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Date: 20 October 2022

Re: Submission on Proposed Far North District Plan (**PDP**) – New Zealand Maritime Park Ltd

Submission Information:

New Zealand Maritime Parks Ltd could not gain an advantage in trade competition through this submission.

The specific provisions of the Plan Changes that New Zealand Maritime Parks Ltd submission relates to are attached.

New Zealand Maritime Parks Ltd seeks amendment to the specific provisions as listed in the attached document. The reasons are provided in the attached document.

The decisions that New Zealand Maritime Parks Ltd wishes Far North District Council (**FNDC**) to make to ensure the issues raised by New Zealand Maritime Park Ltd are dealt with are also contained in the attached document.

New Zealand Maritime Parks Ltd wishes to be heard in support of this submission.

If others make a similar submission, New Zealand Maritime Parks Ltd will consider presenting a joint case with them at a Hearing.

Stuart Galloway

New Zealand Maritime Park Ltd

Submission 251

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1.0 Introduction

New Zealand Maritime Parks Ltd (NZMPL) welcomes the opportunity to submit on the Far North District Council (FNDC), Proposed Far North District Plan (PDP), that was notified to the public on 27 July 2022.

The PDP is of particular interest to NZMPL, as landowners of 14 Baffin Street, Opuā. The site is held in a single Record of Title (RT) referenced NA1857/84 and legally described as Section 9 Block XXII Town of Opuā. The site measures 1179m² with existing development comprising a detached residential unit, garage and access. The site is located on the corner of Baffin and Kellet Street, adjacent to Opuā's industrial marine park, as shown in **Figure 1** below.



Figure 1: Locality Plan of NZMPL's Site of Interest (Source: emaps)

This submission covers matters addressed by the PDP which NZMPL have an interest. Specific points of submission are detailed in **Attachment 1**, whilst general feedback with summarised submission points is detailed in Section 2 below.

1.1 Current Zoning

Currently, the site is zoned Coastal Residential under the Operative District Plan (ODP) and is not subject to any overlays or notations (refer to **Figure 2**).

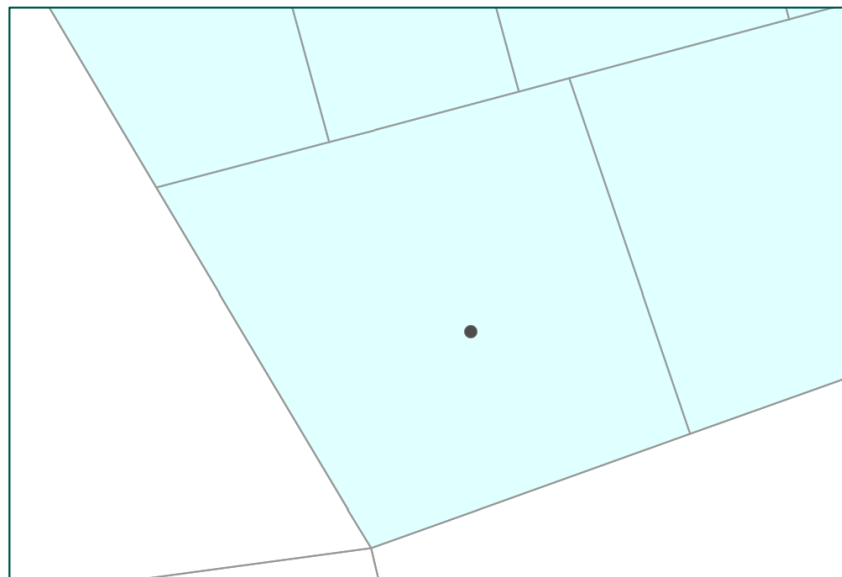


Figure 2: ODP Zoning

1.2 Proposed Zoning

As proposed, General Residential Zone (**GRZ**) with a Coastal Environment Overlay (**CE**) has been applied to NZMPL’s site of interest.



Figure 3: PDP Zoning and Overlays

2.0 General Feedback

NZMPL acknowledges and appreciates the work that FNDC has put into developing the PDP and is generally supportive of the approach to comprehensively review the District Plan. This fosters greater stakeholder and community engagement beyond the statutory process in the RMA.

However, NZMPL considers that amendments are required to provide a more effective planning framework which better acknowledges the lack of suitable business land supply in the Opuia area.

NZMPL have general concern with the approach taken in the Strategic Direction Chapter, noting that while there are objectives, no policies have been included. In NZMPL's view the objectives need policies to demonstrate how they are going to be achieved in the Plan. This is of particular relevance to NZMPL in light of the mapping and provision of business land in the Opuia area.

Further, NZMPL note that the Strategic Direction objectives have not been evaluated under section 32(1)(a) of the RMA, meaning they are unable to confirm whether the notified objectives are the most appropriate and achieve the purpose of the RMA.

NZMPL does not support the application of the GRZ to their site of interest, due to the site's proximity to Opuia's industrial marine park and its susceptibility to Coastal Flood Hazards and the need to manage vulnerable activities from natural hazard risk. In addition to this, NZMPL are concerned that insufficient land has been supplied with respect to business land to meet the expected demand for the Opuia area. The Urban Section 32 Report demonstrates the need to provide additional business land to meet Opuia's development capacity needs. Accordingly, NZMPL seek that FNDC reconsider the application of the GRZ to their site of interest, and rezone the site Mixed Use Zone to enable much needed business land supply in Opuia.

Further to the general feedback provided here, **Attachment 1** covers specific points of submission that are of interest to NZMPL and are considered to improve the plan and effectively achieve the proposed objectives of the plan change package, and the purpose of the RMA.

3.0 Conclusion

In conclusion, New Zealand Maritime Park Ltd seeks the following relief:

- (a) New Zealand Maritime Park Ltd's general feedback in Section 2.0 and specific feedback in Attachment 1 is addressed and necessary changes incorporated into the PDP.
- (b) Any further necessary consequential amendments required to achieve (a) above.

New Zealand Maritime Park Ltd looks forward to working collaboratively with FNDC to address the above relief and is happy to meet with FNDC policy staff or consultants to work through these matters.

