



Kerikeri Service Centre

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)*

IB-P1 – the identification of “Significant Natural Areas” and related IB-P6 - non regulatory methods to encourage the protection, maintenance and restoration of indigenous biodiversity

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



**My submission is:**

*(Include details and reasons for your position)*

Make IB-6 the very first policy. This policy is 'positive' not negative. It is 'encouraging' not discouraging. It is 'enabling' not punitive. It is the best possible way to start the suite of policies. It sets out what the Council can do for and with the landowner, not what the landowner must do. Make it even more positive and definitive by providing certainty – Council won't just 'consider' non regulatory methods, they will provide for.

Relegate IB-1 to follow IB-6. This policy should refer to SUB-R6 (Environmental Benefit Subdivision) as another time/method to assess the significance of indigenous vegetation, potentially also SUB-R7 (Management Plan).

Comment: Part of what is currently IB-1 clearly places the onus (and cost) on the person seeking to carry out indigenous vegetation clearance to identify any SNA. This is a complete reversal from the methodology promoted in the Draft District Plan which was that the Council bore the initial cost, and had in fact already paid for that work, using ratepayer funds, in mapping SNAs throughout the district. This mapping got dropped through public pressure and landowners were led to believe that SNAs were being dropped altogether. Now they will find that SNAs have not been dropped at all, only their mapping and listing in a Schedule. The Council intends to build up its Schedule and Maps through the methods listed in Policy IB-P1. There is no doubt or argument that habitat of ecological significance need to be identified and protected, it is the methodology that is in question. Is the cost going to fall entirely on a land owner? Or is there scope for shared costs between landowner and community/Council? Is all the work to map SNAs done to date (funded by ratepayers) going to be discarded? Or can that information be retained and be a readily accessible resource available to assist landowner and Council?

The Council must cease and desist in its use of negative, restrictive and punitive language around protecting valuable ecological resources and instead emphasise the positive, and incentivise, to achieve the same outcome.

**I seek the following decision from the Council:**

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

S192.001 Amend IB-P1 by relegating it to follow what is currently IB-P6. Amend by adding an (f) written along similar lines to (e) but referring to the Environmental Benefit Subdivision rule:  
"requiring an assessment of the ecological significance of indigenous vegetation when subdividing pursuant to Rules SUB-R6 or SUB-R7";

S192.002 Amend IB-P6 by making it IB-P1 and by deleting the word "consideration of" from the preamble and simply saying: "... through the following non-regulatory methods:"

S192.003 Include the 'proposed SNA map layer' as a non statutory map layer, available to landowners and professionals to use as a guide to identifying SNA's when preparing applications.

- 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)*

Date: 19 October 22

*(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](mailto: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](http://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**