



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:	FNR Properties Limited		
Company / Organisation Name: (if applicable)			
Contact person (if different):	Nina Pivac (Tohu Consulting Limited)		
Full Postal Address:	39A Commerce Street, Kaitaia 0410		
Phone contact:	Mobile:	Home:	Work:
	0210614725		
Email (please print):	nina@tohuconsulting.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

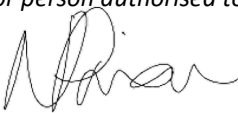
Note: if you are a person who could gain advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

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)

See attached full submission.



Confirm your position: <input type="checkbox"/> Support <input type="checkbox"/> Support In-part <input type="checkbox"/> Oppose (please tick relevant box)
My submission is: (Include details and reasons for your position) See attached full submission.
I seek the following decision from the Council: (Give precise details. If seeking amendments, how would you like to see the provision amended?) See attached full submission.
<input checked="" type="checkbox"/> I wish to be heard in support of my submission <input type="checkbox"/> I do not wish to be heard in support of my submission (Please tick relevant box)
If others make a similar submission, I will consider presenting a joint case with them at a hearing <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Do you wish to present your submission via Microsoft Teams? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Signature of submitter: (or person authorised to sign on behalf of submitter)  Date: 21 October 2022 (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

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 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

Submission on the Far North Proposed District Plan

Full name: FNR Properties Limited
c/o Tohu Consulting Limited
Attn: Nina Pivac

Postal Address: 39A Commerce Street, Kaitaia 0410

Mobile: +64 21 061 4725

Email: nina@tohuconsulting.nz

FNR Properties Limited could not gain an advantage in trade competition through this submission.

The specific provisions of the Plan Change that FNR Properties Limited's submission relate to are set out in the attached document.

FNR Properties Limited oppose the proposed plan change subject to amendments as listed in the attached document. The reasons for FNR Properties Limited's submission are provided in the attached document.

The relief sought by FNR Properties Limited are contained in the attached document.

FNR Properties Limited **wish to be heard** in support of its submission.

If others make a similar submission, FNR Properties Limited will consider presenting a joint case with them at a hearing.

Ngā Mihi,



Agent:
Tohu Consulting Limited
Nina Pivac
Planner/Director

Date: 21 October 2022

1.0 INTRODUCTION AND GENERAL FEEDBACK

FNR Properties Limited (FNR Properties) are the asset management arm of FNR Group Limited, the latter of whom have provided a variety of civil and construction services to the Far North District for over 10 years. Since its establishment, FNR Properties have been involved in many regionally significant development projects, making a positive contribution to the social and economic growth of the Far North District.

FNR Properties have an interest in multiple properties in the Far North District, including two properties located on State Highway 1 (SH1), Awanui, legally described as Lot 2 DP 547587 (CT. 935187) and Lot 3 DP 547587 (CT. 935188). These properties are referred to hereon as the subject site.

The subject site is located in an area largely characterised by residential development. There are properties in the immediate vicinity that are also used for non-residential activities including the Awanui Refuse Transfer Station, Awanui RFC and Sports Complex, Awanui Primary School, Durapanel, and other industrial and commercial activities.

The subject site is currently vacant and used for production purposes. However, it is considered that the site has the potential to accommodate a variety of activities in a manner that is consistent with existing development patterns in the immediate vicinity.

FNR Properties acknowledge and appreciate the work that Far North District Council (FNDC) have put in to developing the Far North Proposed District Plan (PDP).

The subject site is currently zoned Rural Production (RPZ) under the ODP, and the PDP proposes to retain the RPZ zoning of the site. In general, FNR Properties oppose the proposed zoning of the subject site subject to amendments. Specific submission points have been outlined in **Section 2.0** below, including the relief sought to improve the PDP.



Figure 1: Map showing proposed zoning of subject site (Far North PDP Maps)

2.0 FEEDBACK ON FAR NORTH PROPOSED DISTRICT PLAN

Feedback Point	Feedback Topic	Support/Oppose/Seek Amendment/Clarification	Comments/Reasons	Relief Sought
1	Rural Production Zone (RPZ) – Zoning	Oppose/Seek Amendment	<p>It is noted that the PDP proposes to retain the RPZ zoning of the subject site which FNR Properties strongly opposes.</p> <p>As notified in the PDP, it is noted that the proposed thresholds for residential intensity and subdivision are significantly reduced which will severely restrict development opportunities in an area where expansion should be accommodated.</p> <p>As noted in Section 1.0 above, the subject site is located in an area that is largely characterised by residential development. In addition, there are properties in the immediate vicinity that are used for non-residential activities including the Awanui Refuse Transfer Station, Awanui RFC and Sports Complex, Awanui Primary School, Durapanel, and other industrial and commercial activities.</p> <p>It is considered that rezoning the site to General Residential (GRZ) would</p>	To rezone the subject site, or at least rezone the eastern half of the subject site, to GRZ.

S319.001

Feedback Point	Feedback Topic	Support/Oppose/ Seek Amendment/Clarification	Comments/Reasons	Relief Sought
			<p>be more appropriate as this would recognise the immediate need for more housing in the district and in turn assist in alleviating the current housing crisis that is being observed both locally and nationwide.</p> <p>Further, rezoning the site to GRZ is considered appropriate in this instance given the site adjoins the GRZ to the north and east, and will therefore allow for a continuation of existing residential development patterns.</p>	
2	RPROZ-R3 Residential Activity	Oppose/Seek Amendment	<p>FNR Properties do not support the RPZ provisions relating to residential intensity.</p> <p>As notified in the PDP, it is noted that the permitted threshold for residential intensity will be reduced from one residential unit per 12ha to one residential unit per 40ha. Further, the total number of residential units on one site in the RPZ shall not exceed six.</p>	To 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.

S319.002

Feedback Point	Feedback Topic	Support/Oppose/ Seek Amendment/Clarification	Comments/Reasons	Relief Sought
			<p>It is also noted that 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.</p> <p>Overall, it is considered that 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 socio-economic wellbeing of the Far North District. Reasons are as follows:</p> <p>It is noted that the majority of the Far North District is proposed to be zoned RPZ which 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.</p>	

Feedback Point	Feedback Topic	Support/Oppose/ Seek Amendment/Clarification	Comments/Reasons	Relief Sought
			<p>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 (e.g. due to factors such as topography, soil type and productivity, the preservation of indigenous flora and habitats of fauna, and emerging development patterns in the immediate vicinity).</p> <p>Whilst it is acknowledged that the Far North District largely identifies by its rural character and amenity, the PDP also needs to recognise that housing developments can occur in a manner that will not adversely affect rural amenity and character to a 'more than minor' degree. 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</p>	

Feedback Point	Feedback Topic	Support/Oppose/ Seek Amendment/Clarification	Comments/Reasons	Relief Sought
			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).	
3	Subdivision Chapter – SUB-S1 Minimum Allotment Sizes Rural Production	Oppose/Seek Amendment	FNR Properties do not support the RPZ provisions relating to minimum allotment size for the same reasons outlined above.	To 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.

S319.003