



Form 6

FURTHER SUBMISSION IN SUPPORT, OR PARTIAL SUPPORT OF, SUBMISSIONS ON A PUBLICLY NOTIFIED PROPOSED PLAN CHANGE

Under Clause 8 of Schedule 1, Resource Management Act 1991

TO:

PLANNING AND POLICY

FAR NORTH DISTRICT COUNCIL (FNDC)

PRIVATE BAG 752

KAIKOHE 0400

| FOR FNDC OFFICE USE ONLY | |
|--------------------------|--|
| Further Submission No: | |
| Receipt Date: | |

TO: PLANNING AND POLICY, FNDC

NAME: TOKERAU BEACH TRUST (THE FURTHER SUBMITTER)

1. This is a further submission in support, or in partial support, of submissions made on the Proposed Far North District Plan (**PFNDP**).
2. The further submitter:

Has an interest in the proposal that is greater than the interest the general public has due to their significant landholdings legally described as Lot 3 DP206044 located at Tokerau Beach.
3. The further submission is contained in **Table 1** on the attached sheet(s).
4. In regard to the various submissions that the further submitter supports, or partially supports, we comment as follows:

Plan Section – Rural Production

- The further submitter supports, or partially supports, those submissions that seek renaming of the Rural Production zone to 'General Rural zone' (or similar).
- The further submitter supports, or partially supports, those submissions that seek greater acknowledgement of the multi-faceted role of the rural areas of the district, which includes rural production but also providing opportunities for the housing of rural workers and for meeting the high demand for rural residential housing.
- The further submitter supports, or partially supports, those submissions that seek additional subdivision and development potential (greater flexibility) within the Rural Production zone, especially on land that has poor soils and that cannot support rural production activities. PFNDP provisions should be based on the ability of land to be utilised for rural production activities rather than applying blanket restrictions.
- The further submitter supports, or partially supports, those submissions that seek to maintain the number of dwellings that can be constructed on a lot, and the ratio of dwellings per square metre lot size, as per the relevant provisions of the Operative Far North District Plan (OFNDP).

Plan Section - Subdivision

- The further submitter supports, or partially supports, those submissions that seek to enable environmental benefit and Management Plan subdivision within the Rural Production zone, especially on land that has poor soils that cannot support rural production activities.
- The further submitter supports, or partially supports, those submissions that seek to enable environmental benefit and Management Plan subdivision on smaller lots across the district to promote the wider protection and enhancement of indigenous vegetation and freshwater assets, as well as the planting of new indigenous vegetation and the creation of new wetlands.
- The further submitter supports, or partially supports, those submissions that seek better acknowledgement of the important role that rural lifestyle subdivision has in the rural area, and that rural residential activities can be a sustainable (and, in many cases, the only viable) use of rural land resource.
- The further submitter supports, or partially supports, those submissions that seek to reduce the minimum lot size requirements for subdivision within the Rural Production zone, especially on land that falls outside of the Outstanding Natural Landscape and High Natural Character overlays.
- The further submitter supports, or partially supports, those submissions that seek amendment of the subdivision rules so that they acknowledge, and deal with differently, subdivision of land that falls within and outside Outstanding Natural Landscape and High Natural Character overlays where these overlays affect a single legal land parcel.

Plan Section – Coastal Environment

- The further submitter supports, or partially supports, those submissions that query the purpose of the Coastal Environment overlay and how it relates to the Outstanding Natural Landscape and High Natural Character overlays.
- The further submitter supports, or partially supports, those submissions that promote the assessment of proposals in the Coastal Environment zone, and the Outstanding Natural Landscape and High Natural Character overlays, on merit, rather than by applying a blanket approach that establishes ‘avoid’ as the default position.
- The further submitter supports, or partially supports, those submissions that seek that the rules and provisions for land use and subdivision within the underlying zone should apply within the Coastal Environment overlay, unless land falls within the Outstanding Natural Landscape and High Natural Character overlays.
- The further submitter supports, or partially supports, those submissions that seek greater flexibility in relation to the establishment of new buildings or structures in the Coastal Environment overlay.

5. The reasons for the further submitter’s support, and/or partial support, for the submissions identified in **Table 1** are as follows:

- The relief sought by the submissions supported, or partially supported, by the further submitter will:
 - o Enable those people with rural landholdings located within the Rural Production zone, and within the Outstanding Natural Landscape and High Natural Character overlays, that cannot be used for rural production to better provide for their ongoing social, economic and cultural well-being.
 - o Enable the sustainable use of land resource for rural residential activities where the effects of such activities can be appropriately and effectively avoided, mitigated and/or remedied.
 - o Maximise opportunities for the protection and enhancement of indigenous vegetation and freshwater assets in the rural areas, regardless of lot size.
 - o Ensure that the PFNDP achieves the purpose, and that it is consistent with the principles, of the RMA.

- 6. The submitter seeks the following decision from the local authority:
*That the relief sought by the primary submitter, which is supported of partially supported by this further submission, be duly noted and considered by FNDC and that consequential changes are made to the PFNDP to give effect to the relief sought (as specified in **Table 1**).*
- 7. The further submitter wishes to be heard in support of its further submission.
- 8. If others make a similar further submission, the further submitter will consider presenting a joint case with them at the hearing.

SUBMITTER DETAILS

Date: 4 September 2023

Signed: 

Address for Service: Tokerau Beach Trust
c/- Harrison Grierson Consultants Limited
P O Box 5760, Victoria Street West
AUCKLAND 1142
Attention: Philip Comer

Email: p.comer@harrisingrierson.com

Telephone: (09) 966 3382

NOTE TO PERSON MAKING FURTHER SUBMISSION:

A copy of your further submission must be served on the original submitter within 5 working days after making the further submission to the local authority.

If you are making a submission to the Environmental Protection Authority, you should use form 16B. If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

TABLE 1: FURTHER SUBMISSIONS MADE BY TOKERAU BEACH TRUST

Plan Section – Rural Production

1/2

3

4

6 allow

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
|----------------|----------------------|-----------------|---|--|
| Sean Frieling | S357.026 | Support | The PDP needs to redefine the RPROZ so that productive land is defined based on its ability to produce food but can accommodate things other than rural production. ie. Rural production zoning on poor soils is wrong. That is the right place to put smaller areas for housing ie.2000sq mtrs. This should be corrected by amending RPROZ objectives, policies and rules zones to accommodate things other than rural production. Support the development bonus provisions for allow for smaller lot sizes in the rural | Amend Rural Production Zone objectives, policies and rules as separately submitted and allow smaller blocks of land ie.2000 sq mtrs Amend the Rural Production Zone objectives, policies and rules zones so that productive land is defined based on its ability to produce food but can accommodate things other than rural production. FS368.001 |
| Leah Frieling | S358.031 S358.030 | Support in Part | The Plan redefines the Rural Production zone so that it is based on its ability to produce food but can accommodate things other than rural production i.e. Rural Production zoning on poor soils is wrong. That is the right place to put smaller areas for housing i.e. 2,000 m². | Amend the Rural Production zone rules so that productive land is defined based on its ability to produce food but can accommodate things other than rural production. FS368.002 amend FS368.003 6 allow in part |

| Submitter Name | Submission Number | Oppose/ Support | Submission | Reason |
|--|---|-----------------|--|--|
| Northland Federated Farmers of New Zealand | S421.207 S421.204 S421.205 S421.206 each point lodge a new FS point | Support in Part | <p>...</p> <p>The concern Federated Farmers has is that the overview is focused on the absolute protection of highly productive from any activities other than primary production. The approach taken by the Council to prevent the fragmentation of rural production land is support but acknowledgement is also needed that all highly productive may not be profitable for the landowner. It would be unequitable for the Council to prohibit a rural landowner who has cared for the land for many years from achieving the real potential value of that land. The proposed district plan has strayed into private property rights through dictating what can and cannot be done on rural production land...</p> | <p>Amend the Rules to recognise and provide for private property rights and allow landowners to subdivide land in the rural production zone for specific purposes such as creating lifestyle lots and lots for family members (amongst other matters).</p> <p>5 amend</p> <p>6 allow in part</p> <p>FS368.004 FS368.005 FS368.006 FS368.007</p> |

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
|---|---|---|---|--|
| <p>Martin John Yuretich</p> <p>Joel Vieviorka</p> | <p>S40.015</p> <p>S41.015</p> | <p>Support</p> <p>Support</p> | <p>The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone. The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision.</p> <p>...</p> <p>It is correct to protect rural productive potential, but this can be achieved without imposing a total restriction on rural lifestyle properties.</p> | <p>RPROZ-R3 - Amend allotment sizes, perhaps with a limited number of allotments of a minimum of 8000m² or 1ha, then 4ha generally after that. Smaller lot sizes should apply for properties (or parts thereof) that do not consist of highly productive land.</p> <p>...</p> <p>Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision.</p> <p>FS368.008 FS368.009</p> |

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
|-----------------------------------|------------------------------------|----------------|---|---|
| Sapphire Surveyors Limited | S348.002 S348.003 | Support | The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the Rural Production zone. The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision | Amend Rule RPROZ-R3 to align with changes sought by submitter to Standard SUB-S1 as it relates to subdivision in the Rural Production zone. FS368.010 FS368.011 5 amend 6 allow |
| Lynley Newport | S104.001 | Support | The discretionary activity minimum lot size should remain at four hectares and, as such, the discretionary residential intensity ratio in Rule RPROZ-R3 DIS-1 should similarly be four hectares. | Amend Rule RPROZ-R3 DIS-1 as follows - The site area per residential unit is at least 8ha 4ha. FS368.012 |

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
|---|--|-----------------------|--|--|
| <p>Sean Frieling</p> <p>Leah Frieling</p> <p>LJ King Ltd</p> | <p>S357.041</p> <p>S358.044</p> <p>S464.041</p> | <p>Support</p> | <p>We do not support the new permitted residential intensity rule density (multiple dwellings per title) and submit that it be retained at the 1 dwelling per 12ha intensity, as per the existing operative district plan. This is requested as still allows for a relatively low density of housing relative to land area, but still allows for the provision of housing in a rural setting. It is submitted that that the rule is currently effective, and should remain the same, to ensure that housing can still be provided in the general rural zone as a permitted activity as long as the subject site has a minimum of 12 hectares of land, and the minimum area of 3000m² of exclusive use surrounding the dwelling.</p> | <p>Amend to retain the operative district plan rule to ensure that housing can still be provided in the general rural zone as a permitted activity as long as the subject site has a minimum of 12 hectares of land, and the minimum area of 3000m² of exclusive use surrounding the dwelling.</p> <p>...</p> <p>Amend Rule RPROZ-R3 to reflect the requirements in the Operative District Plan, i.e. 1 dwelling per 12ha</p> <p>FS368.013</p> <p>FS368.014</p> <p>FS368.015</p> |

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
|--|---|----------------|--|---|
| Amber Hookway Wilson Hookway | S261.002 S264.002 | Support | <p>Submitter opposes change from "Residential development shall be limited to one unit per 12ha of land" to "The site area per residential unit is at least 40ha". There is a housing crisis and whanau are coming home to live on the land. 12ha is a huge area to be able to have one dwelling and all that will happen will be the Far North becomes full of unpermitted unsafe dwellings as this rule change will not stop family living on their land. There should be no limit to the number. This should be based on land size so owners of larger blocks are not disadvantaged by only being allowed a maximum of 6 regardless of their land size.</p> | <p>Amend to reinstate the equivalent operative District Plan rule (one residential unit per 12ha of land, with no maximum number per site)</p> <p>FS368.016 FS368.017</p> |
| Danielle Hookway Lianne Kennedy Allen Hookway | S309.002 S310.002 S311.002 | Support | <p>There is a housing crisis and whanau are coming home to live on the land. 12ha is a huge area to have one dwelling and all that will happen will be the Far North becomes full of unpermitted and unsafe dwellings as this rule change will not stop family living on their land. There should be no limit to the number. This should be based on land size so owners on larger blocks are not disadvantaged but only being allowed a maximum of 6 regardless of their land size.</p> | <p>Amend rule RPROZ-R3 to retain the current rule allowing residential development of one unit per 12 ha of land with no maximum number per site.</p> <p>FS368.018 FS368.019 FS368.020</p> |

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
|------------------------|-------------------|----------------|---|---|
| FNR Properties Limited | S319.002 | Support | The submitter considers that as RPROZ-R3 will be reducing the permitted threshold from one residential unit per 12ha to one residential unit per 40ha and limiting the total number of residential units on one site in the Rural Production Zone to six is overall a substantial reduction in the permitted residential intensity threshold in the zone and is heavy handed. | Amend RPZ-R3 to allow for a higher residential intensity and/or provide for more options for residential intensity as a controlled, restricted discretionary and discretionary activity. FS368.021 |
| FNR Properties Limited | S334.001 | Support | The PDP does not provide for any subdivision in the RPZ as a Restricted Discretionary Activity, and that the Discretionary Activity thresholds have been significantly reduced. The substantial reduction in the permitted residential intensity threshold in the RPZ is extremely heavy-handed and will result in significant adverse effects on the socioeconomic wellbeing of the Far North District. Imposing such restrictions on residential intensity will only contribute further to the current housing crisis that is being observed both locally and nationwide. Further, the RPZ objectives and policies as notified primarily provide for primary production activities in the RPZ and do not recognise that some properties are no longer suitable for production, or never have been suitable or used for production. Providing more | Amend the RPZ provisions to allow for a higher residential intensity in the RPZ and/or to provide for more options for residential intensity as a Controlled, Restricted Discretionary, and Discretionary Activity. FS368.022 |

| Submitter Name | Submission Number | Oppose/ Support | Submission | Reason |
|-----------------|-------------------|-----------------|---|--|
| | | | options for residential intensity as a Controlled, Restricted Discretionary, and Discretionary Activity would be more appropriate as this will enable such development to occur in the RPZ while providing for case by case consideration of any proposed residential activity within the context of the subject site and immediate surrounding environment (as opposed to a 'one size fits all' approach). | |
| Elbury Holdings | S485.041 | Support | We do not support the new permitted residential intensity rule density (multiple dwellings per title), and submit that it be retained at the 1 dwelling per 12ha intensity, as per the existing operative district plan. This is requested as still allows for a relatively low density of housing relative to land area, but still allows for the provision of housing in a rural setting. It is submitted that that the rule is currently effective, and should remain the same, to ensure that housing can still be provided in the general rural zone as a permitted activity as long as the subject site has a minimum of 12 hectares of land, and the minimum area of 3000m ² of exclusive use surrounding the dwelling. | Amend to ensure that housing can still be provided in the general rural zone as a permitted activity as long as the subject site has a minimum of 12 hectares of land, and the minimum area of 3000m ² of exclusive use surrounding the dwelling. FS368.023 |

| Submitter Name | Submission Number | Oppose/ Support | Submission | Reason |
|----------------------|-------------------|--------------------|---|---|
| Elbury Holdings | S519.040 | Support | We do not support the new permitted residential intensity rule density (multiple dwellings per title), and submit that it be retained at the 1 dwelling per 12ha intensity, as per the existing operative district plan. This is requested as still allows for a relatively low density of housing relative to land area, but still allows for the provision of housing in a rural setting. | Retain Rule 8.6.5.1.1 'Residential Intensity' under the operative district plan. FS368.024 |
| Thomson Survey Ltd | S222.091 | Support | The discretionary activity residential activity site area per residential unit should be reduced from at least 8ha to at least 4ha. | Amend RPROZ-3 DIS-1 to read as follows: DIS-1 The site area per residential unit is at least 4ha. FS368.025 |
| Bentzen Farm Limited | S167.090 | Support | The zoned is inappropriately named "Rural Production". Large parts of the district that is zoned this is not suitable for rural production and certainly is not retained for rural production purposes. The zone should be renamed to "General Rural" which more accurately reflects the wider range of activities that occur in the rural environments of the Far North. | Insert the following to the Overview: "The purpose of the zone is also to contribute to the social, economic and cultural well-being of the district by providing for a range of other land use activities" FS368.026 |

| Submitter Name | Submission Number | Oppose/ Support | Submission | Reason |
|--|---|-------------------------------|---|--|
| <p>The Shooting Box Limited</p> <p>Wendover Two Limited</p> <p>Matauri Trustee Limited</p> <p>P S Yates Family Trust</p> | <p>S187.079</p> <p>S222.083</p> <p>S243.108</p> <p>S333.080</p> | <p>Support</p> | <p>...large parts of the district that is zoned Rural Production is not suitable for rural production and certainly is not retained for rural production purposes; these activities are provided for in the zone as drafted (at least by the rules, but not recognised in the zone name; the zone name should recognise the broader range of land uses which occur in rural parts of the district; sustain the productive capacity of the soil and the rural character and amenity values that are key elements; the National Planning Standards "Zone Framework Standard" refers to the "General Rural Zone" which is a better fit; and discussion concerning the primary objective of the zone.</p> | <p>Insert the following to the Overview: "The purpose of the zone is also to contribute to the social, economic and cultural well-being of the district by providing for a range of other land use activities".</p> <p>FS368.027 FS368.028 FS368.029 FS368.030</p> |
| <p>Leah Frieling</p> | <p>S358.029</p> | <p>Support in Part</p> | <p>The Plan redefines the Rural Production zone so that it is based on its ability to produce food but can accommodate things other than rural production i.e. Rural Production zoning on poor soils is wrong. That is the right place to put smaller areas for housing i.e. 2,000 m².</p> | <p>Amend the Rural Production zone objectives so that productive land is defined based on its ability to produce food but can accommodate things other than rural production.</p> <p>FS368.031</p> |

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
|----------------|----------------------|-----------------|--|--|
| Michael Foy | S472.030 S472.031 | Support in Part | A separate alternative submission is to ask that the Plan redefines the RPROZ so that productive land is defined based on its ability to produce food but can accommodate things other than rural production. ie. Rural production zoning on poor soils is wrong. That is the right place to put smaller areas for housing ie.2000sq mtrs. | Amend the Rural Production Zone objectives so that productive land is defined based on its ability to produce food but can accommodate things other than rural production. FS368.032 FS368.033 |

Plan Section – Subdivision

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
|----------------|-------------------|----------------|---|--|
| Lynley Newport | S116.001 | Support | Support initiative for environmental benefit subdivision and the starting category of activity (restricted discretionary). There should not be any discouragement to landowners wanting to utilise this rule, and yet making non achievement of with RDIS-6, RDIS-7 and RDIS-8 defaulting to non-complying activity status does just that. Believe non achievement of the RDIS requirements should only default to discretionary activity status. | Retain Rule SUB-R6, subject to the following amendments to activity status: Activity status where compliance not achieved with RDIS - 1, RDIS-2,RDIS-3, RDIS-4, and RDIS-5, RDIS-6, RDIS-7 and RDIS-8 is not achieved: Discretionary Activity status where compliance not achieved with RDIS-6, RDIS-7 and RDIS-8 is not achieved: Non-complying. FS368.034 |

| Submitter Name | Submission Number | Oppose/ Support | Submission | Reason |
|---|--|-------------------------------|--|---|
| <p>Setar Thirty Six Limited</p> <p>Matauri Trustee Limited</p> <p>P S Yates Family Trust</p> | <p>S168.058</p> <p>S243.075</p> <p>S333.050</p> | <p>Support in Part</p> | <p>The rule appropriately recognises that that limited rural lifestyle subdivision may be a sustainable use of land resources, particularly where they are degraded and unsuited to productive use and significant environmental gains can be made. In these circumstances, subdivision, through an injection of capital and introduction of a 'community of care' and legal protection/going obligations, allows for restoration and enhancement opportunities to be implemented and maintained in perpetuity.</p> <p>...</p> <p>The balance lot requirement of 40ha is unnecessary and will negate the effectiveness of the rule on smaller sites which may have equal or better ecological values worthy of protection.</p> | <p>Amend Rule SUB-R6 by: 1. Deleting RDIS-3; and 2. Amending RDIS-6 as follows: All proposed new environmental allotments are to be a minimum size of 2ha in area and the balance lot must be greater than 40ha.</p> <p>FS368.035 FS368.036 FS368.037</p> |

| Submitter Name | Submission Number | Oppose/ Support | Submission | Reason |
|---|---|------------------------|--|--|
| The Shooting Box Limited | S187.050 FS368.038 | Support | The balance lot requirement of 40ha is unnecessary and will negate the effectiveness of the rule on smaller sites which may have equal or better ecological values worthy of protection. | Amend Rule SUB-R6 by: 1. Deleting RDIS-3; and 2. Amending RDIS-6 as follows: All proposed new environmental allotments are to be a minimum size of 2ha in area and the balance lot must be greater than 40ha. |
| Martin John Yuretich Joel Vieviorka Rua Hatu Trust | S40.016 S41.016 S377.001 | Support in Part | The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone. The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision. With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks. It is correct to protect rural productive potential, but this can be achieved without imposing a total restriction on rural lifestyle properties. | Amend allotment sizes, perhaps with a limited number of allotments of a minimum of 8000m ² or 1ha, then 4ha generally after that. Smaller lot sizes should apply for properties (or parts thereof) that do not consist of highly productive land. ... Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision. FS368.039 FS368.040 FS368.041 |

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
|---------------------------------|-------------------|----------------|--|---|
| NFS Farms Limited | S151.002 | Support | [SUB-R7] Enables integrated subdivision opportunities that complements sustainable environmental management, including the protection of natural character, landscape, amenity, heritage and cultural values. | Retain SUB-R7 (Management Plan Subdivision) as it relates to the Rural Production zone... FS368.042 |
| Bentzen Farm Limited | S167.058 | Support | The rule [SUB-R7] appropriately recognises that that limited rural lifestyle subdivision may be a sustainable use of land resources, particularly where they are degraded and unsuited to productive use and significant environmental gains can be made. In these circumstances, subdivision allows for restoration and enhancement opportunities to be implemented and maintained in perpetuity. | Retain Rule SUB-R7. FS368.043 FS368.044 FS368.045 FS368.046 FS368.047 |
| Setar Thirty Six Limited | S168.059 | | | |
| The Shooting Box Limited | S187.051 | | | |
| Matauri Trust Limited | S243.076 | | | |
| P S Yates Family Trust | S333.051 | | | |
| Jeanette McGlashan | S17.001 | Support | Rural production can still be achieved in land holdings smaller than 8 ha. Do not disadvantage existing land holders and rate payers. The smaller lot sizes gives flexibility to land owners to meet needs of the land and also of families in the midst of a housing crisis especially prevalent in the far north district... | Amend the minimum allotment sizes for Rural Production Zone, to allow smaller lot sizes. Seeks that existing (Operative District Plan) allotment sizes for the Rural Production Zone are reinstated (inferred). FS368.132 |

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
|--|-------------------|--|--|---|
| Joel Vieviorka | S41.001 | Support | The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone. The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision. | Amend allotment sizes in the Rural Production zone, perhaps with a limited number of allotments with minimum areas of 8000m ² or 1ha, then 4ha generally after that. Smaller lot sizes should apply for properties (or parts thereof) that do not consist of highly productive land. ... Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision. |
| Strand Homes Ltd/Okahu Developments Ltd | S77.001 | FS368.048 FS368.049 FS368.050 FS368.051 FS368.052 FS368.053 FS368.054 FS368.055 FS368.056 FS368.057 FS368.058 FS364.059 | | |
| Trevor John Ashford | S146.001 | | | |
| Shanon Garton | S161.001 | | | |
| Julianne Sally Bainbridge | S163.001 | | | |
| Sean Jozef Vercammen | S395.001 | | | |
| Kerry-Anne Smith | S410.001 | | | |
| Roger Myles Smith | S411.001 | | | |
| John Joseph and Jacqueline Elizabeth Matthews | S439.001 | | | |
| L J King Limited | S464.001 | | | |
| LJ King Limited | S543.001 | | | |
| LJ King Limited | S547.001 | | | |

| Submitter Name | Submission Number | Oppose/ Support | Submission | Reason |
|---|---|--------------------|---|---|
| Helmut Friedrich Paul Letz and Angelika Eveline Letz Elbury Holdings Elbury Holdings Kelvin Richard Horsford Rodney S Gates and Cherie R Gates | S470.001 S485.001 S541.001 S544.001 S569.001 | | | FS368.060 FS368.061 FS368.062 FS368.063 FS368.064 |
| Andrea Vicki Thomas | S43.001 | Support | <p>Submitter opposes the new sub-division rules requiring a minimum lot size of 8 ha as a discretionary activity in the Rural Production zone, without a management plan. This will restrict the ability to create small rural lots. These blocks are too large for lifestyle blocks and too small to be productive so that a living could be had. This will also no longer allow rural landowners to provide small blocks for young families to build on And enter the property market. Subdividing off 8ha will diminish the productive capacity of a farm more than a smaller block.</p> | <p>Retain current minimum lot size of 4ha as a discretionary activity in the Rural Production zone.</p> <p>FS368.065</p> |

| Submitter Name | Submission Number | Oppose/ Support | Submission | Reason |
|---|-------------------|-----------------|---|---|
| Far North Real Estate 2010 Limited | S53.001 | Support | Retain the ODP minimum allotment sizes and do not increase the discretionary activity standard in the Rural Production zone to 8 hectares. | Retain the ODP minimum allotment sizes and do not increase the discretionary activity standard in the Rural Production zone to 8 hectares. FS368.066 |
| Brian and Katherine Susan Hutching | S71.001 | Support | The submitter considers that the minimum lot sizes in the Rural Production Zone that have already been subdivided down to a size that are not economically viable as rural production units could be further subdivided. There are areas in the existing Rural Production where subdivisions have occurred, resulting in small lots not suitable for Rural Production purposes. Generally, these properties are residential in nature but on lot sizes larger than standard residential sites, varying between 1 & 2 hectares. The ability to further subdivide these properties to a minimum of 3,000 or 4,000m ² would make land available where subdivision has already occurred, preventing larger allotments from being subdivided and keeping higher density development grouped in areas already developed. | Amend the provision to allow further subdivision of existing lots if they are below an area between 1 & 2 hectares. The ability to further subdivide these properties to a minimum of 3,000 or 4,000m ² would make land available where subdivision has already occurred, preventing larger allotments from being subdivided that are viable as a rural production unit in the Rural Production Zone. FS368.067 |

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
|---|---|----------------|--|---|
| Amber Hookway Wilson Hookway Danielle Hookway Lianne Kennedy Allan Hookway | S261.004 S264.004 S309.004 S310.004 S311.004 | Support | The increased lot size for Rural Production Zone appears to be double the previous size. I believe this is an unreasonable size increase. This no longer allows owners to retire in their existing homes with a smaller area of land and reduces the ability for rural landowners to provide small blocks for family members to build on and enter the property market | Amend to reinstate the Operative District Plan rule for minimum lot size on the Rural Production Zone (Table 13.7.2.1), with 20 ha minimum lot size as a controlled activity. FS368.068 FS368.069 FS368.070 FS368.071 FS368.072 |
| Manu Burkhardt Macrae | S279.002 | Support | Opposes minimum lot size of 40ha in Rural Production Zone as a controlled activity, in particular for land which is not highly productive land as described in the NPS Highly Productive Land 2022. | Amend minimum allotment size to 20 ha in the Rural Production Zone, as a controlled activity (as per the Operative District Plan), in particular for land which is not highly productive land as described in the NPS Highly Productive Land 2022. FS368.073 |

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
|-------------------------------|-------------------|----------------|---|---|
| FNR Properties Limited | S334.002 | Support | Do not support the RPZ provisions relating to minimum allotment size. Such a substantial reduction in the permitted residential intensity threshold in the RPZ is extremely heavy-handed and will result in significant adverse effects on the socioeconomic wellbeing of the Far North District. Reasons are as follows: Does not recognise the immediate need for more housing in the district. Imposing such restrictions on residential intensity will only contribute further to the current housing crisis that is being observed both locally and nationwide. Providing more options for residential intensity as a Controlled, Restricted Discretionary, and Discretionary Activity would be more appropriate as this will enable such development to occur in the RPZ while providing for case by case consideration of any proposed residential activity within the context of the subject site and immediate surrounding environment (as opposed to a 'one size fits all' approach). | Amend SUB-S1 Minimum Allotment Sizes (Rural Production) and reduce the minimum lot sizes in the RPZ, and/or to provide for more options for subdivision in the RPZ as a Controlled, Restricted Discretionary, and Discretionary Activity. FS368.074 |

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
|----------------------------|-------------------|----------------|---|---|
| Sapphire Surveyors Limited | S348.001 | Support | <p>The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone. The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision. With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks. It is correct to protect rural productive potential, but this can be achieved without imposing a total restriction on rural lifestyle properties.</p> | <p>Amend allotment sizes in the Rural Production zone, perhaps with a limited number of allotments with minimum areas of 8000m² or 1ha, then 4ha generally after that. Smaller lot sizes should apply for properties (or parts thereof) that do not consist of highly productive land.</p> <p>Perhaps there should be more focus on the size of the balance parcel - subdividing off 4ha to leave a 10ha balance parcel does not protect productivity, while subdividing 1ha off a 200ha block has next to no effect, especially if the smaller block consists of bush.</p> <p>Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision.</p> <p>FS368.075</p> |

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
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| <p>Sean Frieling Leah Frieling</p> | <p>S357.010 S358.010</p> | <p>Support</p> | <p>The new subdivision rules will severely restrict the ability to create small rural lots in the rural production zone. The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and the less productive land when it comes to subdivision. It is correct to protect rural productive potential, but this can be achieved without imposing a total restriction on rural lifestyle properties. We do not support the large title sizes in the rural zone. We submit that subdivision should allow lots to 4ha or smaller, and that the subdivision of smaller lots around existing houses be provided for.</p> | <p>Amend standard SUB-S1 in relation to the Rural Production Zone, to generally allow lots of 4ha, and allow lots less than 4ha around existing houses.</p> <p>FS368.076 FS367.077</p> |

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
|--------------------|-------------------|----------------|--|---|
| Michael Foy | S472.010 | Support | <p>The new subdivision rules, requiring a minimum lot size of 8ha (without a management plan) will severely restrict the ability to create small rural lots in the rural production zone. The effects of this restriction include: - A reduction in vitality for rural communities - no longer allowing farmers to retire in their existing homes with a small area of land - the creation of 8ha blocks, which are too large for lifestyle blocks and too small to be productive - no longer allowing for the creation of appropriately sized and desirable lifestyle blocks - reduce the ability for rural landowners to provide small blocks for young family members to build on and enter the property market (this is contrary to Council policies in relation to affordable housing reduced capacity for farmers to decrease their debt burdens by subdividing off small block of land that do not significantly add to the productivity of their farm. Where it is necessary to reduce debt by subdivision, subdividing off 8ha will diminish the productive capacity of the farm more than a smaller block.</p> | <p>Amend standard SUB-S1 in relation to the Rural Production Zone, to generally allow lots of 4ha, and allow lots less than 4ha around existing houses.</p> <p>FS368.078</p> |

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
|---|---|--|---|--|
| Elbury Holdings L J King Limited | S485.022 S519.022 S541.020 S543.021 S547.021 | Support FS368.079 FS368.080 FS368.081 FS368.082 FS368.083 | We do not support the large title sizes in the rural zone and submit that the subdivision of smaller lots around existing houses be provided for. | Amend standard SUB-S1 in relation to the Rural Production Zone, to generally allow lots of 4ha, and allow lots less than 4ha around existing houses. |
| Northland Planning and Development 202 Limited | S502.092 | Support in Part | The economic viability in relation to productive areas for primary production varies a great deal depending on whether the use is for horticulture, dairy farming or sheep and beef grazing to name a few. It is also noted that smaller horticultural properties are more economically viable when they have the benefit of versatile soils, access to water for irrigation and access to a workforce... | Amend SUB-S1 to provide for: Rural Production Controlled activity 20ha, Restricted discretionary activity 8ha and Discretionary activity 4ha Rural lifestyle discretionary activity 1ha. FS368.084 |

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
|----------------|-------------------|----------------|---|---|
| Trent Simpkin | S28.001 | Support | Opposes that the Rural Production minimum lot sizes have been increased so much. Doubling the size of the controlled activity from 20ha min to 40ha min, and also the discretionary going from 4ha min to 8ha min (from the Operative District Plan), and also removing all other options for Titles pre-2000. Where is the new land coming from? (because it's clear across the entire district that land zoning has been choked rather than increased). Some other councils are allowing Rural 'clusters' similar to what the old DP allowed. This means that New Zealanders can still buy a small rural block of land to live on rather than having a massive 8Ha lot to keep (or not keep!) | <p>Insert a 'cluster option' for rural areas to be subdivided - suggest 4 x 4,000m2 sections per parent lot (which means the bulk of the farm is retained in one large lot). Amend minimum lot sizes to 20 ha minimum (as a controlled activity), and 4 ha minimum (as a discretionary activity).</p> <p>F5368.085</p> |

| Submitter Name | Submission Number | Oppose/ Support | Submission | Reason |
|--|--|--------------------|---|--|
| Bentzen Farm Limited Setar Thirty Six Limited Wendover Two Limited Matauri Trustee Limited P S Yates Family Trust | S167.062 and 167.063 S168.063 and 168.064 S222.056 and S222.057 S243.080 and S243.081 S333.055 and S333.056 | Support | <p>On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole.</p> <p>The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots.</p> | <p>Amend Rule SUB-R20 as follows: SUB-R20 Subdivision of a site within the Coastal Environment (excluding Outstanding Natural Character Areas) (where any boundary of a new lot to be created (excluding boundary adjustments) is within that part of the existing site covered by the overlay)</p> <p>FS368.086 FS368.087 FS368.088 FS368.089 FS368.090 FS368.091 FS368.092 FS368.093 FS368.094 FS368.095</p> |

| Submitter Name | Submission Number | Oppose/ Support | Submission | Reason |
|--|-----------------------------|--------------------|---|--|
| The Shooting Box Limited | S187.055 and 187.056 | Support | The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots. | Amend Rule SUB-R20 as follows: SUB-R20 Subdivision of a site within the Coastal Environment (excluding Outstanding Natural Character Areas) (where any boundary of a new lot to be created (excluding boundary adjustments) is within that part of the existing site covered by the overlay) FS368.096 FS368.097 |
| Ed and Inge Amsler | S341.014 | Support | Subdivision in the Coastal Environment should align to the underlying zone provisions for subdivision allotment sizes. As a Discretionary Activity SUB-R20 includes no specific criteria to consider. It seems more appropriate for any subdivision within the Coastal Environment to assess the characteristics and qualities within that area, with specific assessment criteria as opposed to a blanket discretionary activity status. | Amend subdivision within a Coastal Environment to have alignment to the underlying zoning of a site and consider the intent of the zone and its minimum allotment sizes. FS368.098 |
| Northland Planning and Development 2020 Limited | S502.087 | Support | Clarification is sought that regardless of the lot size if the site or part of the site is located within the Coastal Environment the activity status is Discretionary. | Amend SUB-R20 to clarify if the site or part of the site is located within the Coastal Environment the activity status is Discretionary regardless of lot size. FS368.099 |

Plan Section – Coastal Environment

| Submitter Name | Submission Number | Oppose/ Support | Submission | Reason |
|---------------------------------|------------------------------|--|--|--|
| Bentzen Farm Limited | S167.066 and S167.067 | Support FS368.100 FS368.101 FS368.102 FS368.103 FS368.104 FS368.105 FS368.106 FS368.107 FS368.108 FS368.109 | This objective lacks specificity as to the outcome sought for the coastal environment and, together with Objective CE-02, fails to take into account the full scope of resources in the coastal environment and the range of existing and potential new sustainable land uses able to be supported in the coastal environment (including opportunities for restoration or rehabilitation of modified or degraded areas of natural character through land use and subdivision). | Delete Objectives CE-O1 and CE-02 and replace with the following: Objective CE-O1 Subdivision, use and development in the Coastal Environment: a. Enables people and their communities to provide for the social, economic, and cultural well-being and their health and safety; b. Maintains or restores the integrity, form, functioning and resilience of the Coastal Environment; and c. Protects the indigenous biodiversity values of the Coastal Environment in relation to the biodiversity values present; and d. Preserves the natural character of the Coastal Environment in relation to the level of natural character present; and e. Protects natural features and landscapes values of the Coastal Environment in relation to the level of natural feature and landscape values present; and |
| The Shooting Box Limited | S187.058 and 187.099 | | | |
| Wendover Two Limited | S222.058 and S222.059 | | | |
| Matauri Trustee Limited | S243.084 and S243.085 | | | |
| P S Yates Family Trust | S333.058 | | | |
| Setar Thirty Six Limited | S168.067 | | | |

| Submitter Name | Submission Number | Oppose/ Support | Submission | Reason |
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| | | | | <p>f. Recognises and provides for the relationship of tāngata whenua with the Coastal Environment; and</p> <p>g. Maintains and enhances public open space and recreation opportunities in the Coastal Environment; and</p> <p>h. Manages coastal hazard risks, including the long-term projected effects of climate change; and</p> <p>i. Protects and enhances historic heritage values; and</p> <p>j. Avoids sprawling or sporadic patterns of development and enabling consolidation of existing settlements.</p> <p>k. Where appropriate, promotes opportunities for restoration or rehabilitation of modified or degraded areas of natural character.</p> |

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
|---|--|----------------|--|---|
| Waiaua Bay Farm Limited | S463.053 | Support | It is considered inappropriate to require all significant adverse effects to be avoided in areas of the coastal environment outside of "significant" (in a RMA section 6 sense) ONC, ONL and ONF areas. It is appropriate to facilitate an assessment of the merits of proposals with such effects rather than requiring outright avoidance as a first principle policy setting. | Amend Policy CE-P3 as follows: CE-P3 Avoid significant adverse effects and avoid, remedy or mitigate other Manage any adverse effects of land use and subdivision on the characteristics and qualities of the coastal environment in locations not identified as: a. outstanding natural character; b. ONL; and c. ONF. FS368.110 |
| Bentzen Farm Limited The Shooting Box Limited Wendover Two Limited Matauri Trustee Limited P S Yates Family Trust Setar Thirty Six Limited | S167.072 S187.062 S222.064 S243.090 S333.063 S168.071 | Support | Policy CE-P9 seeks to prohibit land use and subdivision that would result in any loss and/or destruction of the characteristics and qualities in outstanding natural character areas. This policy is not implemented by any rules and, moreover, is inconsistent with Policy CE-P2 which better gives effect to the NZCPS. | Delete Policy CE-P9. FS368.111 FS368.112 FS368.113 FS368.114 FS368.115 FS368.116 |

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
|---|-------------------|----------------|--|---|
| Northland Federated Farmers of New Zealand | S421.185 | Support | <p>Federated Farmers does not support policy CEP9. The policy is inconsistent with section 6 of the Resource Management Act 1991 in that it appears to prohibit all land use and subdivision from all outstanding natural character areas located in the coastal environment. The policy as proposed is overly restrictive and does not provide for appropriate subdivision and land use to occur. It is not possible to undertake the sustainable management of the coastal environment if there is no framework that allows for appropriate activities with no more than minor effects to occur.</p> | <p>Delete Policy CE-P9.</p> <p>FS368.117</p> |

| Submitter Name | Submission Number | Oppose/ Support | Submission | Reason |
|---|--|--------------------|---|---|
| Bentzen Farm Limited The Shooting Box Limited Wendover Two Limited Matauri Trustee Limited P S Yates Family Trust Setar Thirty Six Limited | S167.073 S187.063 S222.065 S243.091 S333.064 S168.072 | Support | <p>Policy CE-P10 seeks to manage land use and subdivision to preserve and protect the natural character of the coastal environment, and to address the effects of the activity requiring resource consent, including (but not limited to) consideration of a range of matters "where relevant to the application". This is not a policy but a method of assessment, and therefore more appropriately an assessment criterion. Non-complying and discretionary activity applications should be assessed against objectives and policies which should be a clear expression of a desired outcome - not a way to achieve an unspecified outcome as is this policy.</p> | Delete Policy CE-P10. FS368.118 FS368.119 FS368.120 FS368.121 FS368.122 FS368.123 |

| Submitter Name | Submission Number | Oppose/Support | Submission | Reason |
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| Suzanne Linda Ashmore Cavalli Properties Limited | S169.002 S177.002 | Support | Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Rule CE-R1 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment | Amend Rule CE-R1 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF FS368.124 FS368.125 |
| Willam Goodfellow Ian Jepson Ricky Faesen Kloet Philip Thornton Mark John Wyborn | S493.008 S494.008 S495.009 S496.006 S497.006 | Support | The submitter also considers that the activity status and standards imposed on activities within the coastal environment are unnecessarily onerous. These include imitations on setback for buildings from MHWS, and limitations over the area, height, colour and reflectivity of buildings | Amend provisions within the plan that impose limitations on the area of new buildings located within the coastal environment overlay be deleted. FS368.126 FS368.127 FS368.128 FS368.129 FS368.130 |
| Omata Estate | S548.003 | Support in Part | The PDP should provide for new buildings and structures to be established on rural sites within the Coastal Environment through a Restricted Discretionary resource consent where it can be determined that the adverse effects of development can be appropriately avoided, remedied, or mitigated. | Amend CE-R1 to provide for the establishment of new buildings on structures outside of an urban zone (not within a high natural character area or outstanding natural character area) as a restricted discretionary activity with associated matters of discretion and assessment criteria. FS368.131 |