

From: ipal9718@bigpond.net.au
To: [Proposed District Plan](#)
Subject: RE: PDP Submission_ site versus allotment
Date: Friday, 21 October 2022 4:18:56 pm
Attachments: [PDP Submission_ Allotment Versus Sites.docx](#)

CAUTION: This email originated from outside Far North District Council.

Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi,
See attached.

My printer has stopped working (which perhaps is trying to tell me something!) and hence I couldn't print this one and tick the relevant boxes then scan the signed doc and send as a pdf, so please assume the boxes are ticked as per my last submission.

Please confirm receipt and that the above is satisfactory.

(Not this is the 5th, and last submission I'm emailing to you).

**Ngā mihi,
Ian Palmer
021 024 77 985**



*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:	Ian Diarmid Palmer		
Company / Organisation Name: (if applicable)			
Contact person (if different):			
Full Postal Address:	PO Box 273 , Mangonui 0442		
Phone contact:	Mobile:	Home:	Work:
	02102477985		
Email (please print):	ipal9718@bigpond.net.au		

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)

The definition of ‘allotment’ (aka ‘lot’) and ‘site’ and how those terms are used in the PDP.



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

My submission is:

(Include details and reasons for your position)

The term 'site' is used approximately 1200 times in the text of the PDP including in relation to rules prescribing, for example how many residential units are allowed on a 'site' and the area required to be allocated on a 'site' for each residential unit.

However, the standard related to the minimum size of parcels of land (SUB-S1) is titled "Minimum **allotment** sizes" [emphasis added]. The term 'allotment' appears only 85 times in the PDP text.

Given a 'site' (by the definition used) may be comprised of multiple 'titles' (as defined) and a 'title' may be comprised of multiple 'allotments' (as defined) the use of the word 'allotment' in SUB-S1 creates ambiguity and possibly unintended consequences. For example, a subdivision may be proposed of a 8 hectare 'site' into two 4 hectares 'sites' in seeming compliance with SUB-S1 for Rural Lifestyle Controlled subdivision. However, one of the two newly proposed 4 hectare 'sites' may evenly straddle a legal Road (e.g. an unformed Paper Road). LINZ will insist that the new title for this second new 'site' be comprised of two 'allotments' (of 2 hectares each) which will be drawn as such on the Land Transfer and subsequent Deposited Plan. This however could be seen as not then meeting the 4 hectare threshold per SUB-S1.

I seek the following decision from the Council:

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

Change the word 'allotment' as used in SUB-S1 to 'site' and/or otherwise clarify that the areas listed in SUB-S1 are intended to be measures of 'site' areas. (alternatively many of places in the PDP where the word 'site' is used need to be changed to use the word 'allotment').

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- I **wish** to be heard in support of my submission
 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 type="checkbox"/> Yes <input type="checkbox"/> No
Do you wish to present your submission via Microsoft Teams? <input type="checkbox"/> Yes <input type="checkbox"/> No
Signature of submitter: <i>(or person authorised to sign on behalf of submitter)</i> Date: <i>(A signature is not required if you are making your submission by electronic means)</i>

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

556