



Submission on Proposed Far North District Plan

Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Far North District Council - District Planning

Date received: 21/10/2022

This is a submission on the following proposed plan (the **proposal**): Proposed Far North District Plan

Address for service:

Morgan Horsford
 190 Callaghan Road Maromaku RD 1 Kawakawa 0281
 New Zealand
 Email: morgan.horsford@gmail.com

I wish to be heard: No

I am willing to present a joint case: No

Could you gain an advantage in trade competition in making this submission?

-

Are you 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 effects of trade competition

-

Submission points

Point 97.1 **S312.001**

Section: Subdivision

Sub-section: Standards

Provision:

SUB-S1	Minimum allotment sizes	
Zone	Controlled Activity	Discretionary Activity

Rural Production	40ha	8ha
Rural Residential	4,000m ²	2,000m ²
Rural Lifestyle	4ha	2ha
General Residential	600m ²	300m ²
Mixed Use	2,000m ² onsite wastewater disposal 250m ² reticulated wastewater disposal	no minimum lot size
Light Industrial	2,000m ² onsite wastewater disposal 500m ² reticulated wastewater disposal	no minimum lot size
Heavy Industrial	2ha	5,000m ²
Horticulture Processing Facility	2ha	5,000m ²
Horticulture	10ha	4ha
Settlement	3,000m ²	1,500m ²
Kororāreka Russell Township	1,000m ²	800m ²
All other zones	N/A	N/A
All allotments created for public works, network utilities, reserves or access	No minimum lot size	no minimum lot size

Sentiment: Oppose

Submission:

I believe that the proposed minimum allotment sizes in the Rural Production Zones will prove to be detrimental to the character, and eventual survival, of rural communities. While the overall guidelines of limiting the fragmentation and loss of productive land in rural environments are important, as well as the prevention of reverse sensitivity limiting the ability of rural production industries to operate in effective ways, I believe the proposed subdivision guidelines will have significant negative effects on the future of rural communities.

In SD-SP-01 it talks about the need for community wellbeing to be heightened by a sense of place. In rural communities this 'sense of place' is strengthened by continuity and connections between generations of families staying in the same area. The proposed minimum allotments sizes in the Rural Production Zones will prevent older generations of farming families who want to step aside from active rural production work from being able to maintain a connection to the area by dividing off a small piece of land so that they can continue to live where they have helped to establish a community through their working lives. It will also limit the ability of other family members to live in the same community as their siblings who are involved in a rural production business, without every family member having to be directly involved in that kind of business. That not only brings a greater number and variety of people into rural communities, but it also means that if a family member who is involved in a rural production business does decide to sell up and move on, the community does not face the added losses of all the other connected family members, as would happen if they were living in dwellings that were on the business land, but not separately owned by the associated family members.

In SD-SP-03 it also talks about encouraging opportunities for fulfilment of the community's cultural, social, environmental, and economic wellbeing as being important to the social prosperity of an area. These elements of a community, however, are supported by having a variety of people within a community, as well as a sufficient number of people within a community to maintain the overall wellbeing of the community. Within communities that would come under the proposed Rural Production Zone rules, the proposed minimum allotment sizes would make it very difficult for local schools to have sufficient numbers of students to stay open. Also, if the only families that live in the area are actively involved in running or working in larger rural businesses it can become difficult to find people to fulfill other important roles in the community, especially when those work opportunities are either of limited hours or of inconsistent demand and duration. Many rural production businesses are able to find people to fill casual or intermittent work needs, and often at short notice, from those within the community who are not already committed to running or working in another rural production business in the area. As well as small blocks in a rural community providing a pool of people who can fill these kinds of roles, within our own community the roles of school secretary, teacher aide, and school lunch providers are all currently filled by people who live in the community but have the freedom and flexibility of time to take on these roles specifically because they are not directly involved in the operation of a rural production business. In addition, in the past when

older people in the community have needed in-home help and support beyond what could reasonably be provided by immediate family, there have been local people who have had the time and freedom to be employed by home health care organisations to provide this assistance, without these kinds of staff having to travel from distant urban areas.

In relation to the risk of people coming in to a rural production zone area to live on a small block of land and then attempting to limit the operation of the predominant rural production businesses through 'reverse sensitivity' complaints and actions, it seems that there should be some way that these actions can be restricted or controlled by regulation through either local government or central government. Given the powers that District and Regional Councils are wielding in relation to Significant Natural Areas and areas with Outstanding Natural Features and Landscapes and Character, where private land owners can have their freedom to use these areas significantly restricted or completely removed without any say in the matter, there seems to be no reason that these same kinds of powers couldn't be used to restrict the ability of small block owners or tenants to impede the rights of rural production businesses to do whatever reasonable activities are necessary for their successful operation.

In summary, I believe that the proposed minimum allotment sizes in the Rural Production Zones are too restrictive, and will cause more harm than benefit to many rural communities that have a high proportion of rural production businesses. While the proposed rules may provide some potential business operation benefits to the targeted businesses, it will come at the cost of the sense of place, and also the cultural, social, environmental, and economic wellbeing of the communities where these businesses take place.

Relief sought

SUB-S1 Minimum allotment sizes		
Zone	Controlled Activity	Discretionary Activity
Rural Production	40ha 4ha, where the land type, ability to provide on-site services such as power & water supply & waste disposal, existing land use, and residual property size are suitable.	8ha 2ha, 1ha, or 0.5ha as appropriate, where the land type, ability to provide on-site services such as power & water supply & waste disposal, existing land use, and residual property size are suitable.
Rural Residential	4,000m ²	2,000m ²
Rural Lifestyle	4ha	2ha
General Residential	600m ²	300m ²
Mixed Use	2,000m ² onsite wastewater disposal 250m ² reticulated wastewater disposal	no minimum lot size
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All other zones	N/A	N/A
All allotments created for public works, network utilities, reserves or access	No minimum lot size	no minimum lot size

Liz Searle

From: Morgan Horsford <morgan.horsford@gmail.com>
Sent: Thursday, 10 November 2022 7:35 am
To: Proposed District Plan
Subject: Re: Proposed District Plan Submission #312 Morgan Horsford

Categories: Form 5 followup, Liz

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Hi Liz

I can confirm that I CANNOT gain an advantage in trade competition through my submission.

Regards

Morgan Horsford

On Wed, 2 Nov 2022 at 09:56, Proposed District Plan <pdp@fndc.govt.nz> wrote:

Dear Morgan,

Thank you for your submission (as attached) that was received prior to the closing date for submissions.

We've undertaken an initial review of your submission and note that there's some information gaps where council requires further detail, in particular a statement relating to trade competition. I've attached a copy of the submission form which provides an indication of the additional comment required.

If you could either fill in the form and email back to me please (and I'll attach it to your submission), or provide a response to this email confirming that you (the submitter) could/could not gain an advantage in trade competition through the submission, whichever is easiest for you.

Once we've received the necessary information, we'll include it as part of your submission and retain a written record of this correspondence.

We look forward to your response. Please don't hesitate to contact me if there are any matters you'd like to discuss.

Kind regards

Liz Searle

Policy Planner

Strategic Planning & Policy, Far North District Council

+6494070357 | Liz.Searle@fndc.govt.nz

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Far North District Council | Te Kaunihera o Tai Tokerau Ki Te Raki | Phone: 09 401 5200 | Fax: 09 401 2137 |

Email: ask.us@fndc.govt.nz Memorial Avenue, Private Bag 752, Kaikohe 0440, New Zealand

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Far North District Council | Te Kaunihera o Tai Tokerau Ki Te Raki
Ph. 09 401 5200 | Fax. 09 401 2137 | Email. ask.us@fndc.govt.nz
Address. Memorial Avenue, Private Bag 752, Kaikohe 0440, New Zealand

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