission seeking to retain the Rural Lifestyle zoning changes around the Paparoa area. However, this submission also includes the site at 2088 Paparoa Valley Road.

We oppose the inclusion of 2088 Paparoa Valley Road within this submission and request that the site be excluded. It is sought that the subject site be rezoned to Light Industrial, rather than retained as Rural Lifestyle or rezoned to Commercial. A Light Industrial zoning more accurately reflects the existing and established use of the site and provides a more appropriate planning framework for its ongoing operation.

- Do you have any attachments that relate directly to your Further Submission that you would like to upload? \*  
7E

- Yes
- No

- Upload the file/s you wish to attach here:  
7F

- [2088 Paparoa Valley Road - Submission to Proposed Kaipara District Plan.pdf](#)

- Do you have another further submission to make? \*  
7G

- Yes
- No

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- Enter the name of the person or organisation who made the original submission **8A** that you are further submitting on: \*

M Baker

- Enter the exact submission point number that you are further submitting on **8B** (incorrect numbers may cause your submission to be rejected):

324.7

FS28.6

- I support/oppose (tick applicable) the original submission of the submitter: \* **8C**
  - I support this original submission point of the submitter named above
  - I oppose this original submission point of the submitter named above

- **Clearly explain below why you support or oppose the original submission point:**

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- The reasons for my support/opposition are: \* **8D**

Support - We support the submission that considers the Rural Lifestyle zoning of Hubands Contracting at 2088 Paparoa Valley Road, Paparoa to be incorrect.

### Decision Sought

Rezone the site at 2088 Paparoa Valley Road to Light Industrial, as this zoning more accurately reflects the existing and established use of the land and provides an appropriate planning framework for the continued operation of Hibanda Contracting

- Do you have any attachments that relate directly to your Further Submission that you would like to upload? \*  
8E



- Yes
- No

- Upload the file/s you wish to attach here:  
8F

- [2088 Paparoa Valley Road - Submission to Proposed Kaipara District Plan.pdf](#)

- Do you have another further submission to make? \*  
8G

- Yes
- No

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- Enter the name of the person or organisation who made the original submission that you are further submitting on: \*  
9A

P Hames & L Jones

- Enter the exact submission point number that you are further submitting on 9B (incorrect numbers may cause your submission to be rejected):

201.3

FS28.7

- I support/oppose (tick applicable) the original submission of the submitter: \* 9C
  - I support this original submission point of the submitter named above
  - I oppose this original submission point of the submitter named above

- **Clearly explain below why you support or oppose the original submission point:**

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- The reasons for my support/opposition are: \* 9D

Oppose in Part - While the intent to recognise and provide for existing business and employment activities in these areas is understood, we consider that Light Industrial zoning is more appropriate than Commercial zoning for 2088, 2078 and 2074 Paparoa Valley Road, Kaipara. The nature, scale and operational characteristics of existing activities in these locations align more closely with a Light Industrial Zone and such zoning would better manage effects, provide operational certainty and avoid potential reverse sensitivity issues that may arise from a Commercial zoning framework.

- Do you have any attachments that relate directly to your Further Submission that 9E you would like to upload? \*

- Yes
- No

- Upload the file/s you wish to attach here: 9F

- [2088 Paparoa Valley Road - Submission to Proposed Kaipara District Plan.pdf](#)

- Do you have another further submission to make? \* 9G

Yes

No

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- Enter the name of the person or organisation who made the original submission **10A** that you are further submitting on: \*

Graham Taylor

- Enter the exact submission point number that you are further submitting on **10B** (incorrect numbers may cause your submission to be rejected):

127.1

FS28.8

- I support/oppose (tick applicable) the original submission of the submitter: \* **10C**
  - I support this original submission point of the submitter named above
  - I oppose this original submission point of the submitter named above

- **Clearly explain below why you support or oppose the original submission point:**

1. Keep your explanation **brief** and ensure you give clear reasons for why you are supporting or opposing the original submission.
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- The reasons for my support/opposition are: \*  
10D

Oppose in Part - while the intent to provide for existing business and employment activities within this area is acknowledged, we consider that Light Industrial zoning is more appropriate than Commercial zoning for the site at 2088 Paparoa Valley Road and the neighboring properties at 2074 and 2078 Paparoa Valley Road. The existing land uses and operational activities along this corridor align more closely with a Light Industrial Zone. Rezoning to Light Industrial would better reflect the established use pattern, manage effects appropriately and reduce the potential for reverse sensitivity issues associated with a Commercial zoning framework.

- Do you have any attachments that relate directly to your Further Submission that you would like to upload? \*  
10E

- Yes
- No

- Upload the file/s you wish to attach here:  
10F

- [2088 Paparoa Valley Road - Submission to Proposed Kaipara District Plan.pdf](#)

- Do you have another further submission to make? \*  
10G

- Yes
- No

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- Enter the name of the person or organisation who made the original submission  
**11A** that you are further submitting on: \*

New Zealand Transport Agency

- Enter the exact submission point number that you are further submitting on  
**11B** (incorrect numbers may cause your submission to be rejected):

330.113

FS28.9

- I support/oppose (tick applicable) the original submission of the submitter: \*  
**11C**
- I support this original submission point of the submitter named above  
 I oppose this original submission point of the submitter named above

• **Clearly explain below why you support or oppose the original submission point:**

1. Keep your explanation **brief** and ensure you give clear reasons for why you are supporting or opposing the original submission.
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- The reasons for my support/opposition are: \*  
**11D**

Oppose

While the intent of NZTA's submission to manage State Highway access and zoning extents is acknowledged, we oppose its application where it would affect 2088 Paparoa Valley Road and neighboring sites in Paparoa.

We request that any amendments to zoning extents or

application of Future Urban zoning expressly exclude 2088 Paparo Valley Road and do not constrain the site's existing or future Light Industrial use.

- Do you have any attachments that relate directly to your Further Submission that you would like to upload? \*  
11E

- Yes
- No

- Upload the file/s you wish to attach here:  
11F
  - [2088 Paparoa Valley Road - Submission to Proposed Kaipara District Plan.pdf](#)

- Do you have another further submission to make? \*  
11G

- Yes
- No

## • Thank You for Your Submission

This is confirmation that your further submission has been successfully received and it will be forwarded to the District Planning Team for analysis. If there are any queries on your further submission, we will contact you either via email or telephone.

## Next Steps (Legal Requirement)

- You must serve a copy of your further submission on the original submitter within 5 working days of submitting it to the Council.
- This is your responsibility.
- Download contact details of original submitters here: [Submitter Contact List](#)

## Additional Information:

- If you submitted electronically, **no signature is required**.
- A copy of your submission will be emailed to you shortly.
  - If you don't receive it within a few minutes, check your **spam/junk/updates folders**.
- If you nominated an agent for correspondence, they will also receive a copy.

• [PublicVoice](#)

25 June 2025

Submission to Proposed Kaipara District Plan  
Kaipara District Council  
District Plan Team,  
Private Bag 1001,  
Dargaville 0340.

Sent via email to: [districtplanreview@kaipara.govt.nz](mailto:districtplanreview@kaipara.govt.nz)

## **Submission on Proposed Kaipara District Plan 2025 in accordance with Clause 6 of Schedule 1, Resource Management Act 1991**

### **Introduction**

Thank you for the opportunity to make a submission on the Proposed Kaipara District Plan (PKDP).

This submission is lodged by Easdale Surveyors and Planners on behalf of Huband Contractors Limited (HCL), a long-standing and locally owned civil contracting business operating from 2088 Paparoa Valley Road, Paparoa.

HCL seeks a zoning change of its site and adjoining properties from Rural Lifestyle Zone to Light Industrial Zone to better reflect current and future land use needs.

This submission addresses:

- Rezoning of 2088 Paparoa Valley Road (and neighbouring sites at 2074 and 2078 Paparoa Valley Road);
- Opportunities to increase provision for commercial and light industrial activities in the district; and
- The need to support projected residential growth through complementary employment and service-based land uses.

### **About Huband Contractors Limited (HCL)**

HCL is a locally established business that has operated from Paparoa for over 40 years, providing essential contracting services including earthworks, drainage, roading, siteworks, yard supply and water delivery across the Kaipara, Whangārei, Rodney, and Far North districts.

The business plays a critical role in supporting both infrastructure and development needs within the district and forms an integral part of the Paparoa community and its economic base.

HCL has been actively engaged with Kaipara District Council through previous consultation processes, including the Draft Sub-Regional Spatial Plan and Exposure Draft of the District Plan.

### **Description of Site and Current Use**

The subject site at 2088 Paparoa Valley Road is currently utilised as a depot and operations yard for HCL. The site includes:

- Storage and maintenance facilities for contracting trucks and heavy machinery.
- Ancillary office space and associated operational buildings.
- Large areas of open yard for operations and materials.

Access to the site is provided from Paparoa Valley Road via a formed accessway along the southern boundary.

The eastern portion of the site contains the main buildings and infrastructure, while the western portion accommodates yard-based operations. Aerial imagery and zoning maps are attached to this submission (refer to Figure 1 and Figure 2).

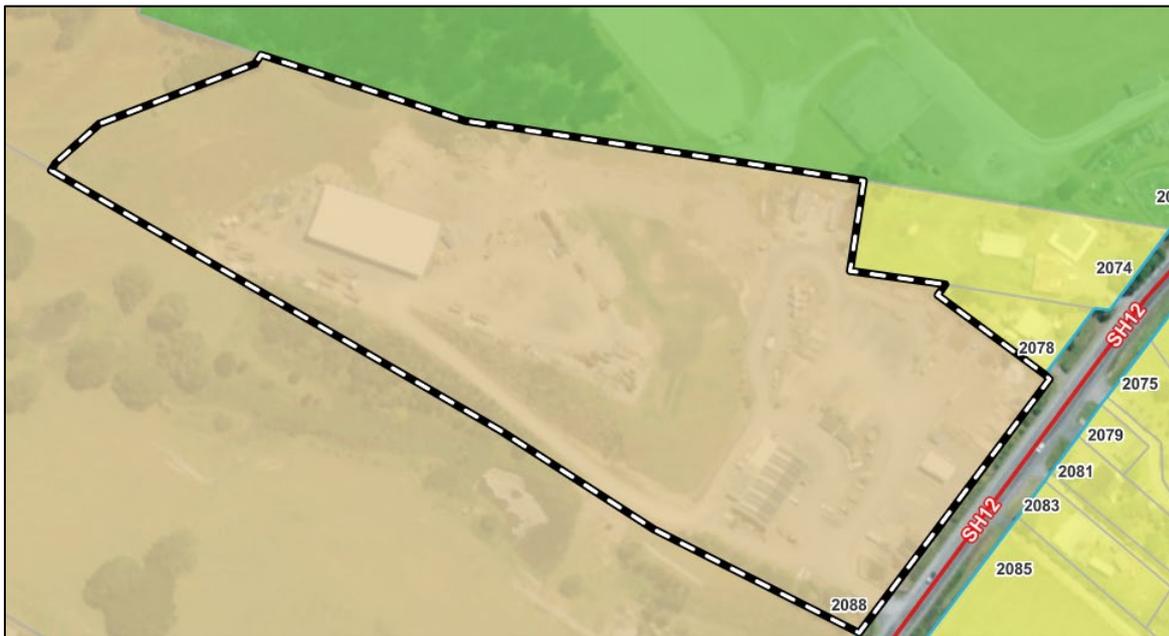


Figure 1: Zoning of the site under the Proposed Kaipara District Plan (source: KDC Proposed District Plan maps)



Figure 2: Aerial view of the site including adjoining neighbouring sites at 2074 and 2078 Paparoa Valley Road.

The existing use of the site aligns more closely with the definition of Light Industrial Activities under the PKDP, which states *activity that manufactures, fabricates, processes, packages, distributes, repairs, stores, or disposes of materials (including raw, processed, or partly processed materials) or goods*. It includes any ancillary activity to the industrial activity. Trade and yard-based retailing forming part of this intention.

The activities on site and does not reflect the typical expectations of the Rural Lifestyle Zone, which prioritises low-density rural living and lifestyle development.

## Relief Sought

This submission seeks to rezone the site at 2088 Paparoa Valley Road from Rural Lifestyle Zone to Light Industrial Zone. This request is also extended to include adjoining sites at 2074 and 2078 Paparoa Valley Road, as identified in Figure 2, where industrial and contracting operations will be further expanded.

The proposed zoning change will:

- Recognise and legitimise the long-standing industrial use of the site.
- Provide certainty for the ongoing operation and future growth of HCL.
- Enable better alignment between zoning provisions and on-the-ground activities.
- Avoid future consenting issues and potential non-compliances.
- Support the objectives of economic resilience and employment growth for the Kaipara District.

## Strategic Justification

This submission is consistent with the strategic intent of the PKDP and broader economic development goals of Kaipara District.

The current zoning:

- Does not provide an enabling framework for HCL's industrial operations.
- Limits the ability of an essential local business to grow and diversify.
- Does not reflect the real land use character of the site.

A zoning change would support more efficient land use patterns by formalising an existing industrial node, while also protecting the integrity of surrounding land uses through appropriate setbacks, landscaping, and operational controls.

In addition, with the PKDP's emphasis on enabling greater residential development, it is essential that sufficient land is provided for local jobs, services, and industrial support. A well-integrated supply of employment-zoned land is crucial for the long-term sustainability of the district's growing communities.

## Additional Comments

HCL supports Submission No. 52 to the PKDP, which recommends a zoning change at 2088 Paparoa Valley Road, but notes that the preferred zoning is Light Industrial, not an alternative zone.

A summary of other PKDP provisions supported or opposed by HCL is provided in Table 1 (attached), along with suggested wording amendments.

HCL is committed to working constructively with Council to refine the zoning and policy settings and ensure they reflect current land use realities and support Kaipara's long-term growth strategy.

### **Decision Sought**

HCL submits that the Proposed Kaipara District Plan, as currently drafted, does not adequately provide for established industrial operations at Papanoa Valley Road.

Accordingly, we request that Council:

- Amend the zoning of 2088, 2074, and 2078 Papanoa Valley Road from Rural Lifestyle Zone to Light Industrial Zone.
- Make any consequential amendments necessary to give effect to the rezoning.
- Consider the submission points and proposed amendments outlined in **Table 1**.

We welcome the opportunity to further engage with Council as part of the District Plan review process.

Kind regards,



**Rayya Ali**  
Business Lead and Principal Planner  
Easdale Surveyors and Planners

Table 1: Summary of PKDP submission with recommended amendments by HCL.

No.	Chapter / Appendix / Schedule / Maps	Objective / Policy / Rule / Standard / Overlay	Oppose / Support	Reasons	Decision Sought
1	Map	Zone	Amend	2088 Paparoa Valley Road is currently zoned Rural lifestyle. This site is an existing light industrial property owned and operated by Huband's Contractors, and the rural lifestyle zone is not appropriate. This zoning should be Light Industrial Zone.	Amend zoning of property 2088 Paparoa Valley from Rural lifestyle zone to Light Industrial Zone. Refer to Figure 1 above.
2	Light Industrial Zone	LIZ – O1	Support	We support the objective as it aligns with Huband Contracting operations and enables industrial growth in the region.	None
3	Light Industrial Zone	LIZ – P1	Support	The provision supports a wide range of activities suitable for our operations and is consistent with the zones purpose.	None
4	Light Industrial Zone	LIZ – R4	Support in Part	Support in Part – While the provisions allow for ancillary retail and office activity, we oppose the default activity status being Discretionary for ancillary retail and office activities that exceed the 250m <sup>2</sup> threshold. There may be instances where sites can comfortably accommodate larger floor areas without compromising the function or	Amend the non-compliance activity status to Controlled or Restricted Discretionary Activity to provide a more proportionate response that still enable appropriate assessment and control.

				character of the zone. A more enabling activity status (e.g., Restricted Discretionary) would be more appropriate in such cases, subject to relevant assessment criteria.	
5	Light Industrial Zone	LIZ – R6	Support in Part	The core intent of the Light Industrial Zone is to accommodate a broad range of industrial and supporting activities. While the provisions permit ancillary retail and office activities within buildings up to 250m <sup>2</sup> GFA, any exceedance defaults to a Discretionary Activity status. We oppose this restrictive activity status, as it places unnecessary constraints on sites that can comfortably accommodate larger buildings. We recommend that non-compliance with the GFA threshold instead be classified as a Restricted Discretionary Activity, enabling appropriate assessment without unduly limiting development potential aligned with the purpose of the zone.	Amend the non-compliance activity status to a Controlled or Restricted Discretionary Activity.
6	Light Industrial Zone	LIZ – S4	Support in Part	Landscaping requirements should be balanced to support industrial functionality and not reduce usable land area.	Reduce the minimum depth of the landscape strip from 2m to 1.5m, particularly along internal road

				<p>We support the intention of the landscaping provision to manage visual amenity and interface effects between Light Industrial activities and more sensitive zones. However, we request amendments to allow greater flexibility for industrial operators while still maintaining appropriate site screening and amenity outcomes.</p>	<p>boundaries or where site constraints limit available space.</p> <p>Allow for alternative screening measures, such as fencing, earth bunding, or other form of screening, to be considered in place of full vegetative screening where appropriate.</p> <p>Clarify that the landscaping requirement applies only where a Light Industrial zone directly adjoins a more sensitive zone (i.e., shared boundary), not where zones are separated by roads or other buffers.</p> <p>Provide discretion for Council to waive or modify the requirement based on site-specific context, existing vegetation, or functional layout of the site.</p>
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