



FS23



Proposed Far North District Plan further submission form

Form 6: Further submission in support of, or in opposition to, submission(s) on the notified Proposed Far North District Plan

Clause 8 of Schedule 1, Resource Management Act 1991

To: Far North District Council

This is a further submission in support of or in opposition to submission(s) on the Proposed Far North District Plan.

1. Further submitter details (mandatory information)	
Full name of individual/organisation making further submission:	Des & Lorraine Morrison
Contact person (if different from above):	Vicki Morrison-Shaw
Email address:	vicki@morrisonshaw.nz des.lorraine@xtra.co.nz
Postal address:	P O Box 159 Matakana Postcode 0948
Preferred method of contact:	<input checked="" type="checkbox"/> Email <input type="checkbox"/> Post
Phone contact:	Daytime: 0275 720 883 Mobile: 0275 720 883

2. Eligibility to make a further submission (for information on this section go to RMA Schedule 1, clause 8)

I am:

- A person representing a relevant aspect of the public interest. In this case, also specify below the grounds for saying that you come within this category; or
- A person who has an interest in the proposal greater than the interest that the general public has. In this case, also specify below the grounds for saying that you come within this category; or
- the local authority

My reasons for selecting the category ticked above are:

I am a person who has an interest in the proposal greater than the general public as:

- (a) I own the property located at 19 James Street, Russell/Kororāreka;
- (b) I made an original submission on this plan change (submission #44);
- (c) My property is affected by the zoning, overlays and provisions of the proposed district plan.

For example: Any person representing a relevant aspect of the public interest would likely include public interest environmental groups

Any person that has an interest in the proposed policy statement or plan greater than the interest that the general public has is likely to include owners of land and users of resources directly affected by plan provisions. It is also likely to include iwi and hapu where their interests are directly affected.

3. Request to be heard at hearing

- Yes, I wish to be heard at the hearing in support of my further submission; or
- No, I do not wish to be heard at the hearing in support of my further submission

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

- Yes No

Signature of further submitter:

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



Date: 31 August 2023

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

Important information:

1. A copy of your further submission must be served on the original submitter within five working days after it is served on Far North District Council.
2. The Far North District Council must receive this further submission before the closing date and time for further submissions (**5pm Monday, 4 September 2023**)
3. Please note that further submissions, including your name and contact details are treated as public documents and will be made available on council's website. Your further submission will only be used for the purpose of the District Plan review.
4. 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 further submission form). If you don't have an email address, it will be posted.

Please note that your further 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 further 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 further 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.

Send your further submission to:

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

Email to: pdp@fndc.govt.nz

Or you can also deliver this further submission form to any Far North District Council service centre or library (check the Council website for opening hours).

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.

The specific submission(s) on the Proposed Far North District Plan that this further submission relates to:						
Name of original submitter	Address of original submitter	Original submitter number	Original submission point number	Support or oppose	Reasons for supporting or opposing	Relief sought
Lynley Newport	59 Cook Road, Okaihau	132	132.001 Amend KRTZ-P2 to allow alternatives to public wastewater connection	Support	<p>Would enable alternatives to be provided on-site where the site is large enough to address wastewater.</p> <p>This is important in the Russell context where there is limited availability to connect to the public waste-water system and requiring a connection would therefore constrain development.</p>	<p>I seek that the submission point be allowed in full.</p> <p>FS23.001</p>
Lynley Newport	59 Cook Road, Okaihau	133	133.001 Make provision for minor residential unit in the Kororāreka township zone (KTA-R8)	Support	<p>Enables intergenerational living on one site, which allows different types of households to provide for their wellbeing.</p> <p>Increases affordability of housing options for families.</p> <p>Also provides an option for rental income if it is not required to accommodate family.</p>	<p>I seek that the submission point be allowed subject to the submissions made below re the size (65m²).</p> <p>FS23.002</p>
Russell Protection Society	PO Box 154 Russell 0242	179	179.001 – 179.010	<p>Support in part</p> <p>Oppose in part</p>	<p>Generally, support the objective and policy framework suggested as it will provide clear guidance to plan users and the regulator as to what is anticipated/desired for the township zone.</p> <p>However, the reference to encouraging the retention of existing vegetation is too broad as it does not distinguish between indigenous and non-indigenous vegetation, nor the quality or significance of that vegetation.</p>	<p>Allow relief sought but clarify type of vegetation sought to be protected.</p> <p>FS23.003-.012</p>

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Russell Protection Society	P O Box 154 Russell 0242	179	179.011 – Policy KRT-P6 historical viewshaft	Support	Viewshafts are important to retain a connection within and between places.	Allow relief sought. FS23.013
Russell Protection Society	P O Box 154 Russell 0242	179	179.012 – KRT- R2 impermeable surfaces	Support	It is important to appropriately control impermeable surface coverage to avoid adverse impacts arising from stormwater.	Allow relief sought. FS23.014
Russell Protection Society	P O Box 154 Russell 0242	179	179.013 – KRT- R3 residential intensity	Support	The relief sought would provide a useful clarification of the site size anticipated for restricted activity consents.	Allow relief sought. FS23.015
Russell Protection Society	P O Box 154 Russell 0242	179	179.014-017 – KRT- R4-R7 Provisions for residential accommodation, home business, educational facility and home residential care	Support in part	It is important to make provisions for these types of activity within the zone. Support provisions, subject to the clarification being made to the visitor accommodation provision suggested by Air BnB below.	Allow relief sought FS23.016- FS23.0398-400
Russell Protection Society	P O Box 154 Russell 0242	179	179.018 – Policy KRT-R8 minor residential unit	Support in part Oppose in part	It is important to provide minor residential units to enable intergenerational living so provision for such units is supported. However, 45m ² is too small to accommodate more than one person. Provision for up to 65m ² is more appropriate and aligns with provision made in the Auckland Unitary Plan.	Allow relief sought in terms of providing for minor residential units but increase the size to up to 65m ² . FS23.017
Russell Protection Society	P O Box 154 Russell 0242	179	179.019-030 other standards	Support	It is important to provide standards to guide the layout and anticipated development on the site. Standards generally appear appropriate.	Allow relief sought. FS23.018-.029

Name of original submitter	Address of original submitter	Original submitter number	Original submission point number	Support or oppose	Reasons for supporting or opposing	Relief sought
Russell Protection Society	P O Box 154 Russell 0242	179	179.068-079 overlays	Support in part	Support to the extent consistent with our primary submission. Agree consideration needs to be given to how such overlays apply or are integrated into urban zones.	Allow relief sought to the extent relief sought is consistent with our primary submission. FS23.030-.042
Russell Protection Society	P O Box 154 Russell 0242	179	179.086-089 open spaces	Support	Preservation of sightlines is important to retain the character of Kororāreka and the connection between significant places onshore and offshore.	Allow relief sought. FS23.043-.046
Russell Protection Society	P O Box 154 Russell 0242	179	179.090-106 subdivision	Support in part	Agree it is important to ensure effects of subdivision, including cumulative effects, are appropriately considered during consenting processes. Also agree with the lot sizes proposed for Kororāreka zone, and the other zones to the extent this is consistent with our primary submission.	Allow relief sought to the extent relief sought is consistent with our primary submission. FS23.047-.062
Airbnb – Dylan Schwartz	Level 4/160 Reservoir Street, Surrey Hills NSW 2010	214	214.001-015 visitor accommodation	Support	Support standardizing the number applying to permitted visitor accommodation activities across all zones. Taking a consistent approach will make it easier for the plan provisions to be applied and understood. The effects are not likely to differ significantly in residential zones.	Allow relief sought. FS23.063-.077
Russell Landcare Trust	Hazard Street, Russell 0272	276	276.002 – Sub R6 - Environmental benefit subdivision	Support in part Oppose in part	Support need for clear rules regarding environmental benefit subdivision. Consider a more nuanced approach is required as it may not be possible to protect the entirety of each ecological feature, and site-specific characteristics of a site should be able to be considered.	Allow in part but clarify rules. FS23.078

Name of original submitter	Address of original submitter	Original submitter number	Original submission point number	Support or oppose	Reasons for supporting or opposing	Relief sought
Russell Landcare Trust	Hazard Street, Russell 0272	276	276.004–276.008 Ecosystems and indigenous biodiversity	Oppose	<p>While it is accepted that there should be controls within the plan to appropriately provide for and manage effects on ecosystems and biodiversity, the provisions proposed by the submitter appear to go too far and would constrain a reasonable use being made of land.</p> <p>There is a need to balance reasonable use and protection, particularly where enabling some development would better assist with protecting the balance of the land.</p> <p>The notified rules of the proposed plan better provide for these matters than those sought by the submitter.</p>	Disallow relief sought. FS23.079-.083
Russell Landcare Trust	Hazard Street, Russell 0272	276	276.011–276.019 Summary of key points	Oppose in part	<p>While it is accepted that there should be controls within the plan to appropriately provide for and manage effects on ecosystems and biodiversity, and that changes should be made to ensure that the provisions give effect to the higher order policy documents, the provisions proposed by the submitter appear to go too far and would constrain a reasonable use being made of land.</p> <p>It is also noted that further changes may be required to give effect to the NPSIB.</p>	Disallow relief sought to the extent it goes beyond what is required by the higher order plan and policy documents. FS23.084-.092 missing 276.019
Colwyn Shortland	34 Pukematu Lane Russell 0202	315	315.001 Zoning of properties	Support	<p>Submission seeks the same outcome as our primary submission.</p> <p>Rezoning to Kororāreka township zone is more appropriate for the reasons set out in our primary submission.</p>	Allow rezoning of the land. FS23.093

Name of original submitter	Address of original submitter	Original submitter number	Original submission point number	Support or oppose	Reasons for supporting or opposing	Relief sought
Northland Regional Council	Private Bag 9021 Te Mai Whangārei 0143	359	359.004 National direction	Support	District plans are required to give effect to higher order policy and plan instruments. It is appropriate that the provisions of the district plan be revised to the extent necessary to ensure these documents are given effect to.	Allow the relief sought by making changes necessary to give effect to higher order documents. FS23.094
Northland Regional Council	Private Bag 9021 Te Mai Whangārei 0143	359	359.005-009 Climate change	Support	With the introduction of the Climate Change and National Adaption Plans last year it is appropriate to include provisions relating to climate change, and to ensure other provisions take into account climate change to the extent relevant.	Allow the relief sought by making changes to make appropriate provision for climate change. FS23.095-.099
Northland Regional Council	Private Bag 9021 Te Mai Whangārei 0143	359	359.012 Water resilience	Support	It is important, particularly in places like Kororāreka that do not have a public supply, that new development incorporates low impact design, and requires the use of water tanks on site rather than taking unnecessarily from ground or surface water supplies.	Allow the relief sought . FS23.100
Northland Regional Council	Private Bag 9021 Te Mai Whangārei 0143	359	359.014 - 3 Waters infrastructure	Oppose in part	While recognizing that it is important that each lot has access to 3 waters infrastructure, where this is not able to be provided by the Council, provision should be able to be made for this to occur on-site. This could be required to be done in such a way that it does not foreclose joining public connections in the future. Restricting development to only where public infrastructure is available would unnecessarily constrain the ability to provide much needed housing.	Disallow the relief sought to the extent it seeks to not permit onsite provision for 3 waters infrastructure. FS23.101

Name of original submitter	Address of original submitter	Original submitter number	Original submission point number	Support or oppose	Reasons for supporting or opposing	Relief sought
Northland Regional Council	Private Bag 9021 Te Mai Whangārei 0143	359	359.023-025 Māori land	Support	It is important that specific provision is made for Māori land and that these provisions do not inappropriately constrain the use to be made of this land – given the need to provide for positive economic usage by Māori not just preservation and conservation.	Allow the relief and make changes to ensure that economic relief can continue to be made of Māori land FS23.102-104
Northland Regional Council	Private Bag 9021 Te Mai Whangārei 0143	359	359.026 Environmental benefit subdivision	Support in part Oppose in part	It is appropriate to enable such subdivision where it would assist in addressing issues associated with erosion prone land. However, consideration should be given to allowing such subdivision for smaller blocks of land – 4 ha is too large in this context, 1ha is more appropriate.	Allow the relief to add erosion prone land but reduce required site size to 1 ha. FS23.105
Northland Regional Council	Private Bag 9021 Te Mai Whangārei 0143	359	359.035-036 Historical and cultural values	Support	It is important to ensure that provision is made for sites of significance to Māori and to appropriately resource Māori to participate in RMA processes.	Allow the relief sought. FS23.106-107
Far North District Council	Private Bag 752, Memorial Ave, Kaikohe 0440	368	368.084 earthworks	Support	It is appropriate to exclude earthworks relating to infrastructure and driveway formation from this rule as these matters are incidental to development occurring on a site, are generally small in scale, and are necessary to provide access to and/or service that development. Effects arising from these types of activities can be appropriately controlled by permitted activity standards.	Allow the relief sought. FS23.108

Name of original submitter	Address of original submitter	Original submitter number	Original submission point number	Support or oppose	Reasons for supporting or opposing	Relief sought
John Andrew Riddell	36 Matauwhi Road Russell 0202	431	431.004, 006, 008, 010-021	Oppose	<p>It is inappropriate to:</p> <ul style="list-style-type: none"> - require compliance with design guidelines in the plan, given it would stymie the ability to adopt future best practice methods. - require avoidance of effects on all indigenous biodiversity rather than just significant indigenous biodiversity as per the higher order policy documents. - constrain development to areas that are able to be serviced by infrastructure, given the constraints in Kororāreka in connecting to public services. The opportunity should remain to allow onsite servicing. 	<p>Disallow the relief sought.</p> <p style="color: red;">FS23.109-123</p>
John Andrew Riddell	36 Matauwhi Road Russell 0202	431	431.086 Subdivision environmental benefit	Oppose	<p>While supporting provision being made for environmental benefit subdivision, it is inappropriate to require blanket protection of the entirety of an ecological feature, and to impose 20m setbacks, without having regard to the particular site size and characteristics. A more nuanced approach is required.</p>	<p>Disallow the relief sought.</p> <p style="color: red;">FS23.124</p>
John Andrew Riddell	36 Matauwhi Road Russell 0202	431	431.087 Average lot size	Oppose	<p>It is inappropriate to mandate average lot sizes of 6 ha in the RPZ and 2 ha in the RLZ. This would foreclose the opportunity for the protection and reasonable use of smaller sites within these zones. The notified plan lot size within the RPZ of 4 ha is more appropriate. In terms of the RLZ, 1 ha would better reflect the quasi-residential use, and proximity of that type of land to urban areas.</p>	<p>Disallow the relief sought.</p> <p style="color: red;">FS23.125</p>

Name of original submitter	Address of original submitter	Original submitter number	Original submission point number	Support or oppose	Reasons for supporting or opposing	Relief sought
John Andrew Riddell	36 Matauwhi Road Russell 0202	431	431.090-108 Ecosystems and indigenous biodiversity	Oppose in part	Oppose to the extent the relief goes beyond what is required to give effect to the higher order policy documents. There is no need to repeat those provisions within the District Plan. Some of the changes sought would unnecessarily and inappropriately restrict s reasonable use being able to be made of land.	Disallow the relief sought. FS23.126-144
John Andrew Riddell	36 Matauwhi Road Russell 0202	431	431.147-148	Oppose	The suggested amendments would be difficult to demonstrate compliance with given, the infrastructure is at the discretion of the Council. It is unclear what "certainty" means in this context.	Disallow the relief sought. FS23.145-146
House movers' section of the Heavy Haulage Association	C/o Stuart Ryan Level 11 59 High Street Auckland	482	482.001-021 Relocated buildings	Support	It is important that provision is made in all zones for relocatable buildings to enable choice, reuse of existing housing, and to make it clear what the activity status is for such buildings. This is particularly the case in urban zones.	Allow the relief sought. FS23.147-168
Te Rūnanga o Ngāpuhi	P O Box 263 Kaikohe 0440	498	498.001-085	Support to extent consistent with primary submission	It is important that provisions are consistent with Treaty principles and recognise and provide for Māori interests, including (but not limited to) appropriate economic development of their land.	Allow the relief sought to the extent consistent with our primary submission. FS23.169-253
Forest & Bird	P O Box 631 Wellington 6011	511	511.061 – policy primary production	Oppose in part	The changes to the policy suggested by Forest and Bird go beyond those necessary to appropriately address the SNA and would result in a landowner not being able to make reasonable use of their property.	Retain the notified wording or similar. FS23.254

Name of original submitter	Address of original submitter	Original submitter number	Original submission point number	Support or oppose	Reasons for supporting or opposing	Relief sought
Forest & Bird	P O Box 631 Wellington 6011	511	511.064 – management of pest species	Support	Agree for the reasons set out in the submission that the provision should not apply to all landowners.	Make changes to give effect to the relief sought. FS23.255
Forest & Bird	P O Box 631 Wellington 6011	511	511.067 – felling of trees	Oppose	Disagree that trees felled within SNA should always be left in-situ, as this unreasonably constrains use being made of the felled trees for firewood or for other reuse or cultural purposes.	Disallow the relief to the extent it requires all felled trees to be retained in situ. FS23.256
Forest & Bird	P O Box 631 Wellington 6011	511	511.068 – clearance	Oppose in part	Disagree that the extent of clearance and frequency of clearance should be reduced to the extent sought in the submission. While agreeing that 100m ² every year, may not be appropriate, retaining 100m ² but limited to every 2 or 3 years may be more appropriate.	Disallow relief sought, retain 100m ² , but reduce frequency. FS23.257
Forest & Bird	P O Box 631 Wellington 6011	511	511.086-087 – scheduled SNAs	Oppose	There has been no ground truthing of SNAs or the extent of them. The relief would impose restrictions that may not be justified when the characteristics of the particular site are considered.	Disallow the relief sought. FS23.258-259
Te Rūnanga o Ngāti Rēhia	P O Box 202 Kerikeri 0245	559	559-014-026 SNAs and natural environment values	Support	It is important that a balance of use and protection is enabled on Māori land.	Allow the relief sought. FS23.260-23.272
Kāinga Ora	P O Box 2628 Wellington 6140	561	561.001-124	Support to extent consistent with our primary submission	Generally support for the reasons set out in the submission of Kāinga Ora. It is important that peoples' wellbeing, and in particular their ability to establish housing on their land is enabled. Also particularly support the changes proposed for recognition of and development on Māori land.	Allow the relief sought to the extent consistent with our primary submission FS23.273-39 7