



Kerikeri Service Centre  
20 OCT 2022

Remember  
submissions  
close at 5pm,  
Friday 21  
October 2022

## Proposed District Plan submission form

Clause 6 of Schedule 1, Resource Management Act 1991

Feel free to add more pages to your submission to provide a fuller response.

Form 5: Submission on Proposed Far North District Plan

TO: Far North District Council

This is a submission on the Proposed District Plan for the Far North District.

### 1. Submitter details:

Full Name:	Denis Thomson		
Company / Organisation Name: (if applicable)	Thomson Survey Ltd		
Contact person (if different):			
Full Postal Address:	P O Box 372		
	Kerikeri 0472		
Phone contact:	Mobile: 021 407 732	Home:	Work: 407 7360
Email (please print):	denis@tsurvey.co.nz		

2. (Please select one of the two options below)

- I **could not** gain an advantage in trade competition through this submission  
 I **could** gain an advantage in trade competition through this submission

*If you could gain an advantage in trade competition through this submission, please complete point 3 below*

3.  I **am** directly affected by an effect of the subject matter of the submission that:  
 (A) Adversely affects the environment; and  
 (B) Does not relate to trade competition or the effect of trade competition
- I **am not** directly affected by an effect of the subject matter of the submission that:  
 (A) Adversely affects the environment; and  
 (B) Does not relate to trade competition or the effect of trade competition

*Note: if you are a person who could gain 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*

**The specific provisions of the Plan that my submission relates to are:**

*(please provide details including the reference number of the specific provision you are submitting on)*

Rural Production Zone policies.

Confirm your position:  Support  Support In-part  Oppose  
*(please tick relevant box)*



**My submission is:**

*(Include details and reasons for your position)*

The intent of the policies is made abundantly clear by their wording – nothing but rural production use is enabled or encouraged despite the suitability of the land for productive use or otherwise; and the productive capacity of highly productive land is not to be compromised in any way, shape, form or extent, no matter what. I disagree with that intent and oppose strongly the punitive and restrictive wording of the policies.

There will be existing property and land use in the Rural Production Zone already contrary to the policies. There are permitted activities listed in the zone rules that will be contrary to some of the policies – which is illogical and not consistent with the Resource Management Act. An example is a permitted rule providing for a building. That building may be located on highly productive land / highly versatile soils. The effect is negligible because of the amount of land removed from productive use being negligible, but the policy uses the word ‘avoid’, therefore the building is contrary to the policy.

The problem with some of the policies as written is that they attempt to stop almost any activity in the zone except farming. This is not effects based, is an inconsistent approach when compared with other zones, is overly stifling of the rural community’s ability to remain vibrant and viable; and not consistent with the zone’s own rule suite.

RPROZ-P2 should also provide for/enable a range of compatible activities that may not support primary production but which might establish without adversely affecting the ability to continue with primary production. This would be more consistent with the rule framework.

**I seek the following decision from the Council:**

*(Give precise details. If seeking amendments, how would you like to see the provision amended?)*

Amend the Rural Production Zone policies as follows:

RPROZ-P2 amended by adding a part (c):

Enabling activities that do not support primary production activities but where they do not adversely affect the ability of the site to continue with primary production use.

S199.001

RPROZ-P5 amended to read:

Manage land use so that:

- a. It is compatible with the purpose, character and amenity of the Rural Production Zone;
- b. It enables activities with a functional need to locate in the Rural Production Zone;
- c. Does not result in a more than minor loss of productive capacity of highly productive land;
- d. Does not exacerbate natural hazards; and
- e. Can provide appropriate on-site infrastructure.

S199.002

RPROZ-6 relates to subdivision only and probably has no place in the Zone policies. I suggest it is deleted from the zone policies. If it is to remain, amend as follows (removing the concept of “avoid” and associated negative, restrictive connotations):

S199.003

Manage subdivision so that:

- a. the loss of highly productive land for use by farming activities is avoided, where possible, and where avoidance is not possible, the loss has only minor impact on the availability of highly productive land for productive purposes;
- b. the land is not fragmented into parcel sizes that are no longer able to support farming activities, taking into account .....(remainder unchanged);
- c. smaller lot sizes and rural lifestyle living is encouraged where there is an environmental benefit.

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Yes

No



Do you wish to present your submission via Microsoft Teams?

Yes  No

**Signature of submitter:**

*(or person authorised to sign on behalf of submitter)*

*Odhamsan*  
Date: *19 October 22*

*(A signature is not required if you are making your submission by electronic means)*

**Important information:**

1. The Council must receive this submission before the closing date and time for submissions (5pm 21 October 2022)
2. Please note that submissions, including your name and contact details are treated as public documents and will be made available on council's website. Your submission will only be used for the purpose of the District Plan Review.
3. Submitters who indicate they wish to speak at the hearing will be emailed a copy of the planning officers report (please ensure you include an email address on this submission form).

**Send your submission to:**

**Post to:** Proposed District Plan  
Strategic Planning and Policy, Far North District Council  
Far North District Council,  
Private Bag 752  
KAIKOHE 0400

**Email to:** [pdp@fndc.govt.nz](mailto:pdp@fndc.govt.nz)

Or you can also deliver this submission form to any Far North District Council service centre or library, from 8am – 5pm Monday to Friday.

**Submissions close 5pm, 21 October 2022**

**Please refer to [pdp.fndc.govt.nz](http://pdp.fndc.govt.nz) for further information and updates.**

*Please note that original documents will not be returned. Please retain copies for your file.*

**Note to person making submission**

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious
- It discloses no reasonable or relevant case
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- It contains offensive language
- It is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.



**SUBMISSION NUMBER**