



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)

SUB-S1 – Minimum Lot Sizes

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



My submission is:

(Include details and reasons for your position)

I am generally not opposed to removing restricted discretionary minimum lot size provisions, EXCEPT for the Rural Production and Horticultural Zones. This zoning has been applied to large portions of the district. The rural nature of the district and the fact that rural and horticultural production accounts a large chunk of the district's economic activity and forms a major part of the district's community, suggests that Council should be spending more time and effort listening to that rural community.

The Council has imposed punitive and restrictive rules to the zones, apparently regardless of a property's productive capacity or existing lot sizes and land use patterns, seemingly not caring that such restrictions are likely to render many marginal productive units uneconomic to continue productive use on because of an inability for the property owner to diversify or reduce debt burden. Where a zone covers such a wide area, and exhibits such a wide range of physical characteristics and lot sizes, a one size fits all approach is not supportable or sustainable for the rural community.

The objective is to protect agricultural and horticultural production capabilities, as per Objective SUB-04.

SUB-04 Subdivision provides for the:

- a. *Protection of highly productive land;*

Where "highly productive land" is defined as:

land that is, or has the potential to be, highly productive for farming activities. It includes versatile soils and Land Use Capability Class 4 land and other Land Use Capability classes Land Use Capability, or has the potential to be, highly productive having regard to:

- a. *Soil type;*
- b. *Physical characteristics;*
- c. *Climate conditions; and*
- d. *Water availability.*

Additionally for the Rural Production Zone:

SUB-P8 Avoid rural lifestyle subdivision in the Rural Production zone unless the subdivision:

- b. *will not result in the loss of versatile soils for primary production activities.*

In the PDP, "versatile soils" are defined as:

soils that are Land Use Capability Classes 1c1, 2e1, 2w1, 2w2, 2s1, 3e1, 3e5, 3s1,3s2, 3s4

There are large areas in the rural and horticultural localities where the existing properties are not economic productive units. Many rural properties contain soils with Land Use Capability (LUC) Classes between 4-6. Class 4 LUC soils have low arable land which is only suitable for occasional cropping, and Classes 5-6 are not suitable for arable use. By its own definition, the FNDC does not consider Class 4 LUC soils to be versatile. Classes 5-6 LUC land have productive capabilities limited to pasture or forestry. Soil suitability decreases as the LUC Class numbers increase. The PDP does not make any allowance for subdivision on areas of rural and horticultural lands that contain these soil types with limited productivity.

Restricting subdivision options across the entire zone will likely have serious negative impact on the rural community:

- The subdivision regime being proposed will prevent the ability for farmers and horticulturalists to retire in their existing homes with a small area of land;
- Will prevent farmers/horticulturalists and their families from creating small blocks for younger family members to build on and enter the property market;



- Reduce the ability of farmers/horticulturalists to decrease debt burden;
- Discourage diversification.
- Rural and horticultural workers are not always provided on-site accommodation as part of their employment. It is functional and necessary for these workers to be able to source small rural properties which allow them to work more closely to their places of employment, rather than commuting from less suitable urban environments. Not only is this functional and necessary, but it is also more environmentally and economically sustainable than longer distance travel, and would comply with policy TRAN-P2 d.

The Rural Production and Horticultural zones are areas that have scope to have more options available, whilst not negatively impacting on overall productive capacity. There are options for subdivision that should and can be available whilst still being consistent with central government requirements to protect highly versatile soils for productive use.

There needs to be more options than currently being proposed, designed to enable more case by case assessment of the suitability of the land for subdivision to the minimum lot size specified, e.g. there is very little negative impact on overall productivity of a property if 1 or 2 small lots (3,000-1ha lots) are subdivided off, especially if around existing homes and on land not considered highly productive or on highly versatile soils.

I also doubt the logic for applying an 8ha minimum size for discretionary activity lots on the Rural Production Zone. This area seems too small to be a standalone productive unit, yet far too large to be managed for lifestyle/boutique farming, particularly on LUC class soils which have reduced productivity. It would be more appropriate to keep the size at 4ha, and is in keeping with the proposed discretionary size for the new Horticultural Zone, which has similar productive characteristics.

I have submitted elsewhere that there is land in the Rural Production Zone that is likely more appropriately zoned Rural Lifestyle Zone. The latter should be applied in more areas, especially where there are enclaves of rural land already in blocks of less than 8ha.

I seek the following decision from the Council:

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

Amend SUB-S1, minimum lot sizes applying to the Rural Production Zone to:

Controlled Activity: 20ha;

Restricted Discretionary Activity: 12ha; OR in each five year period, up to 2 lots of between 3,000m² and 1ha over the period of the life of the District Plan;

Discretionary Activity: 4ha.

And add the following minimum lot size for the Horticultural Zone:

Restricted Discretionary Activity: In each five year period, up to 2 lots of between 3,000m² and 1ha over the period of the life of the District Plan;

If the Council has concerns about introducing the multiple small lot option as a restricted discretionary activity then it could be introduced as a discretionary activity option. The key should be in the matters to be considered when assessing the land's suitability – location, physical attributes.

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

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)

[Handwritten signature]

Date: *19 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