

**BEFORE HEARINGS COMMISSIONERS APPOINTED
BY THE FAR NORTH DISTRICT COUNCIL**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on the Proposed
Far North District Plan

SUBMITTER Waipapa Pine Limited and Adrian Broughton Trust
[Novated to Fletcher Building Limited]

HEARING TOPIC: Hearing 13 – Hazards and Risks

STATEMENT OF PLANNING EVIDENCE OF ANDREW CHRISTOPHER MCPHEE

9 June 2025

INTRODUCTION

1. My name is Andrew Christopher McPhee. I am a Director / Consultant Planner at Sanson and Associates Limited and Bay of Islands Planning (2022) Limited.
2. I have been engaged by Waipapa Pine Limited¹ (**WPL**) to provide evidence in support of its further submission to the Proposed Far North District Plan (**PDP**). WPL is a wholly owned subsidiary of Fletcher Building Limited.
3. WPL transferred representation rights to Fletcher Building Limited in a letter to Council on 4 September 2024, following a sale and purchase of the business agreement (see Attachment 1).
4. I note that while the Environment Court Code of Conduct does not apply to a Council hearing, I am familiar with the principles of the code and have followed these in preparing this evidence.

QUALIFICATIONS AND EXPERIENCE

5. I graduated from The University of Auckland in 2007 with a Bachelor of Planning (Honours).
6. I began my planning career with Boffa Miskell, where I was a graduate planner until 2009. The same year I joined the Auckland Regional Council in the Policy Implementation Team. When the Auckland Councils amalgamated in 2010, I worked in a number of planning roles, leaving in 2015 as a Principal Planner in the Central and Island Planning Team.
7. I joined the Far North District Council (**FNDC**) in 2015 as a Senior Policy Planner working principally on the review of the district plan. I left FNDC in December 2023 and joined Sanson and Associates Limited and Bay of Islands Planning (2022) Limited with my co-director Steven Sanson.
8. I have been involved in a number of plan change and resource consent hearing processes in my time at Auckland Council, including as the planning lead for a number of topics for the Auckland Unitary Plan process. At FNDC I project managed private plan change 22 and was the portfolio lead for a number of topics for the PDP.
9. I am a full member of the New Zealand Planning Institute and a member of the Resource Management Law Association. In February 2024, I was certified with excellence as a commissioner under the Ministry for the Environment's Making Good Decisions programme.

¹ Submission 342 was originally lodged by Waipapa Pine Limited and Adrian Broughton Trust

SCOPE OF EVIDENCE

10. Hearing 13 addresses submission points relating to the PDP – Hazards and Risk topics. The s42A reports splits these matters into two reports in line with the structure of the PDP.
 - a) Hazardous Substances
 - b) Natural Hazards
11. I have been asked by WPL to provide expert planning evidence arising from their submission points seeking amendments to Rules NH-R2 and NH-R3 within the Natural Hazards Chapter, and HS-R2 within the Hazardous Substances chapter.
12. I note that the WPL site is located south of the existing Industrial zone in Waipapa and is currently zoned Rural Production in the operative district plan. Through the notified PDP the WPL site is proposed to be rezoned Heavy Industrial. The rezoning hearings are scheduled for October 2025.
13. In preparing this evidence, I have reviewed the s42A Report for the Natural Hazards and Hazardous Substances chapters. I have adhered to the instructions of hearing Minute 1 ‘take a lead from the s42A Report in terms of content of evidence, specifically that evidence highlights areas of agreement and disagreement with the s42A Report, outlines any changes in Plan wording proposed (along with the rationale for these changes) together with an assessment pursuant to S32AA of the RMA’.

ROLE AND FUNCTION OF THE HEAVY INDUSTRIAL ZONE

14. While relayed in previous pieces of evidence produced for WPL it is important to note that the Heavy Industrial zone is a new zone promoted through the PDP. In respect to Waipapa, the proposed Heavy Industrial zone is a mix of ‘Industrial’ and ‘Rural Production’ zoned land in the operative district plan. In respect of the WPL site, it is currently zoned Rural Production where industrial activities have been lawfully established.
15. My evidence relating to Hearing 6/7 for Noise and Hearing 9 Rural Production emphasised the importance of the Heavy Industrial zone in the PDP, which seeks to manage and protect industrial activities, in particular from land sterilisation and reverse sensitivity effects.
16. The overview in the Heavy Industrial zone chapter of the PDP recognises that it accommodates a range of activities which contribute to the economic wellbeing of the district but may produce offensive or objectionable environmental effects including odour, dust or noise.

17. Finding appropriate land to zone Heavy Industrial is often a challenge as it has to be located sufficiently away from sensitive activities and has to be appropriately serviced by infrastructure. It is therefore important that these areas are managed and protected from surrounding land uses that can sterilise activities designed to be undertaken in this zone.
18. The Heavy Industrial zoned land in Waipapa represents the extent of Heavy Industrial zoned land in the Kerikeri/Waipapa area. As such, it is important that the activities provided for in this zone are enabled to continue relatively unencumbered.
19. The s42A Report Officer's written reply for Rural zones - 3 March 2025 (**ROR**) articulates the importance of protecting activities enabled in the Heavy Industrial zone from reverse sensitivity issues². An analysis was undertaken by the FNDC GIS team assessing the number of properties that would be affected by a setback imposed in the Rural Production zone, concluding that most have sufficient land area outside of the setback to establish any new sensitive activities.
20. The report writer states that:
- The potential for reverse sensitivity effects resulting from activities establishing in the Rural Production zone to impact existing activities in the Heavy Industrial zone is similar to the potential for issues at the interface between the Rural Production zone and the Mineral Extraction Zone;
 - The scale of this interface (and therefore the number of impacted properties) is relatively limited when considered in the context of the amount of land zoned Rural Production zone across the Far North district.
21. The ROR concludes that the benefits to protecting the Heavy Industrial zone from being sterilised or otherwise impacted by reverse sensitivity effects outweigh the potential restrictions on the ability of landowners in the Rural Production zone to construct or establish sensitive activities.
22. The ROR now recommends a new setback standard in the Rural Production zone to restrict the location of new sensitive activities within 100m of the Heavy Industrial zone³.

THE REGIONAL POLICY STATEMENT

23. The NRC submission appropriately groups rural production, mineral extraction and industrial zones and the need to ensure that strengthened reverse sensitivity provisions are applied to protect those activities. Objective 3.6 of the Regional Policy Statement for Northland (**RPS**) addresses economic activities in respect of reverse sensitivity and sterilisation. The objective seeks to ensure "*The viability of land and activities important*

² S42A Report Writers Right of Reply: Paragraph 159

³ S42A Report Writers Right of Reply: Appendix 1 Officer's recommended amendments (Rural Production Zone, Right of Reply): Pages 26-27

for Northland's economy is protected from the negative impacts of new subdivision, use and development, with particular emphasis on either:

- (a) Reverse sensitivity for existing:*
 - (i) Primary production activities;*
 - (ii) Industrial and commercial activities;*
 - (iii) Mining*; or*
 - (iv) Existing and planned regionally significant infrastructure; or*
- (b) Sterilisation of:*
 - (i) Land with regionally significant mineral resources; or*
 - (ii) Land which is likely to be used for regionally significant infrastructure.*

**Includes aggregates and other minerals."*

24. Policy 5.1.3 of the RPS adds the requirement to *"avoid the adverse effects, including reverse sensitivity effects of new subdivision, use and development, particularly residential development on the following:*

- (iii) Primary production activities in primary production zones (including within the coastal marine area);*
- (iv) Commercial and industrial activities in commercial and industrial zones;*
- (v) The operation, maintenance or upgrading of existing or planned regionally significant infrastructure; and*
- (vi) The use and development of regionally significant mineral resources"*

NATURAL HAZARDS

25. The WPL site and other Heavy Industrial landholdings in this location are identified as being affected by river flood hazards in proximity of the river west of the properties. As can be seen from Figure 1 below, the extent of the river flooding hazard covers only a small quantum of land in the Heavy Industrial zone in Waipapa. WPL seek the deletion of the 10m² threshold that applies to above ground buildings or structures triggered in rules NH-R2 and NH-R3.
26. It is important to note that the Natural Hazard provisions apply to all zones within the district and are not nuanced to consider the uses enabled and provided for in each zone. By way of example, most zones within the PDP provide in some way for 'sensitive activities', the industrial zones (Light and Heavy) do not.
27. I consider any 'risk' associated with new buildings or structures within the Heavy Industrial zone is diminished due to there being no provision for sensitive activities, and any effects associated with the river flood hazard can be addressed through design at building consent.

28. The reporting officer in the s42A Report states *“I agree with these submitters that the 10m² threshold in NH-R2 (which is the threshold in NH-R3 PER-1 referred to in the rules) seems somewhat restrictive and somewhat arbitrary. However, the intent of the permitted activity thresholds in NH-R3 (which are referred to in NH-R2) is to ensure new buildings and extensions and additions to existing buildings do not exacerbate natural hazard risk in accordance with the relevant objectives and policies...”*⁴
29. While I understand that Council needs to be conservative in identifying a permitted activity threshold for coverage, the proposed application is generic across all zones, assuming all zones to be the same. Deferring the design of any new building or structure in the river flood hazard allows for flexible, tailored, and expert-led solutions that are responsive to the unique characteristics of each site.
30. To contrast the proposed approach in the PDP, the operative district plan allows 100% coverage of a site as a permitted activity within the industrial zone, provided that the disposal of collected stormwater from the roof of all new buildings and new impervious surfaces is within an existing consented urban stormwater management plan or discharge consent. In that sense, there is no equivalent rule in the operative district plan, yet flood risk matters have been appropriately considered / assessed without any known increase in risk or effects from flooding.
31. It is therefore appropriate to consider that relying on the existing approach is far more certain and efficient than the PDP standard which is set on arbitrary matters.
32. The areas of the Heavy Industrial zone affected by the River Flood Hazard, and NH-R2 and NH-R3, are already for the most part ‘impervious’ (see Figure 1). There appears therefore to be no relevant function for a rule requiring consent for a new building on a site that is already impervious when PER-2 of Rule of NH-R3 still applies where the building or structure is not located within or does not alter or divert an overland flow path.

⁴ S42A Report Natural Hazards: Page 41

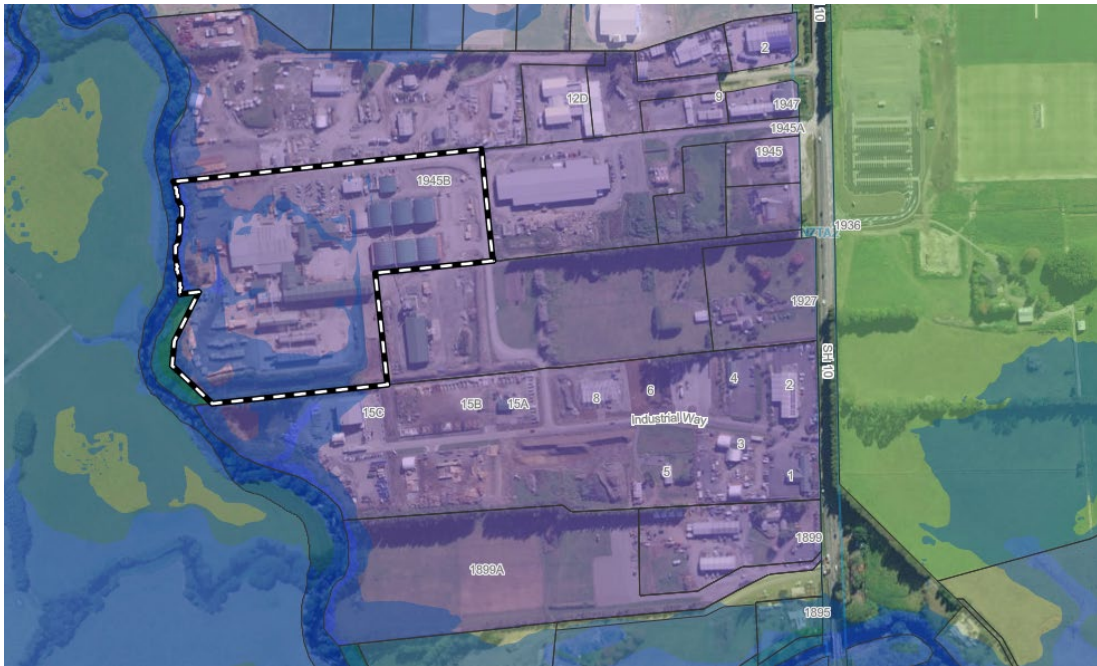


Figure 1: Heavy Industrial zoned land in Waipapa

HAZARDOUS SUBSTANCES

33. The chapter seeks to manage the risks and effects of hazardous substances while recognising the benefits of activities that store, use and dispose hazardous substances. While not explicitly stated in the PDP, the Heavy Industrial zone would appear to be the most appropriate location for the storage, use or disposal of hazardous substances as it is the only zone in the PDP that anticipates the production of offensive or objectionable environmental effects. It also anticipates sufficient distance from other zones containing 'sensitive activities' to reduce the likelihood that reverse sensitivity will impact the role and function of the Heavy Industrial zone.
34. As discussed earlier in my evidence, the role and function of the Heavy Industrial zone needs to be protected. The purpose of a Heavy Industrial zone is to accommodate activities that may have off-site effects but are necessary for the district's economy, including hazardous substances. To restrict these activities with a large internal setback from sensitive activities within an adjacent Rural Production zone undermines the very intent of the zone.
35. Many of the activities within the proposed Heavy Industrial zone at Waipapa have been operating for some time and do so under existing consents. Timber treatment is considered by definition in the PDP to be a significant hazardous facility. As such, the effects from this facility are present and well understood in the context of the Waipapa Heavy Industrial zone and any setback imposition should be on the adjacent zone, not from the Heavy Industrial zone.
36. Similarly to the recommendation in the s42A Report ROR, where it now recommends a 100m setback for sensitive activities from the Heavy Industrial zone within the Rural Production zone, I believe the same logic should also apply for the establishment of a

significant hazardous facilities in the Heavy Industrial zone. Either a 250m setback should be applied to the adjacent Rural Production zone, or the recommended 100m setback in the Rural Production from the Heavy Industrial zone should apply to ensure that activities provided for within the Heavy Industrial zone can continue relative unencumbered.

37. I note that an additional 150m setback within the Heavy Industrial zone may render much of the site incapable of accommodating a significant hazardous facility as a permitted activity.

FURTHER SUBMISSION FS369.327 – TOP ENERGY

38. The further submission from Top Energy supports in part the WPL submission on **NH-R3** on the grounds that it is overly restrictive for the 1 in 100 year River Flood Hazard areas, and to provide for above ground infrastructure as a permitted activity. Further context is derived from their original submission⁵ where it appears the rationale, in part, is because the infrastructure is not habitable.
39. It is not clear from the Top Energy submission what the relevance of a building or structure being non-habitable is, in the context of why the threshold is applied. However, I note that industrial buildings also are not habitable, and sensitive activities such as dwellings, are non-complying within the Heavy Industrial zone.
40. I still maintain that an arbitrary figure applying consistently across all zones for natural hazards, which are very different in nature, is a blunt tool and the effects of new buildings and structures on the river flood hazard are better addressed at the time of building consent.

FURTHER SUBMISSION FS347.005 BP OIL NEW ZEALAND LIMITED, MOBIL OIL NEW ZEALAND LIMITED AND Z ENERGY LIMITED

41. The further submission from BP Oil New Zealand Limited, Mobil Oil New Zealand Limited and Z Energy Limited supports the WPL submission on **HS-R2** on the grounds that an area which was previously zoned Rural Production, and now zoned Heavy Industrial, should have precedence, and the limits of the Rule should only apply to sensitive activities not within the Heavy Industrial Zone.
42. I maintain that the Heavy Industrial zone is a scarce resource, particularly in the location of Kerikeri and Waipapa when compared to the Rural Production zone. This was acknowledged in the S42A Report ROR - Rural which supported a setback within the Rural Production zone for sensitive activities from the boundary of a Heavy Industrial zone.
43. Sensitive activities that are present in the new Heavy Industrial zone have been established legally, despite no longer being provided for within the Heavy Industrial zone.

⁵ Submission S483 Top Energy

As such they can remain but should not hinder the ability of the newly proposed Heavy Industrial zone to function as intended. Through promoting this zone in the PDP Council have clearly signalled a transition from a Rural Production environment to Heavy Industrial and envisage a transition of activities. Allowing existing sensitive activities in the Heavy Industrial zone to restrict the ability of the zone to function through enforcing a significant setback defeats the purpose of zoning the land Heavy Industrial.

44. I therefore agree with the further submission insofar that the Rule should not apply to sensitive activities within the Heavy Industrial Zone.

FURTHER SUBMISSION FS403.133 TE WHATU ORA – NGA TAI ORA

45. The further submission from Te Whatu Ora – Nga Tai Ora supports in part the WPL submission on **HS-R2** on the grounds that they seek to amend the provisions to require a setback from 'Significant Hazardous Facilities'.
46. Similarly to my commentary above, I maintain that the Heavy Industrial zone is a scarce resource, particularly in the location of Kerikeri and Waipapa when compared to the Rural Production zone. This was acknowledged in the S42A Report ROR – Rural, which supported a setback within the Rural Production zone of sensitive activities from the boundary of a Heavy Industrial zone.

SECTION 42A RECOMMENDATIONS

47. The S42A Report officer's rationale for retaining the thresholds in NH-R2 and NH-R3 appears contradictory. The report writer clearly acknowledges/accepts the thresholds are *"somewhat arbitrary and potentially restrictive"*⁶ but then concludes they are *"appropriate permitted thresholds"*, pointing to a lack of evidence in submissions to identify a more appropriate threshold.
48. Interestingly, the s32 Report prepared for the Natural Hazards chapter also does not provide any analysis of appropriate thresholds, or rationale for 10m² other than to say *"Minor alterations to existing buildings and structures, and small new buildings and structures are permitted activities in a flood hazard zone (and other zones), provided that they are not located in, or alter, an overland flow path. The basis for this is that small structures (as defined in the rules (NH-R2 and R3) located in a flood plain are unlikely to materially increase flood plain height and affect other property"*⁷.
49. The reporting officer's statement that there is a *"lack of clear evidence in submissions for a more appropriate threshold"* also overlooks the fundamental point raised in the WPL submission that it is not an arbitrary threshold that needs to change, more the mechanism (building consent) for assessing detailed design solutions to address effects of river flood hazards.

⁶ S42A Report Natural Hazards: Page 42

⁷ S32 Report Natural Hazards: Page 21

50. The s42A report writer agrees that the new industrial land resource is a vital resource⁸. While I don't necessarily agree that the Heavy Industrial zone should have precedence over another zone, I do believe that the activities within the Heavy Industrial zone should be protected from reverse sensitivity effects and a more pragmatic solution, like that recommended in the Hearing 9 for sensitive activities⁹ should apply.
51. As previously identified, the existing use rights applying to the WPL land exist for what is defined as a significant hazardous facility. There is also an abundance of Rural Production land on the periphery of the site that can more easily accommodate a setback or buffer. A 250m buffer for the Heavy Industrial zone (a much scarcer resource than Rural Production land) would appear to be a more pragmatic solution should the imposition of a 250m buffer be applied to address any potential effects of a significant hazardous facility.

RECOMMENDED CHANGES

52. Within Waipapa the extent of the river flood hazard in the Heavy Industrial zone is insignificant, and is generally impervious (refer Figure 1 above). I consider that there is no need for an arbitrary figure in the Heavy Industrial zone, where there is already a predominance of impervious surface. Noting that NH-R3 still applies, ensuring the building or structure is not located within or does not alter or divert an overland flow path. The amendments are shown in ~~strike through~~ and underline.

NH-R3	New buildings or structures	
River Flood Hazard areas	<p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p>The building or structure is one of the following:</p> <ol style="list-style-type: none"> 1. above ground buildings or structures with a GFA or footprint of 10m² or less; or 2. deck less than 30m² and less than 1m in height; or 3. boardwalks or stairs that are less than 500mm above ground level and located within a public reserve or legal road. <p>PER-2</p>	<p>Activity status where compliance with PER-1 or PER-2 is not achieved: Restricted Discretionary (refer Rule NH-R7 for new buildings and Rule NH-R9 for new structures other than buildings)</p>

⁸ S42A Report Hazardous Substances: paragraph 111

⁹ Refer paragraphs 19-22 in this Hearing Statement

	<p>The building or structure is not located within or does not alter or divert an overland flow path.</p> <p><u>Note: NH-R3 PER-1 does not apply to land within the Heavy Industrial zone.</u></p>	
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53. Given the context of the zoned environment in the Waipapa area, and the commentary earlier in my evidence, I consider the most pragmatic solution is to remove the imposition on the Heavy Industrial zone to setback new significant hazardous facilities.

54. I believe there are two ways of addressing the relief sought:

OPTION 1 - HS-R2 PER 2 is removed and the recommended 100m setback from the Heavy Industrial zone in the Rural Production zone, supported in the ROR Hearing 9, is relied on to address any concerns on establishment of a new significant hazardous facility. Noting that a 100m setback in the Rural Production zone has been deemed suitable for the Heavy Industrial zone and the Mineral Extraction overlay. Existing lawfully established significant hazardous facilities and sensitive activities in the Heavy Industrial zone remain.

HS-R2	Establishment of a new significant hazardous facility	
Heavy Industrial zone	<p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p>The new significant hazardous facility is not located within a sensitive environment;</p> <p>PER-2</p> <p>The new significant hazardous facility is setback at least 250m from a sensitive activity.</p> <p>Note:</p> <ul style="list-style-type: none"> This rule only has immediate legal effect for a new significant hazardous facility located within a scheduled site and area of significance to Māori, significant natural area or a scheduled heritage resource. 	<p>Activity status where compliance not achieved with PER-1 or PER-2: Discretionary</p>

OPTION 2 - HS-R2 PER 2 is removed and the 250m setback is applied on the adjacent Rural Production zone. This involves amending the recommendation in the Hearing 9 ROR for the Rural Production zone.

55. Consequential amendments within the Rural Production zone will also be required referencing the recommended new standard.

HS-R2	Establishment of a new significant hazardous facility	
Heavy Industrial zone	<p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p>The new significant hazardous facility is not located within a sensitive environment;</p> <p>PER-2</p> <p>The new significant hazardous facility is setback at least 250m from a sensitive activity.</p> <p>Note:</p> <ul style="list-style-type: none"> • This rule only has immediate legal effect for a new significant hazardous facility located within a scheduled site and area of significance to Māori, significant natural area or a scheduled heritage resource. 	Activity status where compliance not achieved with PER-1 or PER-2: Discretionary
RPROZ-SZ	Sensitive activities set back from the boundaries of the Heavy Industrial Zone	
Rural Production zone	Sensitive activities (excluding non-habitable accessory buildings) must be setback at least 250m from the boundary of the Heavy Industrial zone.	<p>Where the standard is not met, matters of discretion are restricted to:</p> <ol style="list-style-type: none"> Potential reverse sensitivity effects and measures taken to mitigate these effects, such as landscaping or screening Whether there are alternative options for the location of the sensitive activity

SECTION 32AA EVALUATION

Effectiveness and Efficiency

56. Protecting activities enabled and provided for within the Heavy Industrial zone from sensitive activities establishing on surrounding zones is an effective and efficient method in achieving the purpose of the RMA.
57. River flood hazards insignificantly affect the Heavy Industrial landholding in Waipapa, and the landholdings affected are for the most part impervious. The risk can more efficiently and effectively be managed through building consent which will focus on the performance of the building or structure in a flood event, the size of the building or structure itself may be irrelevant, noting PER-2 of Rule of NH-R3 still applies where the building or structure is not located within or does not alter or divert an overland flow path.

Costs/Benefits

58. The economic and social benefits of appropriately providing for Heavy Industrial zones are significant given the contribution they make to the districts economy and their need to be located away from sensitive activities. The Heavy Industrial zone coverage across the PDP is limited to certain areas and contains stronger provisions to ensure activities locate in the correct zone. This places more onus on ensuring that the zone is not potentially sterilised.
59. The PDP zones Heavy Industrial land to accommodate activities that are likely to have significant effects. Activities within the Heavy Industrial zone need to continue relatively unencumbered while ensuring that effects on surrounding zones are considered.
60. Requiring resource consent for potential flooding effects based on arbitrary figures, not based on a catchment or site analysis places an unwarranted burden on a land owner.
61. Compliance issues/complaints associated with the activities enabled and provided for in the Heavy Industrial zone may increase, which can affect the only area of Heavy Industrial zoned land in Kerikeri / Waipapa.

Risk of Acting or not Acting

62. The risk of not acting is that there is the potential for a loss in the benefits provided by the Heavy Industrial zone. If the zone is restricted by sensitive activities established within the zone and being established in surrounding zones then it will not be able to function as intended and could be potentially sterilised.
63. True heavy industrial activities may not locate here and instead seek other landholdings (i.e the Rural Production zone). This would be inconsistent with the direction set by the PDP.

64. New development within the Heavy Industrial zone may be hampered by unnecessary costs and delays that may ordinarily be addressed through design and the building consent. This imposes unnecessary costs and delays on applicants and places an avoidable administrative burden on the Council.

CONCLUSION

65. I am of the opinion that the Rural Production zone needs to make provision for neighbouring Heavy Industrial zones to protect the activities being undertaken in the Heavy Industrial zone from reverse sensitivity effects.
66. I am also of the opinion that the Building Act can appropriately address effects from any new buildings or structures in a mapped river flood hazard.
67. A standard has been applied in the Rural Production zone requiring sensitive activities to be setback from the Mineral Extraction zone. Further, the s42A ROR has recommended the same standard be applied to sensitive activities within the Rural Production zone to be set back from the Heavy Industrial zone. I consider that this current arrangement suffices as an option to address the relief sought, or if a 250m setback is still deemed necessary, then the burden of setback is placed on the adjacent Rural Production zone.
68. There is a limited quantum of Heavy Industrial zoned land proposed in the PDP in the vicinity of Kerikeri and Waipapa (and across the Far North District). The introduction of the Heavy Industrial zone within the PDP signals where Council wants activities that may produce offensive and objectionable environmental effects to locate. As such, it is important for activities supported in the Heavy Industrial zone to remain unencumbered and not sterilised by surrounding sensitive activities, which do not need to be placed in proximity to the Heavy Industrial zone.

Attachment 1 - Representation Transfer

4 September 2023

Far North District Council

5 Memorial Avenue

Private Bag 752

Kaikohe 0440

Re: Waipapa Pine Limited and Adrian Broughton Trust Submission No 342"

Waipapa Pine Ltd entered into a sale and purchased agreement with Fletcher Building Ltd, for the sale of 100% of Waipapa Pine Ltd shares to Fletcher Building Ltd. The sales transaction, and share transfer, was completed on the 9th of June 2023

This letter serves to notify FNDC that the previous Directors of Waipapa Pine Ltd are transferring representation rights to Fletcher Building Ltd, with regards to submission No 342

A handwritten signature in black ink, appearing to read 'Grant Arnold'.

Grant Arnold

Previous Director

Waipapa Pine Ltd

4 September 2023

Far North District Council

5 Memorial Avenue

Private Bag 752

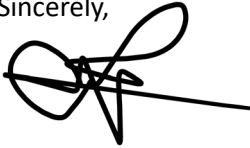
Kaikohe 0440

Re: Waipapa Pine Limited and Adrian Broughton Trust Submission No 342"

The Adrian Broughton Trust entered into a sale and purchase agreement with Fletcher Building Ltd for the sale of land & buildings related to submission No 342. The purchase was completed on the 9th of June 2023.

This letter serves to notify FNDC that the trustees of The Adrian Broughton Trust are transferring representation rights to Fletcher Building Ltd, with regards to submission No 342

Yours Sincerely,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Adrian Broughton

The Adrian Broughton Trust