

# Tiny Homes – Preliminary Issues and Options Report

## Introduction

Tiny Homes of any constructed scale or form are currently classed as “Dwellings” under the Whakatane District Plan. This leads to a resource consent process for any tiny home where there is an existing dwelling on site in the residential and rural zones.

Resource consents, while attainable, result in uncertainty, cost and time constraints that can have a disproportionately large impact on the provision of this low cost form of housing.

Tiny Homes are also subject to the Building Act and Building Consent is required. There are some exempt buildings but not where a building contains sanitary or cooking facilities.

There is an opportunity to better enable provision of “Tiny Homes” to meet part of the unmet demand for housing. Tiny homes and other types of small dwellings have the potential to be provided in a way that improves access to housing while having a low a level of effect on natural and physical resources, including on infrastructure.

## Issues

### Housing Need

The Whakatane District, as with many areas in New Zealand, has an insufficient supply of good affordable, healthy and sustainable housing. Access to good housing is critical to health and education outcomes.

An assessment of demand for housing and the extent to which the operative District Plan provides development opportunities that match this demand was undertaken in 2021 for the Council .

After several decades of no growth, Whakatāne district has transitioned into a high growth area. Strong growth in the population is expected to continue in the future and changes in demographics suggests that demand for dwellings is expected to remain high. Analysis of the Whakatāne District Plan suggests that there may not be enough capacity to meet the expected demands in the medium or long term.

The market has tended to supply larger dwelling types, both recently and historically. Increases in dwelling prices may result in changes to the types of dwelling that are viable within Whakatāne and Kawerau districts.

The capacity enabled within the Operative District Plan (ODP) and the household dwelling demand preferences indicates that there will be shortages of both traditional standalone house and attached dwellings in the future.

There is a strong strategic case to provide a larger and more diverse housing supply.

## District Plan Provisions for Dwellings

The operative District Plan enables dwellings in the main zones generally as follows:

- Residential Zone - One dwelling per lot permitted, two or more dwellings requires Controlled Activity or Restricted Discretionary Activity resource consent.
- Rural Plain or Foothills Zone - One dwelling per lot permitted, two or more dwellings requires Discretionary Activity resource consent.

The definition of “Dwelling” is:

*“...means a building or part of a building used or intended to be used for a residential activity on a permanent basis, being one month or more in duration, and may include an apartment, a semidetached or detached house, home unit, town house, papakāinga unit, kaumatua flat, rest home for the rehabilitation and care of any group and similar forms of permanent residential development. This includes the construction, alteration, demolition, relocation, removal and re-siting of a dwelling.”*

The definition of “Building” is:

*“... means any vehicle, caravan or construction, whether movable or immovable used as a place of residence or business or for assembly or storage purposes;”*

The usual development controls apply to Dwellings in each zone such as height , natural light, yards, separation, density, outdoor living space, outdoor service courts, visual privacy, and building coverage. There is no minimum floor area for a dwelling.

The District Plan also enables one “accessory building for habitation” per lot in addition to a permitted dwelling in residential and rural zones.

The definition of “Accessory building for habitation” is:

*“...means a habitable building such as a sleep out or granny flat which is incidental to the main dwelling.”*

The usual development controls apply to an accessory building for habitation, and:

- A maximum gross floor area<sup>1</sup> limit of 65m<sup>2</sup> applies in both rural and residential zones;
- In the rural zones, vehicle access must be shared with the main dwelling, and the building must be within 20m of the main dwelling.

The “Accessory building for habitation” provision was not intended to include an independent second dwelling<sup>2</sup>. This has been confirmed in legal advice to the council, which included specific consideration of Tiny Homes. If the Tiny Home is completely self-contained and is capable of being used independently of the main dwelling, it must be treated as a second dwelling, rather than as an accessory building.

## National Direction

The current Government Policy Statement on Housing and Urban Development (GPS-HUD 2021) set a direction for housing and urban development in Aotearoa New Zealand.

The GPS-HUD 2021 Outcomes are

- Thriving and resilient communities
- Wellbeing through housing
- Māori housing through partnership
- An adaptive and responsive system

Six focus areas are identified as essential to achieving these outcomes:

- Ensure more affordable homes are built – to enable urban development, deliver infrastructure and drive action to build enough homes to support everybody’s wellbeing and make homes more affordable.
- Ensure houses meet needs – to ensure that our houses are warm, dry, accessible and affordable to run, and meet the needs and changing life circumstances of families and households.
- Enable people into stable, affordable homes – to ensure every New Zealander can live in a stable, affordable home from which they can thrive. Ensure that homelessness is prevented where possible.
- Support whānau to have safe, healthy affordable homes with secure tenure – the right to self-determine better housing and urban development solutions for iwi and Māori should be realised.

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<sup>1</sup> Gross floor area (GFA) is the sum of the total areas of building or buildings (including any void area in those floors such as service shafts or lift or stairwells) measured from the exterior faces of exterior walls or from the centre lines of walls separating two buildings, but excludes the floor area allocated to car-parking or vehicular access to car-parking and vehicular unloading areas.

<sup>2</sup> District Plan Review Decision report on the Rural Chapter.

- Re-establish housing’s primary role as a home rather than a financial asset – to reduce speculative investment in existing housing stock, making home ownership more accessible for first-home buyers.
- Plan and invest in our places – to ensure our neighbourhoods and places meet the needs of our communities today and are well equipped to meet long- term climate, social, cultural, environmental and economic challenges and opportunities.

Another important national direction to consider is the National Policy Statement on Highly Productive Land (NPS HPL). The District Plan must meet the objective that highly productive land is protected for use in land-based primary production, both now and for future generations. NPS HPL policies include a requirement that rezoning and development of highly productive land as “rural lifestyle” is avoided. In rural zones, the nature and scale of secondary residential uses will therefore need to be carefully managed to avoid effects on land-based primary production on highly productive land.

### Coalition Government Policy Changes

The coalition government recently signalled its intention to directly address the issue of “granny flats” and other small homes (now referred to as “Secondary units”) and to significantly lower consenting hurdles as one part of its wider “Going for Housing Growth” agenda,

The Coalition Agreement between New Zealand National Party & New Zealand First has announced the following:

#### **Delivering Better Public Services - Seniors**

Amend the Building Act and the Resource Consent system to make it easier to build granny flats or other small structures up to 60sqm requiring only an engineer’s report.

Building and Construction Minister Chris Penk said this on 18 February 2024:

*“Another easy win can be found in National’s coalition agreement with New Zealand First. It mandates that very small dwellings, such as granny flats, will not need a building consent if they are of a certain size, and will only require an engineer’s report.”<sup>3</sup>*

This coalition action is understood to be part of the second Resource Management Amendment Bill to be introduced in July 2024, and an Act to be in place by March 2025.

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<sup>3</sup> <https://www.thepost.co.nz/business/350180511/govt-plans-attack-high-home-building-costs>

## Building Act

Under the Building Act, all buildings must comply with the NZ Building Code and most buildings require Building Consent.

New Zealand's building legislation recognises some building work does not require a building consent. The list of building work includes conditions to manage risk.

Residential buildings are generally not exempt if they include bathroom or kitchen facilities. Sleepouts up to 30m<sup>2</sup> are exempt from needing Building Consent, subject to conditions for durability, smoke alarms, stormwater and wastewater capacity being met.

## National Planning Standards

The purpose of national planning standards (NPStds) is to make council plans and policy statements easier to prepare, understand and comply with. They do this by improving the consistency of the format and content.

Under the NPStds the definition of **Minor residential unit** is

*"...means a self-contained residential unit that is ancillary to the principal residential unit, and is held in common ownership with the principal residential unit on the same site."*

The reference to a minor residential unit being "self-contained" clearly intends that bathroom, kitchen and laundry facilities will be included in a minor residential unit. The inclusion of being "ancillary" potentially conflicts with this. However, in context ancillary can be read as meaning the residential unit will be secondary to the principal (or primary) dwelling in terms of its scale, character and intensity, rather than its functional relationship to the principal.

If the pending Coalition Government policy changes described above come into effect, there may need to be consequential changes to the NPStds, at least to align language to refer to "secondary units" if this terminology is to be adopted in any new legislation. An NPStds change could also resolve the current conflict between "ancillary" and "self-contained" in the definition.

## Regional Direction

The Regional Policy Statement provides direction for integrated management of natural and physical resources, including managing rural development and protecting versatile land with an approach largely aligned with the NPS HPL objectives and policies.

The Regional Natural Resources Plan manages land and water effects of development including requirements for onsite effluent treatment in serviced or rural areas that must be met.

## Climate Change

Secondary dwellings are subject to same climate change consideration of wider Council housing policy and approaches such as natural hazard risk management. Secondary dwellings in residential zones have the potential to promote more compact urban form and to reduce overall travel demand and related GHG emissions. Conversely, secondary dwellings in rural areas or more remote settlement areas have the potential to spread development and to increase overall travel demand and emissions.

## Approaches Elsewhere

### *Western Bay of Plenty District*

In rural and residential and rural zones, “Minor Dwellings” up to 60m<sup>2</sup> gross floor area are a controlled activity with requirements to share a driveway with the main dwelling, and an 18m<sup>2</sup> limit on associated garaging. In the rural zones the minor dwelling must be located within 20m of the main dwelling.

WBOPDC are considering a plan change to allow Minor Dwellings as a permitted activity, but this workstream will follow central government policy direction once it is known.

### *Opotiki District*

There are no specific provisions for secondary dwellings, relying instead on relatively generous permitted activity provisions for multiple dwellings.

In the residential zone, up to three dwellings are permitted per lot where there is a minimum of 400m<sup>2</sup> per dwelling and a sewer connection. In unsewered locations, more than one dwelling per lot is a Discretionary Activity.

In the rural zone, dwelling numbers are based on site area

- 1ha: one dwelling per lot
- 1-4ha: two dwellings per lot
- 4ha: three dwellings per lot

Dwellings above this level are a Discretionary Activity.

### *New Plymouth District*

In rural and residential and rural zones, “Minor Residential Units” are a permitted activity. In the rural zone, Minor Residential Units must share a driveway with the main dwelling and must be located within 25m of the main dwelling. No GFA limits apply in either zone.

## Preliminary Evaluation of Alternatives

When the Council undertakes a change to the District Plan it is required to prepare an Evaluation Report under Section 32 of the Resource Management Act 1991 (RMA).

The Evaluation Report must examine whether the objectives of the proposal are the most appropriate way to achieve the purpose of the Act, and whether the provisions (the policies, rules and other methods) are the most appropriate way of achieving the objectives.

### Objectives and Policies

Changes to objectives and policies are unlikely to be needed as the existing residential and rural zone provisions appropriately address maintenance and enhancement of the character and amenity for dwellings and residential activities, balanced against the protection of natural and physical resources.

### Options

Practicable options are identified as:

- Option 1: Business as Usual
- Option 2: Plan Change - do minimum alignment with National Planning Standards
- Option 3: Plan Change – Alignment with National Planning Standards plus provision for minor residential units that do not meet permitted activity rules as a Restricted Discretionary Activity

#### Option 1: Business as Usual

- Continue with current District Plan policy settings and implementation.

Business as usual would also respond as needed to the signalled change in government policy to reduce consent requirements for “secondary units” once more information is provided.

#### Option 2: Plan Change - Do minimum Alignment with National Planning Standards

- Delete the definition of “accessory building for habitation” and replace with “minor residential unit” as provided in the NPStds.

This option would provide certainty that tiny homes, granny flats and other small dwellings could be constructed as self-contained units, while ensuring that they remained secondary to the primary dwelling in terms of their scale, character, and intensity.

All other development standards and consent requirements would remain unchanged.

The existing activity status cascade for non-compliances would also continue to apply:

- Restricted Discretionary Activity status would apply to non-compliance with height , natural light, yards, separation, density, outdoor living space, outdoor service courts, visual privacy, and building coverage.
- Discretionary Activity status would apply to:
  - additional GFA above 65m<sup>2</sup>,
  - more than one minor residential unit per lot;
  - minor residential unit located more than 20m from the main dwelling in the rural zones.

See Appendix 1 - Proposed Plan Change Provisions.

### Option 3: Plan Change – Alignment with National Planning Standards plus provision for minor residential units that do not meet permitted activity rules as a Restricted Discretionary Activity

- Delete the definition of “accessory building for habitation” and replace with “minor residential unit” as provided in the NPStds, and;
- Include specific provisions that allow for minor residential units that do not meet permitted activity rules to be assessed as a Restricted Discretionary Activity

Option 3 would achieve the same outcomes as Option 2 but would also allow minor residential units that did not comply with activity rules for maximum GFA, number of units and location relative to the primary dwelling to be considered through a resource consent application, assessed against specified matters of discretion and conditions.

A consistent Restricted Discretionary Activity status would be applied to all minor residential unit non-compliances, enabling flexibility to address site specific circumstances and the scale of effects of non-compliance, while ensuring the activity remained secondary to the primary dwelling in terms of their scale, character, and intensity.

Controlled Activity status is not considered to be a practicable option to address non-compliances given uncertainty over the potential range and scale of effects of non-compliance, and conditions. This option would also be inconsistent with the District Plan structure.

See Appendix 2 - Proposed Plan Change Provisions

### Preliminary Option Evaluation

Option	Advantages	Disadvantages
Option 1: Business as Usual	No costs of Plan Change. Central government policy setting changes will apply	No improvement in access to housing.



Option	Advantages	Disadvantages
	as and when they are finalised. The current time frames for legislation may also be quicker than those of a plan change, if any opposing submissions are received.	Higher compliance costs for prospective homeowners if government policy setting changes do not proceed. Uncertainty over Central Government policy changes scope and timing.
Option 2: Do Minimum Plan Change - Alignment with National Planning Standards	Support policy direction to improve access to housing. Provides certainty on secondary dwelling provision.	Costs of Plan Change process and hearings. May require rework if initiated ahead of pending government policy changes. Potential conflict with NPS HPL if not controlled as to form and scale.
Option 3 Plan Change – Alignment with National Planning Standards plus provision for minor residential units that do not meet permitted activity rules as a Restricted Discretionary Activity	Support policy direction to improve access to housing. Provides certainty on secondary dwelling provision. Flexibility to address site specific circumstances and the scale of effects of non-compliance.	Costs of Plan Change process and hearings. May require rework if initiated ahead of pending government policy changes.

## Conclusion

A Plan Change to enable secondary housing could support the policy direction to improve access to housing.

A signalled coalition government policy change is closely aligned with this local opportunity, but potentially goes much further with the proposed streamlining of processes under the BA. Moves to initiate a plan change should therefore await clarity on the outcomes of the current work on policy and legislation changes. This is likely to be known in July 2024.

If a Plan Change is ultimately required, alignment of the District Plan provisions with the National Planning Standards for “minor residential units” is the recommended “do-minimum” approach, with the further option of a Restricted Discretionary Activity for non-compliance as a way to improve effectiveness and efficiency of the provisions.

It would be appropriate to broaden the scope of the possible Plan Change from the current “tiny homes” to refer to “minor residential units” or “secondary units”.

# Appendix 1 – Option 2 Proposed Plan Change Provisions

## Definitions

Delete the definition of “*Accessory building for habitation*”

Include the following definition:

**“Minor residential unit** means a self-contained residential unit that is ancillary to the principal residential unit and is held in common ownership with the principal residential unit on the same site.”

## General Residential Zone

In the General Residential Zone replace the reference to “*Accessory building for habitation*” with “*Minor residential unit*” in the following rules:

- GRZ-R3 (Heading, Number and size of buildings per lot)
- GRZ-R44 b, d, and e (Distance to boundaries)
- GRZ-R45 b, Fig 69 & legend (Distance between residential activities)
- GRZ-R49 1 (Visual privacy)
- GRZ-AC12 (Visual privacy assessment criteria)

In the General Residential Zone add a reference to “*Minor residential unit*” in the following rules:

- GRZ-R50 1a (Building coverage)

## Medium Density Residential Zone

In the Medium Density Residential Zone replace the reference to “*Accessory building for habitation*” with “*Minor residential unit*” in the following rules:

- MDRZ-R3 (Heading, Number and size of buildings per lot)
- MDRZ-R44 b, d, and e (Distance to boundaries)
- MDRZ-R45 b, Fig 76 & legend (Distance between residential activities)
- MDRZ-R49 1 (Visual privacy)
- MDRZ-AC13 (Visual privacy assessment criteria)

In the Medium Density Residential Zone add a reference to “*Minor residential unit*” in the following rules:

- MDRZ-R50 1a (Building coverage)

## General Rural Zone

In the General Rural Zone replace the reference to “*Accessory building for habitation*” with “*Minor residential unit*” in the following rules:

- GRUZ-R4 (Heading, Number, access, bulk and location per lot)
- GRUZ-R6 b, Fig 80 & legend (Distance between residential activities)

In the General Rural Zone add a reference to “*Minor residential unit*” in the following rules:

- GRUZ-R48 c (Distance to boundaries)

### Rural Production Zone

In the Rural Production Zone replace the reference to “*Accessory building for habitation*” with “*Minor residential unit*” in the following rules:

- RPROZ-R3 (Heading, Number, access, bulk and location per lot)
- RPROZ-R6 b, Fig 88 & legend (Distance between residential activities)

In the Rural Production Zone add a reference to “*Minor residential unit*” in the following rules:

- RPROZ-R48 c (Distance to boundaries)

### Rural Coastal Zone

In the Rural Coastal Zone replace the reference to “*Accessory building for habitation*” with “*Minor residential unit*” in the following rules:

- RCZ-R6 (Heading, Number, access, bulk and location per lot)
- RCZ-R8 b, Fig 163 & legend (Distance between residential activities)
- RCZ-AC3 (Assessment criteria for accessory buildings for habitation)

In the Rural Coastal Zone add a reference to “*Minor residential unit*” in the following rules:

- RCZ-R48 c (Distance to boundaries)

### Rural Ohiwa Zone

In the Rural Ohiwa Zone replace the reference to “*Accessory building for habitation*” with “*Minor residential unit*” in the following rules:

- ROZ-R9 (Heading, Number, access, bulk and location per lot)
- ROZ-R12 b, Fig 170 & legend (Distance between residential activities)

In the Rural Ohiwa Zone add a reference to “*Minor residential unit*” in the following rules:

- ROZ-R2 1, 2, 3 (Location of buildings)
- ROZ-R51 1c (Distance to boundaries)

## Coastal Protection Zone

In the Coastal Protection Zone replace the reference to “*Accessory building for habitation*” with “*Minor residential unit*” in the following rule:

- CPZ-R3 (Heading, Number, access, bulk and location per lot)

# Appendix 2 – Option 4 Proposed Plan Change Provisions

## Definitions

Delete the definition of “*Accessory building for habitation*”

Include the following new definition:

**“Minor residential unit** means a self-contained residential unit that is ancillary to the principal residential unit and is held in common ownership with the principal residential unit on the same site.”

## General Residential Zone

In the General Residential Zone replace the reference to “*Accessory building for habitation*” with “*Minor residential unit*” in the following rules:

- GRZ-R3 (Heading, Number and size of buildings per lot)
- GRZ-R44 b, d, and e (Distance to boundaries)
- GRZ-R45 b, Fig 69 & legend (Distance between residential activities)
- GRZ-R49 1 (Visual privacy)
- GRZ-AC12 (Visual privacy assessment criteria)

In the General Residential Zone add a reference to “*Minor residential unit*” in the following rules:

- GRZ-R50 1a (Building coverage)

In the General Residential Zone add the following additional **Assessment Criteria for Restricted Discretionary Activities**

### ***Minor Residential Unit***

Council shall restrict its discretion to

- a. The extent to which the activity will remain ancillary to the principal residential unit;*
- b. The extent to which site characteristics restrict the ability to comply with the permitted activity standards;*
- c. Effects on local infrastructure*
- d. Effects on the amenity of the site and adjacent public areas.*

## Medium Density Residential Zone

In the Medium Density Residential Zone replace the reference to “*Accessory building for habitation*” with “*Minor residential unit*” in the following rules:

- MDRZ-R3 (Heading, Number and size of buildings per lot)

- MDRZ-R44 b, d, and e (Distance to boundaries)
- MDRZ-R45 b, Fig 76 & legend (Distance between residential activities)
- MDRZ-R49 1 (Visual privacy)
- MDRZ-AC13 (Visual privacy assessment criteria)

In the Medium Density Residential Zone add a reference to “Minor residential unit” in the following rules:

- MDRZ-R50 1a (Building coverage)

In the Medium Density Residential Zone add the following additional **Assessment Criteria for Restricted Discretionary Activities**

***Minor Residential Unit***

*Council shall restrict its discretion to*

- e. *The extent to which the activity will remain ancillary to the principal residential unit;*
- f. *The extent to which site characteristics restrict the ability to comply with the permitted activity standards;*
- g. *Effects on local infrastructure*
- h. *Effects on the amenity of the site and adjacent public areas.*

**General Rural Zone**

In the General Rural Zone replace the reference to “Accessory building for habitation” with “Minor residential unit” in the following rules:

- GRUZ-R4 (Heading, Number, access, bulk and location per lot)
- GRUZ-R6 b, Fig 80 & legend (Distance between residential activities)

In the General Rural Zone add a reference to “Minor residential unit” in the following rules:

- GRUZ-R48 c (Distance to boundaries)

Add the following additional **Assessment Criteria for Restricted Discretionary Activities**

***Minor Residential Unit***

*Council shall restrict its discretion to*

- a. *The extent to which the activity will remain ancillary to the principal residential unit;*
- b. *The extent to which site characteristics restrict the ability to comply with the permitted activity standards;*

- c. Effects on rural amenity values, and the amenity of the site and adjacent public areas;
- d. The potential loss or restriction on the use of versatile land for primary productive use.

## Rural Production Zone

In the Rural Production Zone replace the reference to “*Accessory building for habitation*” with “*Minor residential unit*” in the following rules:

- RPROZ-R3 (Heading, Number, access, bulk and location per lot)
- RPROZ-R6 b, Fig 88 & legend (Distance between residential activities)

In the Rural Production Zone add a reference to “*Minor residential unit*” in the following rules:

- RPROZ-R48 c (Distance to boundaries)

Add the following additional **Assessment Criteria for Restricted Discretionary Activities**

### **Minor Residential Unit**

Council shall restrict its discretion to

- e. The extent to which the activity will remain ancillary to the principal residential unit;
- f. The extent to which site characteristics restrict the ability to comply with the permitted activity standards;
- g. Effects on rural amenity values, and the amenity of the site and adjacent public areas;
- h. The potential loss or restriction on the use of versatile land for primary productive use.

## Rural Coastal Zone

In the Rural Coastal Zone replace the reference to “*Accessory building for habitation*” with “*Minor residential unit*” in the following rules:

- RCZ-R6 (Heading, Number, access, bulk and location per lot)
- RCZ-R8 b, Fig 163 & legend (Distance between residential activities)

In the Rural Coastal Zone add a reference to “*Minor residential unit*” in the following rules:

- RCZ-R48 c (Distance to boundaries)

Add the following additional **Assessment Criteria for Restricted Discretionary Activities**



### **Minor Residential Unit**

Council shall restrict its discretion to

- i. The extent to which the activity will remain ancillary to the principal residential unit;
- j. The extent to which site characteristics restrict the ability to comply with the permitted activity standards;
- k. Effects on rural amenity values, and the amenity of the site and adjacent public areas;
- l. The potential loss or restriction on the use of versatile land for primary productive use.

### **Rural Ohiwa Zone**

In the Rural Ohiwa Zone replace the reference to “Accessory building for habitation” with “Minor residential unit” in the following rules:

- ROZ-R9 (Heading, Number, access, bulk and location per lot)
- ROZ-R12 b, Fig 170 & legend (Distance between residential activities)

In the Rural Ohiwa Zone add a reference to “Minor residential unit” in the following rules:

- ROZ-R2 1, 2, 3 (Location of buildings)
- ROZ-R51 1c (Distance to boundaries)

Add the following additional **Assessment Criteria for Restricted Discretionary Activities**

### **Minor Residential Unit**

Council shall restrict its discretion to

- m. The extent to which the activity will remain ancillary to the principal residential unit;
- n. The extent to which site characteristics restrict the ability to comply with the permitted activity standards;
- o. Effects on rural amenity values, and the amenity of the site and adjacent public areas;
- p. The potential loss or restriction on the use of versatile land for primary productive use.

### **Coastal Protection Zone**

In the Coastal Protection Zone replace the reference to “Accessory building for habitation” with “Minor residential unit” in the following rule:

- CPZ-R3 (Heading, Number, access, bulk and location per lot)

Add the following additional **Assessment Criteria for Restricted Discretionary Activities**

***Minor Residential Unit***

*Council shall restrict its discretion to*

- q. *The extent to which the activity will remain ancillary to the principal residential unit;*
- r. *The extent to which site characteristics restrict the ability to comply with the permitted activity standards;*
- s. *Effects on rural amenity values, and the amenity of the site and adjacent public areas;*
- t. *The potential loss or restriction on the use of versatile land for primary productive use.*