



## **Proposed Far North District Plan**

### **Volume 3 - Summary of Decisions Requested**

SUMMARY OF SUBMISSIONS

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Our Kerikeri Community Charitable Trust (S271)</b>	S271.014	Transport	TRAN-R3	Support	Given that the definition of Transport Infrastructure extends to cycle ways, this rule is supported as it provides for maintenance and upgrade as a permitted activity.	Retain as notified (inferred)
<b>Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)</b>	S425.019	Transport	TRAN-R3	Support	Given that the definition of Transport Infrastructure extends to cycle ways, this rule is supported as it provides for maintenance and upgrade as a permitted activity.	Retain as notified.
<b>Kapiro Conservation Trust (S446)</b>	S446.020	Transport	TRAN-R3	Support	Given that the definition of Transport Infrastructure extends to cycle ways, this rule is supported as it provides for maintenance and upgrade as a permitted activity.	Retain TRAN-R3 (inferred)
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S524)</b>	S524.014	Transport	TRAN-R3	Support	Given that the definition of Transport Infrastructure extends to cycle ways, this rule is supported as it provides for maintenance and upgrade as a permitted activity.	Retain as notified (inferred)
<b>Carbon Neutral NZ Trust (S529)</b>	S529.079	Transport	TRAN-R3	Support	Given that the definition of Transport Infrastructure extends to cycle ways, this rule is supported as it provides for maintenance and upgrade as a permitted activity.	Retain as notified (inferred)
<b>Puketona Business Park Limited (S45)</b>	S45.032	Transport	TRAN-R4	Support	PBPL supports the requirement for a restricted discretionary activity where transport standards are infringed.	Retain the restricted discretionary activity status where transport standards are infringed.
<b>Northland Transportation Alliance (S184)</b>	S184.015	Transport	TRAN-R4	Support in part	No trigger for provision of EV spaces. If the intent of this rule is to allow the installation of EV charging stations as a permitted activity then no further comment. If the intent of the rule is to require the installation of EV charging stations in developments of a certain size or character then consider the addition of a trigger for their installation	No relief sought as intent of rule is to allow the installation of EV charging stations as a permitted activity
<b>BP Oil New Zealand Limited,</b>	S335.028	Transport	TRAN-R4	Support	Permitted activity TRAN-R4 (electric vehicle charging stations) is supported because it will assist to promote a broader network of	Retain Rule TRAN-R4 as notified including PER-1 and the Note

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<b>Mobil Oil New Zealand Limited, Z Energy Limited (S335)</b>					EV charging stations and therefore greater uptake of EV use in the district and would contribute to FNDC's carbon reduction and climate change goals. Performance Standard PER-1 and the associated Note under Rule TRAN-R4 are similarly supported	
<b>Z Energy Limited (S336)</b>	S336.005	Transport	TRAN-R4	Support	Permitted activity Rule TRAN-R4 (electric vehicle charging stations) is supported because it will assist to promote a broader network of EV charging stations and therefore greater uptake of EV use in the district and would contribute to FNDC's carbon reduction and climate change goals. Performance Standard PER-1 and the associated Note under Rule TRAN-R4 are similarly supported	Retain Rule TRAN-R4, including the performance standard PER-1 and Note
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.039	Transport	TRAN-R4	Neutral	Waka Kotahi supports electric charging stations as a permitted activity as part of the parking standards. Consideration could be had to incentivise more electric charging stations to be provided, such as a % threshold of parking, or reduction in parking spaces provided if a % of electric charging stations were provided.	Amend for consideration of rules that would incentivise provision of electric charging stations.
<b>Ngā Tai Ora - Public Health Northland (S516)</b>	S516.039	Transport	TRAN-R4	Not Stated	Ngā Tai Ora generally support Rule TRAN-R4 (Electric Vehicle Charging Stations) which provides a permitted activity status for electric vehicle charging stations. The usage of electric vehicles is increasing and providing for them is prudent in the Far North District Plan. However, this also needs to be furthered by providing for safe and secure electric bicycle and electric scooter (disability) charging stations. The usage of electric bicycles is increasing by both elderly and leisure bicycle users in the Far North District. Providing charging stations would encourage more people being active in Far North communities.	Amend Rule TRAN-R4 to include the requirement to provide safe and secure electric bicycle and electric scooter charging stations.

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<b>Puketona Business Park Limited (S45)</b>	S45.033	Transport	TRAN-R5	Support	PBPL supports the requirement for a restricted discretionary activity where transport standards are infringed.	Retain the restricted discretionary activity status where transport standards are infringed.
<b>Michael John Winch (S67)</b>	S67.001	Transport	TRAN-R5	Oppose	I oppose Rule TRAN-R5 which allows 200 vehicle movements per day from any site, including residential sites that are currently restricted to 20 vehicle movements/day. TRAN-Table 11 also allows traffic from up to 20 residential units per site as a permitted activity. Access to my residence is via a right of way shared with one other residence. The permitted activity rule would allow one of us to set up a business from home generating up to 200 vehicle movements per day with no consideration of the adverse effects on amenity values or the suitability of the right of way for increased traffic. Even where sites gain access directly off a public road, the increased traffic would have adverse effects on the amenity values of neighbouring properties.	Delete TRAN-R5 Trip Generation in the Proposed District Plan and replace with the Traffic Intensity provisions of Section 15.1.6A of the Operative District Plan. In particular, I request that the permitted activity rule for any residential or rural-residential site be limited to 20 vehicle movements per day
<b>Northland Transportation Alliance (S184)</b>	S184.016	Transport	TRAN-R5	Support in part	Add trigger for Integrated Transport Assessment. Consider using WDC language in separate table (WDC District Plan Table TRA 15). Currently all new roads to vest or upgrade of vested roads trigger an ITA; suggest that this requirement is unfair for small developments that only have to upgrade the site frontage. Consider adding to the notes the requirements for an Integrated Transport Assessment.	Amend Rule TRAN-R5 to incorporate a trigger for requiring an Integrated Traffic Assessment.
<b>Haigh Workman Limited (S215)</b>	S215.022	Transport	TRAN-R5	Oppose	We oppose TRAN-R5 / TRAN Table 11. Table 11 allows 200 vehicle movements per day from any site, including residential sites that are currently restricted to 20 vehicle movements/day. Table 11 also allows traffic from up to 20 residential units per site as a permitted activity. The Note to Rule TRAN-R5 states that Rule	Delete TRAN-R5

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					<p>TRAN-R2 may require a private access to be vested as road. TRAN-Table 9 requirements for private accessways is based on the number of residential units, not the number of vehicle movements. TRAN-S2 controls new vehicle crossings, but not increased use of existing crossings. There is therefore no mechanism in the Proposed District Plan that would require a private access to be widened or a vehicle crossing to be upgraded to mitigate the adverse effects of the increased traffic.</p> <p>If access is directly off an existing public road, there is no mechanism for assessing whether the road is adequate for the increased traffic. Multiple sites generating 200 vehicle movements per day could have significant cumulative adverse effects on the road network which as a permitted activity would not be assessed.</p>	
<b>New Zealand Maritime Parks Ltd (S251)</b>	S251.003	Transport	TRAN-R5	Support in part	<p>The trip generation thresholds have changed from zone-specific daily traffic volumes to district-wide standards set by a combination of daily volumes, gross business area, and occupancy-based thresholds.</p> <p>NZMPL are concerned with the proposed approach, as the Transport Chapter includes terms that are not defined, accordingly, it is difficult for NZMPL to determine the activities that would be captured.</p>	Amend TRAN-R5 to reference defined terms consistently applied throughout the plan to provide clarity for plan users.
<b>Ti Toki Farms Limited (S262)</b>	S262.006	Transport	TRAN-R5	Not Stated	<p>The submitter considers that the TRAN-R5 appears to enter into the realm of managing the effects and activities which fall into the domain of Waka Kotahi. When there is no direct access onto Council infrastructure and access meets Waka Kotahi requirements it should not be required to be reviewed by Council as this is a duplication of effort.</p>	Amend TRAN-R5 to ensure that it does not apply to sites or activities which have direct access onto a State Highway or limited access road which has been previously approved by Waka Kotahi.
<b>Ministry of Education Te Tāhuhu o Te</b>	S331.031	Transport	TRAN-R5	Support	<p>The submitter supports TRANS-R5 Trip generation as some schools will exceed the trip generation in TRAN Table-11 and will</p>	Retain rule TRANS-R5 Trip generation as proposed.

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<b>Mātauranga (S331)</b>					require an Integrated Transport Assessment to assess the effects.	
<b>Z Energy Limited (S336)</b>	S336.006	Transport	TRAN-R5	Support	Trip generation is a permitted activity as long as the use or development is no greater than the thresholds in TRAN-Table 11 - Trip Generation. This rule is supported.	Retain Rule TRAN-R5
<b>Waipapa Pine Limited and Adrian Broughton Trust (S342)</b>	S342.014	Transport	TRAN-R5	Support in part	The PDP appears to enter into the realm of the managing those effects and activities which fall within the domain of Waka Kotahi. In this regard the submitter has access onto State Highway 10, the intersection approved by Waka Kotahi. As such there is no direct access onto Council infrastructure. The intersection meets the highway authorities' requirements and is not required to be revised by Council. To assess an activities traffic movements leading to the Highway or LAR is a duplication of effort.	Amend to ensure they do not apply to sites or activities which have direct access onto a State Highway or LAR which has been previously approved by Waka Kotahi
<b>Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd (S344)</b>	S344.007	Transport	TRAN-R5	Not Stated	The trip generation thresholds have changed from zone-specific daily traffic volumes to district-wide standards set by a combination of daily volumes, gross business area, and occupancy-based thresholds. PPHCTL consider this to be a more appropriate trigger for traffic-related considerations. The standards applying to private accessways provide little clarity of when a private access would be required to be upgraded to public road standard for any activity other than residential activities (i.e. visitor accommodation, commercial activities etc.).	Amend TRAN-R5 to provide permitted activity standard for activities complying with the trip generation thresholds, that the exemptions relating to first residential unit, farming and forestry are retained, and to clarify the expectations for EVCS's and upgrading standards for private accessways.
<b>Foodstuffs North Island Limited (S363)</b>	S363.010	Transport	TRAN-R5	Not Stated	The submitter considers that rule TRAN-R5 Trip generation, and the thresholds for supermarket in TRAN-Table 11 - Trip generation, are inadequate particularly for extensions of existing supermarkets.	Amend rule TRAN-R5 Trip generation, to increase the threshold to appropriately provide for supermarkets particularly within zones where supermarkets are a permitted activity, amendments to the

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						provisions to provide for extension of activities.
<b>Marshall Investments Trustee (2012) Limited (S378)</b>	S378.002	Transport	TRAN-R5	Support	The PDP appears to enter into the realm of the managing those effects and activities which fall within the domain of Waka Kotahi. In this regard the submitter has access onto State Highway 10. As such there is no direct access onto Council infrastructure. The intersection meets the highway authorities' requirements and is not required to be revised by Council. To assess an activities traffic movements leading to the Highway or LAR is a duplication of effort.	Amend TRAN-R5 to ensure it does not apply to sites or activities which have direct access onto a State Highway or LAR which has been previously approved by Waka Kotahi
<b>LD Family Investments Limited (S384)</b>	S384.006	Transport	TRAN-R5	Support in part	<p>The PDP appears to enter into the realm of the managing those effects and activities which fall within the domain of Waka Kotahi. In this regard TTFL propose to create a new intersection onto State Highway 10 with all sites created under the subdivision using this new access point.</p> <p>As such there is no direct access onto Council infrastructure. The intersection will meet the highway authorities requirements and is not required to be revised by Council. To assess an activities traffic movements leading to the Highway or LAR is a duplication of effort.</p>	Amend to ensure Rule TRAN-R5 does not apply to sites or activities which have direct access onto a State Highway or LAR which has been previously approved by Waka Kotahi.
<b>McDonalds Restaurants NZ Limited (S385)</b>	S385.008	Transport	TRAN-R5	Support in part	<p>The trip generation thresholds have changed from zone-specific daily traffic volumes to district-wide standards set by a combination of daily volumes, gross business area, and occupancy-based thresholds.</p> <p>As noted in section 2.0 and earlier submission points, the Transport Chapter includes terms that are not defined, accordingly, it is difficult for McDonald's to understand how a McDonald's restaurant would be captured.</p> <p>In terms of extensions and alteration, as</p>	<p>Amend TRAN-R5</p> <ul style="list-style-type: none"> <li>- Reference defined terms consistently applied throughout the plan to provide clarity for plan users</li> <li>- Increase the threshold to appropriately provide for drive through and restaurant/cafes (see sub#5 and sub#6) particularly within zones where they are a permitted activity,</li> <li>- Amend the provisions to provide for extension of activities.</li> </ul>

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					currently drafted, there is no specific direction for how these would be treated where the existing activity already exceed the specified GFA. McDonalds seeks that TRAN-5 be amended to ensure that the rule does not apply where additions and alterations to an activity to not increase the GFA.	
<b>Kapiro Residents Association (S427)</b>	S427.049	Transport	TRAN-R5	Support in part	Many new subdivisions in Kerikeri and the surrounding rural area have greatly increased the volume of traffic using the central shopping/service area and roads leading to/from the CBD (e.g. Kerikeri Road, Waipapa Road, Landing Road, Kapiro Road, Purerua Road). When new developments are approved, insufficient account is taken of the total/cumulative impact of multiple developments on traffic. Other negative impacts on the community are not taken into account - such as such additional levels of noise, disruption and other changes that can affect people, amenity values and the character of the area.	Amend Rule TRAN-R5 to require full consideration of cumulative/combined traffic effects, congestion, emissions, noise etc. in townships and roads, especially roads leading to/from a CBD or service centres [inferred].
<b>Northland Planning and Development 2020 Limited (S502)</b>	S502.091	Transport	TRAN-R5	Support in part	There are other forms of transport to a site such as via bus, shuttles or ferries. As these options generally carry many people it reduces the number of trips required, and parking spaces needed. For many tourist operations this is how people gain access to the site. We seek relief that other forms of transport such as those listed form part of the rule assessment.	Amend TRAN-R5 to include other forms of transport to form part of the rule assessment
<b>Waitangi Limited (S503)</b>	S503.037	Transport	TRAN-R5	Not Stated	There are other forms of transport to a site such as via bus, shuttles or ferries. As these options generally carry many people it reduces the number of trips required, and parking spaces needed. For many tourist operations this is how people gain access to the site.	Amend Rule TRAN-R5 to recognise that other forms of transport such as bus, shuttles or ferries should form part of the rule assessment.
<b>Puketona Business</b>	S45.034	Transport	TRAN-R6	Support	PBPL supports the requirement for a restricted discretionary activity where transport standards are infringed.	Retain the restricted discretionary activity status where transport standards are infringed.



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<b>Park Limited (S45)</b>						
<b>Northland Transportation Alliance (S184)</b>	S184.017	Transport	TRAN-R6	Support in part	Consider adding signage to list of permitted activities. Road crossings, bridges, boardwalks and retaining walls should be considered as a discretionary activity	Amend Rule TRAN-R6 to provide for signage as a permitted activity and road crossings, bridges, boardwalks and retaining walls a discretionary activity
<b>Our Kerikeri Community Charitable Trust (S271)</b>	S271.015	Transport	TRAN-R6	Support	Support the enablement of works within the Twin Coast Trail, this Trail is a critical tourism attraction for the District but also has great potential to operate more as a transportation network.	Retain as notified (inferred)
<b>Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)</b>	S425.020	Transport	TRAN-R6	Support	While PHTTCCT support some recognition of the significance of the Trail, on review of the overview, it appears that the rules pertaining to structures and buildings in the Part 3 Area Specific Matters will apply in addition to TRAN - R6. With this in mind the benefit provided to PHTTCCT is limited and alignment with the direction in the RPS for regionally significant infrastructure is not achieved. It is unclear how this Chapter interacts with the other Part 2 Chapters. For these rules to truly be enabling (and align with the direction of the RPS) TRAN-R6, would need to: <ul style="list-style-type: none"> <li>- Specify buildings as well as structures;</li> <li>- Specify that this rule takes precedent over the rules within the underlying zones; and</li> <li>- Include vegetation and earthworks permitted thresholds that supersede those that would otherwise apply.</li> </ul> As currently drafted, the provisions do not align with the direction of the RPS for regionally significant infrastructure which is otherwise generally provide for infrastructure covered by the Infrastructure Chapter	Amend TRAN -R6 to include additional to truly enable the maintenance, upgrade and extension of the Trail and alignment with the direction of the RPS.
<b>Kapiro Conservation Trust (S446)</b>	S446.021	Transport	TRAN-R6	Support	Support the enablement of works within the Twin Coast Trail, this Trail is a critical tourism attraction for the District but also has great potential to operate more as a transportation	Retain TRAN-R6 (inferred)

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					network. It is hoped that this route, extensions to it and future routes can be mapped in the District Plan with similar enabling rules to provide for development, but also to protect these future corridors from development, and highlight opportunities for land/easement acquisition through subdivision and development.	
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S524)</b>	S524.015	Transport	TRAN-R6	Support	Support the enablement of works within the Twin Coast Trail, this Trail is a critical tourism attraction for the District but also has great potential to operate more as a transportation network.	Retain as notified (inferred)
<b>Carbon Neutral NZ Trust (S529)</b>	S529.080	Transport	TRAN-R6	Support	Support the enablement of works within the Twin Coast Trail, this Trail is a critical tourism attraction for the District but also has great potential to operate more as a transportation network.	Retain as notified (inferred)
<b>Puketona Business Park Limited (S45)</b>	S45.035	Transport	TRAN-R7	Support	PBPL supports the requirement for a restricted discretionary activity where transport standards are infringed.	Retain the restricted discretionary activity status where transport standards are infringed.
<b>Our Kerikeri Community Charitable Trust (S271)</b>	S271.016	Transport	TRAN-R7	Support	Support the enablement of works within the Twin Coast Trail, this Trail is a critical tourism attraction for the District but also has great potential to operate more as a transportation network.	Retain as notified (inferred)
<b>Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)</b>	S425.021	Transport	TRAN-R7	Support	PHTTCCT support the enablement for new sections of the Trail outside of sensitive areas noting earlier submission in regards to policy direction for sensitive areas and sub#18 in regards to ensuring actual enablement	Retain as notified.
<b>Kapiro Conservation Trust (S446)</b>	S446.022	Transport	TRAN-R7	Support	Support the enablement of works within the Twin Coast Trail, this Trail is a critical tourism attraction for the District but also has great potential to operate more as a transportation network. It is hoped that this route, extensions to it and future routes can be mapped in the	Retain TRAN-R7 (inferred)

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					District Plan with similar enabling rules to provide for development, but also to protect these future corridors from development, and highlight opportunities for land/easement acquisition through subdivision and development.	
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S524)</b>	S524.016	Transport	TRAN-R7	Support	Support the enablement of works within the Twin Coast Trail, this Trail is a critical tourism attraction for the District but also has great potential to operate more as a transportation network.	Retain as notified (inferred)
<b>Carbon Neutral NZ Trust (S529)</b>	S529.081	Transport	TRAN-R7	Support	Support the enablement of works within the Twin Coast Trail, this Trail is a critical tourism attraction for the District but also has great potential to operate more as a transportation network.	Retain as notified (inferred)
<b>Puketona Business Park Limited (S45)</b>	S45.036	Transport	TRAN-R8	Support	PBPL supports the requirement for a restricted discretionary activity where transport standards are infringed.	Retain the restricted discretionary activity status where transport standards are infringed.
<b>Haigh Workman Limited (S215)</b>	S215.008	Transport	TRAN-R8	Support in part	We support TRAN-R2 / PER-1 specifying that a private accessway may only serve a maximum of 8 household equivalents. Where a large number of households are served by an accessway, it is more practical, efficient and safe for it to be a public road. For completeness, we recommend that a corresponding permitted activity rule be included in Rule TRAN-R8 requiring 9 or more households to be served by a public road.	Amend TRAN-R8 to include a corresponding permitted activity rule requiring 9 or more households to be served by a public road
<b>Haigh Workman Limited (S215)</b>	S215.012	Transport	TRAN-R8	Support in part	We support the requirement for new public roads to comply with Council standards. However, there are instances where unformed paper roads are formed to serve one or several properties but are not maintained by Council. These roads should be formed as private accessways, not public road standards. Provided Council approval is obtained as landowner and the road is constructed and maintained to appropriate	Insert a new permitted activity clause relating to the formation and use of a paper road for private access where it serves up to 8 households, has Council consent as landowner, is constructed to private access standards and is privately maintained

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					standards, a resource consent should not be required.	
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.040	Transport	TRAN-R8	Oppose	Whilst admirable, the rule appears to undermine the strategic direction set out in the District Plan, so changes need to occur in the policy framework to support this approach. If the overlays are excluded from new roads, it is questionable as to why this does not apply to existing roads, and for State highways to also be exempt.	Delete PER-2 or widen to include provision for State highways and existing roads.
<b>Kapiro Residents Association (S427)</b>	S427.053	Transport	TRAN-R8	Support in part	Many new subdivisions in Kerikeri and the surrounding rural area have greatly increased the volume of traffic using the central shopping/service area and roads leading to/from the CBD (e.g. Kerikeri Road, Waipapa Road, Landing Road, Kapiro Road, Purerua Road). When new developments are approved, insufficient account is taken of the total/cumulative impact of multiple developments on traffic. Other negative impacts on the community are not taken into account - such as such additional levels of noise, disruption and other changes that can affect people, amenity values and the character of the area.	Amend Rule TRAN-R8 to include full consideration of cumulative/combined traffic effects, congestion, emissions, noise etc. in townships and roads, especially roads leading to/from a CBD or service centres [inferred].
<b>Waiaua Bay Farm Limited (S463)</b>	S463.023	Transport	TRAN-R8	Support	With a view towards future road development at Kauri Cliffs to support future residential development, WBF supports the proposed restricted discretionary consenting pathway for roads not meeting the standards of PER-1 or PER-2. If road development cannot comply with these permitted standards, due to locational criteria (i.e., unavoidable siting with the coastal environment) or the need for a highly bespoke road design commensurate with the values of the Special Purpose Zone - Kauri Cliffs (such as streetlighting that does not comply with TRAN-S5), it is appropriate for a restricted discretionary consenting pathway to apply.	Retain Rule TRAN-R8

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<b>Puketona Business Park Limited (S45)</b>	S45.011	Transport	TRAN-R9	Not Stated	There are some existing discrepancies in the Transport chapter of the PDP as notified. Rule TRAN-R2 inadvertently requires discretionary activity consent for a vehicle crossing off a State Highway (as it does not meet PER-3 of that rule), whilst Rule TRAN-R9 expressly allows for new or altered vehicle crossings off a State Highway as a restricted discretionary activity.	Amend to ensure that PER-3 of Rule TRAN-R2 and Rule TRAN-R9 are consistent.
<b>Ti Toki Farms Limited (S262)</b>	S262.007	Transport	TRAN-R9	Not Stated	The submitter considers that the TRAN-R9 appears to enter into the realm of managing the effects and activities which fall into the domain of Waka Kotahi. When there is no direct access onto Council infrastructure and access meets Waka Kotahi requirements it should not be required to be reviewed by Council as this is a duplication of effort.	Amend TRAN-R9
<b>Waipapa Pine Limited and Adrian Broughton Trust (S342)</b>	S342.015	Transport	TRAN-R9	Support in part	The PDP appears to enter into the realm of the managing those effects and activities which fall within the domain of Waka Kotahi. In this regard the submitter has access onto State Highway 10, the intersection approved by Waka Kotahi. As such there is no direct access onto Council infrastructure. The intersection meets the highway authorities' requirements and is not required to be revised by Council. To assess an activities traffic movements leading to the Highway or LAR is a duplication of effort.	Amend to ensure they do not apply to sites or activities which have direct access onto a State Highway or LAR which has been previously approved by Waka Kotahi.
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.041	Transport	TRAN-R9	Support in part	DIS-1 - Amend note to "altered" to include change in use.	Amend as follows: Altered includes, but is not limited to, any widening, narrowing, gradient changing, redesigning, <b>change in use</b> and relocating of a vehicle crossing, but excludes resurfacing.

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<b>Marshall Investments Trustee (2012) Limited (S378)</b>	S378.003	Transport	TRAN-R9	Support	The PDP appears to enter into the realm of the managing those effects and activities which fall within the domain of Waka Kotahi. In this regard the submitter has access onto State Highway 10. As such there is no direct access onto Council infrastructure. The intersection meets the highway authorities' requirements and is not required to be revised by Council. To assess an activities traffic movements leading to the Highway or LAR is a duplication of effort.	Amend TRAN-R9 to ensure it does not apply to sites or activities which have direct access onto a State Highway or LAR which has been previously approved by Waka Kotahi
<b>LD Family Investments Limited (S384)</b>	S384.007	Transport	TRAN-R9	Support in part	The PDP appears to enter into the realm of the managing those effects and activities which fall within the domain of Waka Kotahi. In this regard TTFL propose to create a new intersection onto State Highway 10 with all sites created under the subdivision using this new access point.  As such there is no direct access onto Council infrastructure. The intersection will meet the highway authorities requirements and is not required to be revised by Council. To assess an activities traffic movements leading to the Highway or LAR is a duplication of effort.	Amend to ensure Rule TRAN-R9 does not apply to sites or activities which have direct access onto a State Highway or LAR which has been previously approved by Waka Kotahi.
<b>Kapiro Residents Association (S427)</b>	S427.054	Transport	TRAN-R9	Support in part	Many new subdivisions in Kerikeri and the surrounding rural area have greatly increased the volume of traffic using the central shopping/service area and roads leading to/from the CBD (e.g. Kerikeri Road, Waipapa Road, Landing Road, Kapiro Road, Purerua Road). When new developments are approved, insufficient account is taken of the total/cumulative impact of multiple developments on traffic. Other negative impacts on the community are not taken into account - such as such additional levels of noise, disruption and other changes that can	Amend Rule TRAN-R9 to include full consideration of cumulative/combined traffic effects, congestion, emissions, noise etc. in townships and roads, especially roads leading to/from a CBD or service centres [inferred].

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					affect people, amenity values and the character of the area.	
<b>Good Journey Limited (S82)</b>	S82.016	Transport	Standards	Oppose	The standards are opposed to the extent that car parking minimums are still specified in the Mixed Use zone. Should existing operations wish to more intensively develop their sites in the Mixed Use zone by increasing the amount of "gross business area" and / or the provision of residential accommodation then additional carparks are required. Additional controls such as bicycle parks and end of trip facilities are also required. Intensification and development of Mixed Use areas should be encouraged by the removal of minimum car parking standards in recognition of the benefits that Mixed Use zones can bring in terms of both land use outcomes and travel patterns.	Delete car park minimums in the Mixed Use Zone and other relief that will satisfy the concerns of the submitter.
<b>Reuben Wright (S178)</b>	S178.010	Transport	Standards	Support in part	Rules TRAN-S1-S5 do not appear to have an activity status expressed where any application will comply with the various Rules. It is assumed any subdivision should be either permitted or controlled where it complies with anyone of the rules, and restricted discretionary where it does not comply. An activity status should be referenced for each rule.	[Amend TRAN-S1-S5 to clarify the activity status].
<b>Reuben Wright (S178)</b>	S178.011	Transport	Standards	Support	Rule TRAN-S5 relates to 'Requirements for Streetlighting'. The provision of streetlighting for any new road or road extension should not be a rule but rather a matter that control is reserved over or discretion is restricted to for any subdivision or land use activity.	Amend the requirements for streetlighting relating to TRAN-S5, to a matter that control is reserved over or discretion is restricted to for any subdivision or land use activity.
<b>Haigh Workman Limited (S215)</b>	S215.017	Transport	Standards	Not Stated		Insert standards for sealing public roads where the gradient exceeds 12.5%.
<b>KiwiRail Holdings Limited (S416)</b>	S416.029	Transport	Standards	Support in part	Public safety at level crossings is a key concern for KiwiRail and protection of sightlines is a key means of ensuring this. The inclusion of a standard to ensure	Insert new standards as follows: <b>Sight lines at railway level crossings</b> <b>All zones</b> <b>Activity status: Permitted</b>

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					<p>sightlines are not compromised will support achieving TRAN-01 and TRAN - 03 seeking to protect Regionally Significant Infrastructure, along with other Policy direction such as SIGN-P4 which specifically references signage avoiding sightlines. Compliance with the Standard would provide for the development as a permitted activity, with non-compliance requiring a Restricted Discretionary Activity consent, with discretion restricted to the aspects provided in TR-P3. These relate to safe and efficient use of the site and functioning of the transport network which in particular is relevant to the matters the rule is seeking to address.</p> <p>While KiwiRail does not support the creation of new level crossings without a higher level of safety protection (lights/barriers) over the expected life of the District Plan the potential for Stop or Give Way Controlled level crossings being established cannot be eliminated. This Standard would therefore provide protection for these sightlines. It should be noted that the restart triangle applies at all level crossings, which includes those controlled with barrier arms and signals.</p> <p>This standard could equally be located in Infrastructure section however the Transport Section contains most standards for vehicle safety. Adding the standard to the Transport section ensures that it is clear it applies to all activities Plan wide.</p>	<p><b>where compliance is achieved with railway level crossing sight line standard 'YY'.All zonesActivity status: Restricted discretionary where compliance is not achieved with standard'YY'.Matters of discretion are restricted to:(i)The extent to which the safety and efficiency of railway and road operations will be adversely affected.(ii)Any characteristics of the proposed use that will make compliance unnecessary(ii)Any implications arising from advice from KiwiRailTRAN STANDARD YY: Level Crossing Sight TrianglesApproach sight triangles at level crossings with Stop or Give Way signsBuildings, structures, planting or other visual obstructions must not be located within the restart or approach sightline areas of railway level crossings as shown in the shaded areas of Figure 1: Restart Sightlines and Figure 2 : Approach Sightlines (refer to submission for figures)</b></p>
<b>John Andrew Riddell (S431)</b>	S431.154	Transport	Standards	Not Stated	The amendment is necessary in order to achieve the purpose of the Act.	Amend all objectives, policies, rules and standards relating to providing for vehicles and roading to place much



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						more emphasis on providing for cycling and for walking
<b>Terra Group (S172)</b>	S172.016	Transport	TRANS-S1	Support	Support this standard, as it will achieve positive outcomes for the proposed zone.	Retain as notified (inferred)
<b>Northland Transportation Alliance (S184)</b>	S184.009	Transport	TRANS-S1	Support in part	Suggest that safe and secure parking should also be covered.	Amend TRAN-S1 to include new clause 7 as follows: <b>7. Parking is safe and secure.</b>
<b>Northland Transportation Alliance (S184)</b>	S184.018	Transport	TRANS-S1	Support in part	Current DP allows for provision of bicycle parking and green space in lieu of parking as a discretionary activity - consider including here. Use of an ITA to assess and approve alternatives to minimums. Further question - Kerikeri/Waipapa is close to Tier 3 City - should this area be called out separately in line with the Urban Policy Statement on parking?	Amend Standard TRANS-S1 to provide for bicycle parking spaces in lieu of car parking, using an Integrated Transport Assessment to support alternatives.
<b>Haigh Workman Limited (S215)</b>	S215.002	Transport	TRANS-S1	Support		Retain TRAN-S1
<b>Ministry of Education Te Tāhuhu o Te Mātauranga (S331)</b>	S331.027	Transport	TRANS-S1	Support in part	The submitter supports in part standard TRANS-S1 Requirements for parking, in respect to the TRAN-Table 1 - which requires minimum car parking spaces for primary and secondary schools, kohanga reo and child care centres. The NPS-UD requires Tier 1, 2 and 3 territorial authorities to remove any minimum car parking requirement in their District Plans (see subpart 8 -section 3.38). Council acknowledges that they are not a Tier 3 authority. However, Section 1.5 of the NPSUD states that 'Tier 3 local authorities are strongly encouraged to do the things that tier 1 or 2 local authorities are obliged to do under Parts 2 and 3' of the NPS-UD. Therefore, the submitter encourages council to adopt the NPS-UD and remove minimum	Amend the standard TRANS-S Requirements for parking as follows: Requirements for parking  1. The minimum number of <del>on-site</del> <b>on-site</b> car parking and bicycle spaces are provided for each activity in accordance with TRAN-Table 1 <del>Minimum number of parking spaces</del> , except that: for sites in the Mixed Use zone, no additional on-site parking spaces are required where the nature of a legally established

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					<p>car parking requirements for educational facilities and recommends that loading requirements for primary and secondary schools, kohanga reo and child care centres are also removed from TRAN-Table 3. The ITA should determine how many bus bays or loading areas are appropriate for educational facilities as rural schools may require more buses than schools in urban schools, where students may use public transport or active modes.</p>	<p>activity changes, provided that:</p> <ol style="list-style-type: none"> <li>i. the gross business area of the site is not increased; and</li> <li>ii. it is not a residential activity or visitor accommodation activity;</li> </ol> <p>2. Where on-site parking is provided in accordance with (1) above, additional accessible car parking spaces must be provided in accordance with TRAN-Table 2 - Minimum number of accessible parking spaces;</p> <p>3. Loading spaces for commercial activities, offices, industrial activities, commercial service activities, hospital activities, and educational facilities are provided on site in accordance with TRAN-Table 3 - Minimum on-site loading bay requirements;</p> <p>4. End-of-trip facilities for commercial activities, offices, industrial activities, commercial service activities, hospital activities and educational facilities are provided for staff use in accordance with TRAN-Table 4 - End of trip facility requirements; <b>and</b></p> <p>5. All on-site car parking and manoeuvring areas are provided in accordance</p>

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						<p>with TRAN-Table 5 - Parking and manoeuvring dimensions.; and</p> <p><del>6. If any activity is not represented within TRAN-Table 1 - Minimum number of parking spaces then the activity closest in nature to the proposed activity shall apply, provided that where there are two or more similar activities in the table, the activity with the higher parking rate shall apply.</del></p> <p>Where the standard is not met, matters of discretion are restricted to:</p> <ul style="list-style-type: none"> <li>f. any recommendations in a transport assessment approved by a chartered professional engineer;</li> <li>g. the potential for adverse effects on the safety and efficiency of the transport network, including effects on vehicles, pedestrians and cyclists;</li> <li>h. the scale, management and operation of the activity as it relates to its demand for parking;</li> <li>i. the use of low impact design techniques to minimise stormwater run off; and</li> <li>j. the ability for persons with a</li> </ul>

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						disability or limited mobility to park, enter and exit a vehicle and manoeuvre around a parking area safely and effectively.
<b>Northland Planning and Development 2020 Limited (S502)</b>	S502.095	Transport	TRANS-S1	Oppose	It is considered this is an unnecessary component to add under the District Plan framework to add showers to Commercial, Industrial, Commercial Service activities, Hospitals & Education facilities. There is no commentary in the s32 report to support this provision. Not all areas of the Far North are suitable for alternative modes of transport and the roading network within our rural areas doesn't support cycling or walking to work. The locations where end of trip facilities are practical could rather utilize this provision to reduce the amount of car parks required instead of it being a blanket rule for the activities listed. The assessment criteria if compliance is not achieved also doesn't address matters related to no showers being provided or a reduced number of showers being provided.	Delete Trans-S1 rule 4 - <del>End-of-trip facilities for commercial activities, offices, industrial activities, commercial service activities, hospital activities and educational facilities are provided for staff use in accordance with TRAN-Table 4</del> End of trip facility requirements;
<b>Fire and Emergency New Zealand (S512)</b>	S512.017	Transport	TRANS-S1	Support in part	Fire and Emergency have previously found carparking or lack of parking areas has delayed emergency response times. We seek explicit reference to the effects on emergency response access. In addition see note below on minimum parking requirements	amend TRAN-S1 Where the standard is not met, matters of discretion are restricted to: a. any recommendations in a transport assessment approved by a chartered professional engineer; b. the potential for adverse effects on the safety and efficiency of the transport network, including <b>emergency response access</b> and effects on vehicles, pedestrians and cyclists; c. the scale, management and

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						operation of the activity as it relates to its demand for parking; d. the use of low impact design techniques to minimise stormwater run off; and e. the ability for persons with a disability or limited mobility to park, enter and exit a vehicle and manoeuvre around a parking area safely and effectively
<b>Ngā Tai Ora - Public Health Northland (S516)</b>	S516.040	Transport	TRANS-S1	Support	Ngā Tai Ora support the requirements for bicycle and accessible car parking spaces in TRAN-S1, and the subsequent spaces specified in TRAN-Table 1. It is important that minimum requirements on bicycle and accessible parking spaces are established to encourage active modes of transport and accessibility for the disabled and elderly.	Retain Standard TRAN-S1
<b>Terra Group (S172)</b>	S172.017	Transport	TRANS-S2	Support	Support this standard, as it will achieve positive outcomes for the proposed zone.	Retain as notified (inferred)
<b>Haigh Workman Limited (S215)</b>	S215.013	Transport	TRANS-S2	Support in part	We support Standard TRAN-S2, conditional on amending TRAN-Table 8 as discussed below. Items 1 to 5 address important safety issues regarding vehicle crossing location and should be retained in the District Plan. However, standard TRAN-S2 does not specify the standard to which a vehicle crossing should be constructed. Reference should be made to Council's Engineering Standards for vehicle crossing construction standards. The requirement in the Operative District Plan (Rule 15.1.6C.1.5(b))for vehicle crossings off sealed roads to be sealed has not been included in the Proposed District Plan. Vehicle crossings off sealed roads	Retain Standard TRAN-S2, conditional on amending TRAN-Table 8 Insert a new clause to standard TRAN-S2 requiring new vehicle crossings to be designed and constructed in accordance with Far North District Engineering Standards. Insert a new clause to standard TRAN-S2 requiring vehicle crossings off sealed roads to be sealed or concreted for at least 5m from the road edge to control stormwater runoff and prevent gravel being deposited on the road.

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					should be sealed or concreted for at least 5m from the road edge to control stormwater runoff and prevent gravel being deposited on the road.	
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.042	Transport	TRANS-S2	Support	not stated	Retain TRAN-S2 as notified
<b>Northland Planning and Development 2020 Limited (S502)</b>	S502.097	Transport	TRANS-S2	Support in part	Larger land holdings have multiple titles across a large area. As a result, they have and require a larger number of vehicle crossings. We seek clarification on a situation where you have more than one site frontage. Do you receive the allocated number of crossings per frontage or do you add them together. If the latter, what happens when you have two different road classifications	Amend TRANS-S2 to clarify a situation where you have more than one site frontage.
<b>Waitangi Limited (S503)</b>	S503.041	Transport	TRANS-S2	Not Stated	Larger land holdings such as the Waitangi Estate have multiple titles across a large area. As a result, they have and require a large number of vehicle crossings. We seek clarification on a situation where you have more than one site frontage. Do you receive the allocated number of crossings per frontage or do you add them together. If the latter, what happens when you have two different road classifications?	Amend Standard TRAN-S2 to clarify the number of crossings for a site with more than one frontage.
<b>Kāinga Ora Homes and Communities (S561)</b>	S561.024	Transport	TRANS-S2	Support in part	Support the requirements in this standard however Kāinga Ora seek the addition of matters of discretion where the standard is not met. As it is currently proposed, there is no ability to make the application if you cannot meet the requirements of TRAN-S2.	Amend TRAN-S2 to include the following matters of discretion: <b>Where the standard is not met, matters of discretion are restricted to:</b> a. <b>the potential for adverse effects on the safety and efficiency of the transport network, including effects on vehicles, pedestrians and cyclists;</b> b. <b>the scale, management and operation of the activity as it relates to its</b>

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						<b>demand for access;c. the ability for persons with a disability or limited mobility, enter and exit a vehicle and manoeuvre.</b>
<b>Haigh Workman Limited (S215)</b>	S215.014	Transport	TRANS-S3	Support	<p>We generally support the proposed rule, but consider that greater clarity is required. It is unclear from the standard when and where passing bays are required. Passing bays are specified for Rural Production and Rural Lifestyle zones, however, there may be situations where passing bays are required on long accesses in residential zones. The term 'blind corner' needs clarifying. In road safety terms, a 'blind corner' is where drivers in approaching vehicles have insufficient sight distance to react and stop in time to avoid a collision. Stopping distances need to take into account operating speeds, reaction times, carriageway surface (sealed or unsealed) and longitudinal gradient. A better term is 'safe intervisibility': the sight distance between two vehicles needed to allow them to stop safely. Intervisibility applies to both horizontal and vertical alignment, not just on 'blind corners'. Intervisibility sight distances required for safe access can be large. If the accessway alignment is constrained by topography, intervisibility may not be achieved over significant lengths of the accessway. As the calculation of safe stopping distances / intervisibility is a technical matter, we recommend that the District plan rule refer to the Engineering Standards for guidance. We have commented on appropriate guidance standards in our comments on the Engineering Standards appended to this submission.</p>	<p>Amend standard TRAN-S3 to:</p> <ol style="list-style-type: none"> <li>1. Passing bays are required on single lane accessways exceeding 100m at spacings not exceeding 100m;</li> <li>2. Where required, passing bays on private accessways are to be at least 15m long and provide a minimum usable access width of 5.5m.</li> <li>3. On all single lane accessways serving two or more sites, safe intervisibility shall be provided as specified in Council's Engineering Standards. Sections of accessway without safe intervisibility shall be widened to two-lane.</li> <li>4. All accesses serving two or more sites shall provide vehicle queuing space at the vehicle crossing to the legal road.</li> </ol>

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<b>Kāinga Ora Homes and Communities (S561)</b>	S561.025	Transport	TRANS-S3	Oppose	The requirement for passing bays for accesses serving 2 or more sites is too restrictive given the low traffic volumes this would involve. The Rule does not provide for the majority of accessways being over a short distance with good sightlines. Either the rule should be amended to relate to a larger number of sites, or passing bays should only be a requirement where site conditions pose a safety risk. Kāinga Ora suggest this should be amended to 8 sites to align with the number of sites permitted off a accessway. under the FNDC Engineering standards.	Amend TRAN-S3 3. as follows: 3. All accesses serving <b>28</b> or more sites shall provide passing bays and a double width vehicle crossing to allow for vehicles to queue within the site.
<b>Terra Group (S172)</b>	S172.018	Transport	TRANS-S4	Support	Support this standard, as it will achieve positive outcomes for the proposed zone.	Retain as notified (inferred)
<b>Northland Transportation Alliance (S184)</b>	S184.019	Transport	TRANS-S4	Support in part	Not all upgrades to existing roads should require an ITA - consider using a trip trigger rather than "all". Suggest development over the permitted trip generation require an Integrated Transport Assessment. See submission comment on Rule TRAN R-5	Amend clause 1 of Standard TRAN-S4 to provide a trigger for requiring an Integrated Transport Assessment as opposed to it being a mandatory requirement for all new roads and upgrades.
<b>Borders Real Estate Northland (S211)</b>	S211.003	Transport	TRANS-S4	Support in part	Standard TRANS-S4 (implied) should require subdivisions in urban areas comprising more than two lots to include pedestrian footpaths suitable for disability scooters, and within cycling distance of a township or public facilities (e.g: school, sports field) to include safe cycleways (separated from road traffic) which will connect to a future network of cycleways.	Amend standard TRANS-S4 (implied) to require subdivisions in urban areas comprising more than two lots to include pedestrian footpaths suitable for disability scooters, and within cycling distance of a township or public facilities (e.g: school, sports field) to include safe cycleways (separated from road traffic) which will connect to a future network of cycleways.
<b>Haigh Workman Limited (S215)</b>	S215.015	Transport	TRANS-S4	Support	We support TRAN-S4 clause 1, but oppose the some of the standards specified in Far North District Council Engineering Standards April 2022. Our comments on the Engineering Standards are appended to this submission.	Insert Operative District Plan Appendix 3B-2 standards for Roads to Vest in the Proposed District Plan and amend TRAN-S4 clause 1 to refer to this table, not Engineering



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					<p>Standards for road widths, and the requirements for footpaths and lighting for public roads should be specified in the Proposed District Plan as they are in the Operative District Plan. This allows standards for public roads and private accessways to be found in the same document.</p> <p>Engineering Standards Table 3-2 Urban and Table 3-3 Rural road standards are excessive and inconsistent with Low Impact Design principles. Very few existing Council roads in the Far North District comply with the proposed standards or would be upgraded to comply with the standards. Existing Urban Collector and Arterial roads have insufficient legal width to be upgraded to comply with the standards. Operative District Plan Appendix 3B-2 standards are similar to NZS4404:2010 standards and are more appropriate for Far North roads. Footpaths should be 1.5m wide (not 1.8m wide) and on one side only on urban roads serving up to 20 dwelling units. With rules in the District Plan requiring off-street parking, on-street parking is not required on both sides of an urban road and should be discouraged on Collector and Arterial roads. The District Plan should also specify which roads must be sealed. The Engineering Standards imply that all urban roads should be sealed but some rural roads (ES Table 3-4) may be unsealed. The process for determining which public roads may be unsealed is unclear. Engineering Standards Table 3-4 and Clause 3.2.12.2.3 imply that FNDC's asset engineers will determine which roads may be unsealed by classifying the road under the One Network Road Band Number road classification system. Greater certainty should be given by including standards in the District Plan.</p>	<p>Standards Tables 3-2 and Table 3-3.</p>

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					We oppose standard TRAN-S4 clause 2. It is unclear what Rule TRAN-S4(2) for cul-de-sacs is intended to achieve: many no-exit roads are longer than 150m; pedestrian linkages may not be possible; and cul-de-sac heads when properly designed are ideal for multiple private accessways to branch off.	
<b>Haigh Workman Limited (S215)</b>	S215.018	Transport	TRANS-S4	Oppose	We oppose standard TRAN-S4 clause 2. It is unclear what Rule TRAN-S4(2) for cul-de-sacs is intended to achieve: many no-exit roads are longer than 150m; pedestrian linkages may not be possible; and cul-de-sac heads when properly designed are ideal for multiple private accessways to branch off.	Delete TRAN-S4(2) conditions (i), (ii) and (iii).
<b>Our Kerikeri Community Charitable Trust (S271)</b>	S271.017	Transport	TRANS-S4	Oppose	The construction of roads should exceed the standards in the Engineering Standards, particularly where required by a spatial/strategic document. Support requirement for Traffic Impact Assessment where a new road is constructed. Cul-de-sacs should be disincentivized as they are widely accepted as presenting bad urban design outcomes, and are currently a favoured position of developers due to the lower costs associated.	Amend to: <ul style="list-style-type: none"> <li>• Provide for design that exceeds that required in the Engineering Standards (e.g. provides for separated cyclist network where not otherwise required), particularly where in alignment with a spatial/strategic document.</li> <li>• Disincentivize cul-de-sacs, as a minimum in regard to TRAN-S4.2 The following additional requirements should be included: <ul style="list-style-type: none"> <li>- ITA with targeted information requirements should be required. Without this, cul-de-sacs are essentially further incentivized as a lower costs option.</li> <li>-The cul-de-sac legal width must extend to the boundary of the site to facilitate future connection.</li> </ul> </li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Our Kerikeri Community Charitable Trust (S338)</b>	S338.016	Transport	TRANS-S4	Not Stated	A large survey conducted by Our Kerikeri found that traffic is the single biggest issue for the Kerikeri community. Each new subdivision outside the urban area generates additional traffic. However, intensification of the urban area would allow many more people to live, work or go to school withing a walkable or cyclable distance from home. But this ideal can only be achieved if PDP requires new subdivisions and developments to provide connected walkways and cycleways that will contribute to future networks of walkways and cycleways.	Retain Standard TRAN-S4 (inferred)
<b>Far North District Council (S368)</b>	S368.018	Transport	TRANS-S4	Support in part	The reference to Council engineering standards needs to be applied correctly under 'where the standard is not met, matters of discretion are restricted to: a.' - 'Far North District Council Engineering Standards April 2022'	Amend TRAN-S4 where the standard is not met, matters of discretion are restricted to: safety implications of the non-compliance with <b>Far North District Council Engineering Standards April 2022</b> engineering standards; and
<b>Kapiro Conservation Trust (S446)</b>	S446.016	Transport	TRANS-S4	Oppose	Design of new roads is required in accordance with Councils Engineering Standards (2022) which require all new urban secondary collector and above roads to provide for cyclists separate to the movement lanes on the road, and Rural Road on primary collector and above on a sealed shoulder. For all other roads (which is suspected in the majority, however the road categorization could not be found in the PDP maps) cyclists must use the movement lanes. Provision for cyclists separate to vehicles on most roads throughout the District would be the preference, however, it is understood that the submission period for the	Amend TRANS-S4 to - Provide for design that exceeds that required in the Engineering Standards (e.g. provides for separated cyclist network where not otherwise required), particularly where in alignment with a spatial/strategic document. - Disincentivize cul-de-sacs

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					<p>Engineering Standards has closed.                      It is sought that in the least, provision is made for the construction of roads that exceed the standards in the Engineering Standards, particularly where required by a spatial/strategic document.                      Support requirement for Traffic Impact Assessment where a new road is constructed, noting the request below for an information requirement to clarify minimum information requirements.                      As a general comment, cul-de-sacs should be disincentivized as they are widely accepted as presenting bad urban design outcomes, and are currently a favoured position of developers due to the lower costs associated.                      As a minimum, in regard to TRAN-S4.2 The following additional requirements should be included:                      -ITA with targeted information requirements should be required. Without this, cul-de-sacs are essentially further incentivized as a lower costs option.                      -The cul-de-sac legal width must extend to the boundary of the site to facilitate future connection.</p>	
<p><b>Kapiro Conservation Trust (S449)</b></p>	<p>S449.017</p>	<p>Transport</p>	<p>TRANS-S4</p>	<p>Support</p>	<p>A large survey conducted by Our Kerikeri found that traffic is the single biggest issue for the Kerikeri community. Each new subdivision outside the urban area generates additional traffic. However, intensification of the urban area would allow many more people to live, work or go to school withing a walkable or cyclable distance from home. But this ideal can only be achieved if PDP requires new subdivisions and developments to provide connected walkways and cycleways that will contribute to future networks of walkways and cycleways.</p>	<p>Retain Standard TRAN-S4 (inferred)</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Waiaua Bay Farm Limited (S463)	S463.024	Transport	TRANS-S4	Oppose	Road design in a Special Purpose Zone may not be able to comply with the permitted activity performance standards of this rule, as to do so may conflict with the purpose or objectives of the Special Purpose Zone. In such cases, WBF considers that it would be appropriate for the decision maker to be directed by the matters of discretion to consider the specific circumstances of the Special Purpose Zone.	Insert a new matter of discretion (point c.) within Standard TRANS-S4 as follows: <b>c. Whether an alternative to compliance with the standard would better achieve the purpose and objectives of a Special Purpose Zone.</b>
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S522)	S522.038	Transport	TRANS-S4	Support	A large survey conducted by Our Kerikeri found that traffic is the single biggest issue for the Kerikeri community. Each new subdivision outside the urban area generates additional traffic. However, intensification of the urban area would allow many more people to live, work or go to school withing a walkable or cyclable distance from home. But this ideal can only be achieved if PDP requires new subdivisions and developments to provide connected walkways and cycleways that will contribute to future networks of walkways and cycleways.	Retain Standard TRAN-S4 (inferred)
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S524)	S524.017	Transport	TRANS-S4	Oppose	The construction of roads should exceed the standards in the Engineering Standards, particularly where required by a spatial/strategic document. Support requirement for Traffic Impact Assessment where a new road is constructed. Cul-de-sacs should be disincentivized as they are widely accepted as presenting bad urban design outcomes, and are currently a favoured position of developers due to the lower costs associated.	Amend to: <ul style="list-style-type: none"> <li>• Provide for design that exceeds that required in the Engineering Standards (e.g. provides for separated cyclist network where not otherwise required), particularly where in alignment with a spatial/strategic document.</li> <li>• Disincentivize cul-de-sacs, as a minimum in regard to TRAN-S4.2 The following additional requirements should be included: <ul style="list-style-type: none"> <li>- ITA with targeted information requirements should be required.</li> </ul> </li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						Without this, cul-de-sacs are essentially further incentivized as a lower costs option. - The cul-de-sac legal width must extend to the boundary of the site to facilitate future connection.
<b>Carbon Neutral NZ Trust (S529)</b>	S529.016	Transport	TRANS-S4	Support	A large survey conducted by Our Kerikeri found that traffic is the single biggest issue for the Kerikeri community. Each new subdivision outside the urban area generates additional traffic. However, intensification of the urban area would allow many more people to live, work or go to school withing a walkable or cyclable distance from home. But this ideal can only be achieved if PDP requires new subdivisions and developments to provide connected walkways and cycleways that will contribute to future networks of walkways and cycleways.	Retain Standard TRAN-S4 (inferred)
<b>Carbon Neutral NZ Trust (S529)</b>	S529.082	Transport	TRANS-S4	Oppose	The construction of roads should exceed the standards in the Engineering Standards, particularly where required by a spatial/strategic document. Support requirement for Traffic Impact Assessment where a new road is constructed. Cul-de-sacs should be disincentivized as they are widely accepted as presenting bad urban design outcomes, and are currently a favoured position of developers due to the lower costs associated	Seek amendments that: <ul style="list-style-type: none"> <li>• Provide for design that exceeds that required in the Engineering Standards (e.g. provides for separated cyclist network where not otherwise required), particularly where in alignment with a spatial/strategic document.</li> <li>• Disincentivize cul-de-sacs, as a minimum in regard to TRAN-S4.2 The following additional requirements should be included: <ul style="list-style-type: none"> <li>- ITA with targeted information requirements should be required.</li> </ul> </li> </ul> Without this, cul-de-sacs are essentially further incentivized as a lower costs option. - The cul-de-sac legal width must

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						extend to the boundary of the site to facilitate future connection.
<b>Haigh Workman Limited (S215)</b>	S215.019	Transport	TRANS-S5	Support in part	Streetlighting can be over-used in rural areas creating light wells that render adjoining dark areas unsafe for motorists and pedestrians. Streetlighting can also detract from the amenity and ecological values of a 'dark sky'. The first issue may be addressed through matter of discretion (a), but we recommend further matters of discretion addressing the effect of light spill beyond the road carriageway and footpath and other issues identified in the 'Light' chapter of the Plan.	Insert matters of discretion: the effect of light spill beyond the road carriageway and footpath on amenity and ecological values.
<b>Waiaua Bay Farm Limited (S463)</b>	S463.025	Transport	TRANS-S5	Oppose	Street lighting design in a Special Purpose Zone may not be able to comply with the permitted activity performance standards of this rule, as to do so may conflict with the purpose or objectives of the Special Purpose Zone. In such cases, WBF considers that it would be appropriate for the decision maker to be directed by the matters of discretion to consider the specific circumstances of the Special Purpose Zone.	Insert a new matter of discretion (point c.) within Standard TRANS-S5 as follows: <b>c. Whether an alternative to compliance with the standard would better achieve the purpose and objectives of a Special Purpose Zone.</b>
<b>Te Whatu Ora - Health New Zealand, Te Tai Tokerau (S42)</b>	S42.012	Transport	TRAN-Table 1	Oppose	The proposed car parking standard is too generous as the size of facilities increase to meet Australasian Health Facility Guidelines which are much larger than existing facilities.	Amend the Hospital required car parking space rate to 1 space per 2 beds plus 1 per 2 employees.
<b>Te Whatu Ora - Health New Zealand, Te Tai Tokerau (S42)</b>	S42.013	Transport	TRAN-Table 1	Oppose	The proposed car parking standard is too generous as the size of facilities increase to meet Australasian Health Facility Guidelines which are much larger than existing facilities.	Amend the Healthcare required car parking space rate to 1 space per 2 clinics plus 1 space per 2 employees.
<b>Good Journey Limited (S82)</b>	S82.017	Transport	TRAN-Table 1	Oppose	The tables are opposed to the extent that car parking minimums are still specified in the Mixed Use zone. Should existing operations wish to more intensively develop their sites in the Mixed Use zone by increasing the amount of "gross business area" and / or the provision of	Delete car park minimums in the Mixed Use Zone and other relief that will satisfy the concerns of the submitter.

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					residential accommodation then additional carparks are required. Additional controls such as bicycle parks and end of trip facilities are also required. Intensification and development of Mixed Use areas should be encouraged by the removal of minimum car parking standards in recognition of the benefits that Mixed Use zones can bring in terms of both land use outcomes and travel patterns.	
<b>Horticulture New Zealand (S159)</b>	S159.041	Transport	TRAN-Table 1	Support in part	The table seeks 1 parking space per 100m <sup>2</sup> GBA for horticulture processing and distribution. Where there is large area of cool store this could be reduced as there are not significant numbers of workers in the cool store area.	Amend TRAN-Table 1 to include the following threshold for coolstores associated with Horticulture processing and distribution - one per 500m <sup>2</sup> GBA. Retain the threshold of 1 per 100m <sup>2</sup> GBA for other Horticulture processing and distribution activities
<b>Arvida Group Limited (S165)</b>	S165.009	Transport	TRAN-Table 1	Oppose	The NPS:UD 2020 (para 3.38) states that a Tier 3 territorial authority must change its District Plan if it contains provisions that have the effect of requiring a minimum number of car parks (except accessible car parks).	Delete TRAN - Table 1 -Minimum number of parking spaces.
<b>Northland Transportation Alliance (S184)</b>	S184.020	Transport	TRAN-Table 1	Support in part	Consider adding a column for required EV spaces either here or in separate location if the intent is to encourage installation of EV charging stations (see note under Rule TRAN R-4). Note that bicycle parking is determined by employee numbers (in most cases) not by business type/size. Consider an alternative to the employee number as trigger	Amend TRAN-Table 1 to include a new column for ev spaces and amend the 'required bicycle parking spaces' column to provide alternative thresholds to employee numbers.
<b>Haigh Workman Limited (S215)</b>	S215.003	Transport	TRAN-Table 1	Support		Retain TRAN-TABLE 1
<b>Ti Toki Farms Limited (S262)</b>	S262.009	Transport	TRAN-Table 1	Support	The submitter considers that TRAN-Table 1 as it relates to the requirements for Industrial Activities effectively manages car parking on a site.	Retain provisions of TRAN-Table 1 as it relates to requirements for Industrial Activities.



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Ministry of Education Te Tāhuhu o Te Mātauranga (S331)</b>	S331.028	Transport	TRAN-Table 1	Support in part	<p>The submitter supports in part TRAN-Table 1 which requires minimum car parking spaces for primary and secondary schools, kohanga reo and child care centres. The NPS-UD requires Tier 1, 2 and 3 territorial authorities to remove any minimum car parking requirement in their District Plans (see subpart 8 -section 3.38). Council acknowledges that they are not a Tier 3 authority. However, Section 1.5 of the NPSUD states that 'Tier 3 local authorities are strongly encouraged to do the things that tier 1 or 2 local authorities are obliged to do under Parts 2 and 3' of the NPS-UD. Therefore, the Ministry encourages council to adopt the NPS-UD and remove minimum car parking requirements for educational facilities. The Notice of Requirement process for the Ministry often includes an ITA which would determine an appropriate amount of parking for the school. However, the Ministry support the bicycle parking requirements.</p>	<p>Amend the TRAN-Table 1 as follows:                      Activity --<del>Required car parking spaces</del> -- Required bicycle parking                      Primary and secondary schools -- <del>2 per classroom, plus 1 loading bay for pick-up/drop off</del> -                      - 1 per 15 employees, plus 1 per 20 students                      Kohanga reo Child care centre -- 1 per every 4 children, plus 1 loading bay for pick up/drop off -- 1 per 5 employees</p>
<b>Waipapa Pine Limited and Adrian Broughton Trust (S342)</b>	S342.017	Transport	TRAN-Table 1	Support	<p>The parking thresholds effectively manage the effects of car parking on a site.</p>	<p>Retain the parking requirements for Industrial Activities</p>
<b>Foodstuffs North Island Limited (S363)</b>	S363.008	Transport	TRAN-Table 1	Not Stated	<p>The submitter considers that the retention of minimum parking requirements for supermarket/convenience/general store of 1 car park per 25m<sup>2</sup> GFA and 1 bicycle space per 15 employees, is not consistent with the NPS-UD and therefore should be removed.</p>	<p>Delete minimum parking standards in TRAN-1 for supermarket/convenience/general store of 1 car park per 25m<sup>2</sup> GFA and 1 bicycle space per 15 employees.</p>
<b>Marshall Investments Trustee (2012) Limited (S378)</b>	S378.005	Transport	TRAN-Table 1	Support	<p>The parking thresholds effectively manage the effects of car parking on a site.</p>	<p>Retain the parking requirements for Industrial Activities</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>LD Family Investments Limited (S384)</b>	S384.009	Transport	TRAN-Table 1	Support	The parking thresholds effectively manage the effects of car parking on a site.	Retain the parking requirements for Industrial Activities in TRAN-Table 1.
<b>Waiaua Bay Farm Limited (S463)</b>	S463.026	Transport	TRAN-Table 1	Oppose	This provision is contrary to sub-part 8 (Car Parking) of the National Policy Statement for Urban Development 2020 (May 2022).	Delete TRAN-Table 1
<b>Northland Planning and Development 2020 Limited (S502)</b>	S502.094	Transport	TRAN-Table 1	Support in part	Clarification is sought on how parking is assessed for activities that are not listed within the rule or table. Where an activity does not fit in any one particular category do we utilize the closest activity or does a person need to engage a traffic engineer to determine the number of carparking spaces. Can clarity please be provided on this in the form of a note.	Amend Table 1 to clarify how parking is assessed for activities that are not listed within the rule or table.
<b>Waitangi Limited (S503)</b>	S503.040	Transport	TRAN-Table 1	Not Stated	Clarification is sought on how parking is assessed for activities that are not listed within the rule or table. It is noted that in the Operative District Plan there was a category called places of entertainment which captured activities such as museums which is no longer required. Where an activity does not fit in any one particular category do we utilize the closest activity or does a person need to engage a traffic engineer to determine the number of carparking spaces. Can clarity please be provided on this in the form of a note.	Amend TRAN-Table 1 to clarify how parking is assessed where an activity does not fit in any one particular category.
<b>Ngā Tai Ora - Public Health Northland (S516)</b>	S516.041	Transport	TRAN-Table 1	Support	Ngā Tai Ora support the requirements for bicycle and accessible car parking spaces in TRAN-S1, and the subsequent spaces specified in TRAN-Table 1. It is important that minimum requirements on bicycle and accessible parking spaces are established to encourage active modes of transport and accessibility for the disabled and elderly.	Retain TRAN-Table 1
<b>Jane E Johnston (S560)</b>	S560.001	Transport	TRAN-Table 1	Oppose	These parking requirements are excessive and counter to the policies and objectives for sustainable transport networks, and the promotion of alternative modes of transport (to private car use). The requirements are	Amend TRAN-Table 1 to reduce the requirement for all parking requirements and include maximum spaces to allocate for different

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					also inequitable, with respect to the differences provided for, "per" residential unit across the categories of "residential", "multi-unit development", "papakainga", "retirement village". They are also inequitable in terms of 'places of work' vs places temporarily occupied by people who may require 'visitors' to be accommodated (e.g hospitals, schools, event facilities - such as Marae or Community Halls and recreation spaces).	categories of unit.
<b>Kāinga Ora Homes and Communities (S561)</b>	S561.026	Transport	TRAN-Table 1	Support in part	The Government has signaled the need to move away from constraining the use of urban land suitable for housing by taking away land for on-site carparking. Kāinga Ora recognise the transport alternatives in FDNC are, and will be, limited into the future. As such a reduced requirement to provide onsite parking in conjunction with residential development is requested - 1 parking space per unit.	Amend to reduce the number of parking spaces required for a residential unit activity from 2, to 1 per unit and Tran Table 1 be amended to reflect this.
<b>Good Journey Limited (S82)</b>	S82.018	Transport	TRAN-Table 2	Oppose	The tables are opposed to the extent that car parking minimums are still specified in the Mixed Use zone. Should existing operations wish to more intensively develop their sites in the Mixed Use zone by increasing the amount of "gross business area" and / or the provision of residential accommodation then additional carparks are required. Additional controls such as bicycle parks and end of trip facilities are also required. Intensification and development of Mixed Use areas should be encouraged by the removal of minimum car parking standards in recognition of the benefits that Mixed Use zones can bring in terms of both land use outcomes and travel patterns.	Delete car park minimums in the Mixed Use Zone and other relief that will satisfy the concerns of the submitter.
<b>Haigh Workman Limited (S215)</b>	S215.004	Transport	TRAN-Table 2	Support		Retain TRAN -TABLE 2

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Jane E Johnston (S560)	S560.003	Transport	TRAN-Table 2	Oppose	These parking requirements are insufficient and counter to the policies and objectives with respect to providing sufficient accessibility for those with disabilities and in an aging population. The requirements are also inequitable, with respect to the differences provided for accessibility to commercial areas and to worksites. As more retired people are staying in the workforce, work sites ought to provide for accessibility parking for employees as well as to accommodate clients/customers or visitors.	Amend TRAN-Table 2 to increase the requirement for all accessibility parking requirements.
Kāinga Ora Homes and Communities (S561)	S561.027	Transport	TRAN-Table 2	Support in part	It is unclear within Table 2 as notified how accessible parking is applied to residential development. As such, our amendment provides that clarification.	Amend TRAN-Table 2 - Minimum number of accessible car parking spaces as follows:  Number of parking spaces required 20 or less <b>(except for residential developments as specified below) = 1Residential developments of 10 or more dwellings on a site = 1 (per 10 dwellings)</b>
Good Journey Limited (S82)	S82.019	Transport	TRAN-Table 3	Support	The tables are opposed to the extent that car parking minimums are still specified in the Mixed Use zone. Should existing operations wish to more intensively develop their sites in the Mixed Use zone by increasing the amount of "gross business area" and / or the provision of residential accommodation then additional carparks are required. Additional controls such as bicycle parks and end of trip facilities are also required. Intensification and development of Mixed Use areas should be encouraged by the removal of minimum car parking standards in recognition of the benefits that Mixed Use	Delete car park minimums in the Mixed Use Zoneand other relief that will satisfy the concerns of the submitter.

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					zones can bring in terms of both land use outcomes and travel patterns.	
<b>Haigh Workman Limited (S215)</b>	S215.005	Transport	TRAN-Table 3	Support		Retain TRAN-TABLE 3
<b>Ministry of Education Te Tāhuhu o Te Mātauranga (S331)</b>	S331.029	Transport	TRAN-Table 3	Oppose	The submitter opposes TRAN-Table 3 Minimum on-site loading bar requirements and recommends that all onsite loading requirements be removed. the Notice of Requirement process for the Ministry often includes a ITA. This ITA should determine how many bus bays or loading areas are appropriate for the school as more rural schools may require more buses than schools in residential areas.	Delete TRAN-Table 3 Minimum on-site loading bar requirements
<b>Good Journey Limited (S82)</b>	S82.020	Transport	TRAN-Table 4	Oppose	The tables are opposed to the extent that car parking minimums are still specified in the Mixed Use zone. Should existing operations wish to more intensively develop their sites in the Mixed Use zone by increasing the amount of "gross business area" and / or the provision of residential accommodation then additional carparks are required. Additional controls such as bicycle parks and end of trip facilities are also required. Intensification and development of Mixed Use areas should be encouraged by the removal of minimum car parking standards in recognition of the benefits that Mixed Use zones can bring in terms of both land use outcomes and travel patterns.	Delete car park minimums in the Mixed Use Zone and other relief that will satisfy the concerns of the submitter.
<b>Northland Transportation Alliance (S184)</b>	S184.021	Transport	TRAN-Table 4	Support in part	In terms of end of trip facilities, should there be a requirement for covered, secured bike parking?	Amend TRAN-Table 4 to address requirement for covered, secured bike parking
<b>Ti Toki Farms Limited (S262)</b>	S262.010	Transport	TRAN-Table 4	Oppose	The submitter considers that the requirements of TRAN-Table 4 are more appropriately managed through other legislations and should not be required by a district plan.	Delete TRAN-Table 4

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Ministry of Education Te Tāhuhu o Te Mātauranga (S331)	S331.030	Transport	TRAN-Table 4	Support in part	The submitter supports in part TRAN-Table 4 - End of trip facility requirements for educational facilities to encourage active modes of transport for students and staff noting that most educational facilities will supply showering and changing / clothing storage facilities for sporting activities. The submitter does not support the GFA thresholds and recommend that requirements for end of trip facilities are based on the number of full-time employees.	<p>&lt;p&gt;Amend TRAN-Table 4 - End of trip facility requirements as follows:</p> <p>&lt;p&gt;TRAN-Table 4 - End of trip facility requirements</p> <p>Activity, GFA threshold, Number of showers and changing area required, Educational facilities, <del>Up to 500m2</del> <b>employees</b></p> <p>, No requirement, <del>Greater than 500m2</del> <b>up to 2500m2</b> <b>10-30 full time employees</b></p> <p>, One shower and changing area with space for storage of clothing, <del>Greater than 2500m2 up to 7500m2</del> <b>30-50 full time employees</b></p> <p>, Two showers and changing area with space for storage of clothing. <del>Every additional 7500m2</del> <b>&gt;50 full time employees</b></p> <p>, Two additional showers and changing area with space for storage of clothing.&lt;p&gt;</p>
Waipapa Pine Limited and Adrian Broughton Trust (S342)	S342.018	Transport	TRAN-Table 4	Oppose	The parking thresholds effectively manage the effects of car parking on a site.	delete the table (inferred)
Marshall Investments Trustee (2012)	S378.006	Transport	TRAN-Table 4	Oppose	These requirements are appropriately managed through other legislation and are not required to be embodied into the Proposed District Plan.	Delete TRAN-Table 4

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Limited (S378)</b>						
<b>LD Family Investments Limited (S384)</b>	S384.010	Transport	TRAN-Table 4	Oppose	These requirements are appropriately managed through other legislation and are not required to be embodied into the Proposed District Plan.	Delete TRAN-Table 4.
<b>Northland Planning and Development 2020 Limited (S502)</b>	S502.096	Transport	TRAN-Table 4	Oppose	It is considered this is an unnecessary component to add under the District Plan framework to add showers to Commercial, Industrial, Commercial Service activities, Hospitals & Education facilities. There is no commentary in the s32 report to support this provision. Not all areas of the Far North are suitable for alternative modes of transport and the roading network within our rural areas doesn't support cycling or walking to work. The locations where end of trip facilities are practical could rather utilize this provision to reduce the amount of car parks required instead of it being a blanket rule for the activities listed. The assessment criteria if compliance is not achieved also doesn't address matters related to no showers being provided or a reduced number of showers being provided.	Delete TRAN-Table 4
<b>Good Journey Limited (S82)</b>	S82.021	Transport	TRAN-Table 5	Oppose	The tables are opposed to the extent that car parking minimums are still specified in the Mixed Use zone. Should existing operations wish to more intensively develop their sites in the Mixed Use zone by increasing the amount of "gross business area" and / or the provision of residential accommodation then additional carparks are required. Additional controls such as bicycle parks and end of trip facilities are also required. Intensification and development of Mixed Use areas should be encouraged by the removal of minimum car parking standards in recognition of the benefits that Mixed Use zones can bring in terms of both land use outcomes and travel patterns.	Delete car park minimums in the Mixed Use Zone and other relief that will satisfy the concerns of the submitter.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Terra Group (S172)</b>	S172.021	Transport	TRAN-Table 5	Support	Support TRAN-Table 5 and TRAN-Figure 1, as it will achieve positive outcomes for the proposed zone.	Retain as notified (inferred)
<b>Terra Group (S172)</b>	S172.022	Transport	TRAN-Table 5	Support	Support TRAN-Table 5 and TRAN-Figure 2, as it will achieve positive outcomes for the proposed zone.	Retain as notified (inferred)
<b>Terra Group (S172)</b>	S172.023	Transport	TRAN-Table 5	Support	Support TRAN-Table 5 and TRAN-Figure 3, as it will achieve positive outcomes for the proposed zone.	Retain as notified (inferred)
<b>Northland Transportation Alliance (S184)</b>	S184.022	Transport	TRAN-Table 5	Support in part	Consider including the layout/dimensions/ for accessible parking in the district plan as well or reference NZS 4121- link provided ( <a href="https://nzrf.co.nz/techdocs/Accessible-Parking-Guide.pdf">https://nzrf.co.nz/techdocs/Accessible-Parking-Guide.pdf</a> )	Amend TRAN-Table 5 to include the layout/dimensions for accessible parking or reference NZS 4121
<b>Haigh Workman Limited (S215)</b>	S215.006	Transport	TRAN-Table 5	Support	<p>he Transport section of the Proposed District Plan contains some technical engineering detail that would be better contained in the Engineering Standards. It is our understanding that objectives, policies and rules should be in the District Plan, while technical standards for achieving those objectives should be in Council's Engineering Standards.</p> <p>In some cases, the standards are in the District Plan, in some they are only in the Engineering Standards and in some they are repeated in both documents. There is no consistent approach. For example, the standards for private access are in both the Proposed District Plan and Engineering Standards, while standards for public roads are only specified in the Engineering Standards. It would be simpler and less prone to error if all the key standards for public roads and private access were specified in the District Plan.</p> <p>The parking and manoeuvring dimensions TRAN-Table 5 and Figures 2 to 8 are technical details that should be moved to the Engineering Standards.</p>	Delete TRAN-Table 5, including Figures 1 to 8 and move to Far North District Council Engineering Standards.



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Good Journey Limited (S82)</b>	S82.022	Transport	TRAN-Table 6	Oppose	The tables are opposed to the extent that car parking minimums are still specified in the Mixed Use zone. Should existing operations wish to more intensively develop their sites in the Mixed Use zone by increasing the amount of "gross business area" and / or the provision of residential accommodation then additional carparks are required. Additional controls such as bicycle parks and end of trip facilities are also required. Intensification and development of Mixed Use areas should be encouraged by the removal of minimum car parking standards in recognition of the benefits that Mixed Use zones can bring in terms of both land use outcomes and travel patterns.	Delete car park minimums in the Mixed Use Zone and other relief that will satisfy the concerns of the submitter.
<b>Terra Group (S172)</b>	S172.024	Transport	TRAN-Table 6	Support	Support TRAN-Table 6 as it will achieve positive outcomes for the proposed zone.	Retain as notified (inferred)
<b>Northland Transportation Alliance (S184)</b>	S184.023	Transport	TRAN-Table 6	Support in part	The number of VC's allowed for 61-100m frontage (3) seems excessive. Consider adding language that VC must be taken from the lower classification of roadway to reinforce TRAN R2.	Amend TRAN-Table 6 to consider reducing the number of VC's allowed for 61-100m frontage and consider including a provision that VC must be taken from the lower classification of roadway
<b>Northland Planning and Development 2020 Limited (S502)</b>	S502.098	Transport	TRAN-Table 6	Support in part	Larger land holdings have multiple titles across a large area. As a result, they have and require a larger number of vehicle crossings. We seek clarification on a situation where you have more than one site frontage. Do you receive the allocated number of crossings per frontage or do you add them together. If the latter, what happens when you have two different road classifications	Amend TRAN-Table-6 to clarify a situation where you have more than one site frontage.
<b>Waitangi Limited (S503)</b>	S503.042	Transport	TRAN-Table 6	Not Stated	Larger land holdings such as the Waitangi Estate have multiple titles across a large area. As a result, they have and require a large number of vehicle crossings. We seek clarification on a situation where you have more than one site frontage. Do	Amend TRAN-Table 6 to clarify the number of crossings for a site with more than one frontage.

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					you receive the allocated number of crossings per frontage or do you add them together. If the latter, what happens when you have two different road classifications?	
<b>Good Journey Limited (S82)</b>	S82.023	Transport	TRAN-Table 7	Oppose	The tables are opposed to the extent that car parking minimums are still specified in the Mixed Use zone. Should existing operations wish to more intensively develop their sites in the Mixed Use zone by increasing the amount of "gross business area" and / or the provision of residential accommodation then additional carparks are required. Additional controls such as bicycle parks and end of trip facilities are also required. Intensification and development of Mixed Use areas should be encouraged by the removal of minimum car parking standards in recognition of the benefits that Mixed Use zones can bring in terms of both land use outcomes and travel patterns.	Delete car park minimums in the Mixed Use Zone and other relief that will satisfy the concerns of the submitter.
<b>Good Journey Limited (S82)</b>	S82.024	Transport	TRAN-Table 8	Oppose	The tables are opposed to the extent that car parking minimums are still specified in the Mixed Use zone. Should existing operations wish to more intensively develop their sites in the Mixed Use zone by increasing the amount of "gross business area" and / or the provision of residential accommodation then additional carparks are required. Additional controls such as bicycle parks and end of trip facilities are also required. Intensification and development of Mixed Use areas should be encouraged by the removal of minimum car parking standards in recognition of the benefits that Mixed Use zones can bring in terms of both land use outcomes and travel patterns.	Delete car park minimums in the Mixed Use Zone and other relief that will satisfy the concerns of the submitter.
<b>Haigh Workman Limited (S215)</b>	S215.020	Transport	TRAN-Table 8	Support in part	We oppose the minimum sight distances specified in TRAN-Table 8. Our comments on TRAN-Table 8 are contained in our	Amend TRAN-Table 8 sight distances to be based on 85%ile operating speed and sight distances that are appropriate for sealed and unsealed

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					comments on the draft Engineering Standards	roads in the Far North District. Amend Far North District Engineering Standards April 2022 accordingly.
<b>Good Journey Limited (S82)</b>	S82.025	Transport	TRAN-Table 9	Oppose	The tables are opposed to the extent that car parking minimums are still specified in the Mixed Use zone. Should existing operations wish to more intensively develop their sites in the Mixed Use zone by increasing the amount of "gross business area" and / or the provision of residential accommodation then additional carparks are required. Additional controls such as bicycle parks and end of trip facilities are also required. Intensification and development of Mixed Use areas should be encouraged by the removal of minimum car parking standards in recognition of the benefits that Mixed Use zones can bring in terms of both land use outcomes and travel patterns.	Delete car park minimums in the Mixed Use Zone and other relief that will satisfy the concerns of the submitter.
<b>Northland Transportation Alliance (S184)</b>	S184.013	Transport	TRAN-Table 9	Support in part	Consider addition to Rule TRAN-R2 or TRAN-Table 9 requirements for sealing of private accessways. Suggest the following requirements: permanent all-weather surface in the following instances: Residential Zone Rural and Rural Production sites with an area of less than 2,000m <sup>2</sup> Any accessway serving more than 5 residential units Where the gradient exceeds 12.5% (to confirm this gradient, check against new Engineering Standards)	Amend Rule TRAN-Table 9 to require permanent all-weather surfaces in the following instances: Residential Zone  Rural and Rural Production sites with an area of less than 2,000m <sup>2</sup>  Any accessway serving more than 5 residential units  Where the gradient exceeds 12.5% (to confirm this gradient, check against new Engineering Standards)
<b>Northland Transportation Alliance (S184)</b>	S184.024	Transport	TRAN-Table 9	Support in part	Double check this matches the draft engineering standards - particularly regarding .95m footpath width and consider if there should be a requirement to seal over a certain gradient	Amend TRAN-Table 9 to align with engineering standards and consider incorporating requirement to seal where specific gradient exceeded

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<p><b>Haigh Workman Limited (S215)</b></p>	<p>S215.021</p>	<p>Transport</p>	<p>TRAN-Table 9</p>	<p>Support in part</p>	<p>We support standards for private accessways being specified in the District Plan, however, we oppose some of the provisions.</p> <p>The proposed carriageway widths of 3.0m and 4.5m for one and two-lane carriageways are appropriate and consistent with NZS 4404:2010. The additional 0.95m specified for footpath for Urban accessways serving 5 - 8 residential units is likely to be used by traffic. TRAN-Table 9 standards for Rural Accessways serving 3-8 residential units contains an error - the surfacing width should be 4.0m for 3-5 res units and 2x 2.75m for 6-8 residential units as specified in FNDC Engineering Standards Table 3.16; the total carriageway widths in TRAN-Table 9 are correct.</p> <p>A 4.5 m carriageway width is the bare minimum for two cars to pass on a straight accessway. Extra widening should be provided on horizontal curves to allow a car and an 8 m rigid truck to pass. This would also allow an 11 m rigid truck to traverse the accessway using the whole carriageway. Extra widening should also be provided on single lane accessways to allow an 11 m rigid truck to traverse the accessway</p> <p>he minimum legal width needs to be at least 2.0m wider than the carriageway width to allow for services, batters and the swept path of larger vehicles. The legal width should be increased on horizontal curves to allow for carriageway widening as discussed above.</p> <p>We recommend adding a further standard for private accessways:</p> <p>The minimum carriageway and legal width shall be increased on horizontal curves in accordance with Council's Engineering Standards for private accessways.</p> <p>The Draft Engineering Standards 'rules' on sealing private accessways (ES Table 3-16)</p>	<p>Amend TRAN-Table 9 and add further standards as follows</p> <ul style="list-style-type: none"> <li>- Rural Accessways serving 3-8 residential units- the surfacing width should be 4.0m for 3-5 res units and 2x 2.75m for 6-8 residential units</li> <li>- Include standards for extra widening on horizontal curves</li> <li>- Include rules on when private accessways should be sealed, such as: All urban accessways and Rural accessways serving nine or more households off a sealed public road whether private access or vested as road.</li> <li>- Include standards for sealing shared private accessways where the gradient exceeds 12.5%.</li> </ul>

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					<p>should be in the District Plan. This states that all new urban accessways should be sealed. The requirement in ES Table 3-16 to seal rural accessways serving 6 or more households is arbitrary and unnecessary, particularly when access is off an unsealed public road. It would be simpler to make the threshold the same as for a public road (9 or more) which is required to be sealed. We support the Engineering Standards requirement for accessways to be sealed where the gradient exceeds 12.5%. Steeper unsealed accessways result in greater difficulty in stopping downhill and gaining traction uphill, and higher maintenance costs. This requirement should be included as a District Plan standard in TRAN-Table 9. Note: the term 'Rural' should be defined in the Definitions section as all land that is not defined as 'Urban'</p>	
<b>Kristine Kerr (S302)</b>	S302.003	Transport	TRAN-Table 9	Oppose	<p>6m is too wide for a private accessway for 6-8 houses and is not necessary for safety. 5m is adequate. Increased stormwater impact from increased impervious areas prevents water dispersing naturally. More than 8 houses can be located down a private accessway with no problem and 10m flag lights are not necessary. Should incorporate dark sky guidelines.</p>	<p>Amend to require 5m width for private accessway, more than 8 houses allowed down private roadway and not require 10m high flag lights.</p>
<b>Fire and Emergency New Zealand (S512)</b>	S512.018	Transport	TRAN-Table 9	Oppose	<p>The current requirements in this table contradict with complying with SNZ PAS 4509:2008 under TRAN-R2. The current minimum carriageway width of 3.0m for rural areas and 2-4 residential units in urban areas is not sufficient for fire appliances. Fire and Emergency request that the table is updated to at least 4.0m to allow for emergency response access. In addition the maximum gradient suitable for Fire and Emergency is 16% / 1 in 6. The proposed maximum gradient exceeds this.</p>	<p>Amend table provisions to align with SNZ PAS 4509:2008 by including:</p> <ul style="list-style-type: none"> <li>● a minimum carriageway width of 4.0m</li> <li>● a minimum height clearance of 4.0m</li> <li>● gradient shall not exceed 16%</li> <li>● accessway surfaces must be able to take the weight of a 20 tonne truck</li> </ul>

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<b>Good Journey Limited (S82)</b>	S82.026	Transport	TRAN-Table 10	Oppose	<p>The tables are opposed to the extent that car parking minimums are still specified in the Mixed Use zone.</p> <p>Should existing operations wish to more intensively develop their sites in the Mixed Use zone by increasing the amount of "gross business area" and / or the provision of residential accommodation then additional carparks are required. Additional controls such as bicycle parks and end of trip facilities are also required.</p> <p>Intensification and development of Mixed Use areas should be encouraged by the removal of minimum car parking standards in recognition of the benefits that Mixed Use zones can bring in terms of both land use outcomes and travel patterns.</p>	Delete car park minimums in the Mixed Use Zone and other relief that will satisfy the concerns of the submitter.
<b>Northland Transportation Alliance (S184)</b>	S184.025	Transport	TRAN-Table 10	Support in part	<p>Recommend that both the ONRC and ONF are included or that ONRC is replaced by the ONF. Advise if table of ONF street classifications is needed</p>	Amend TRAN-Table 10 to either include ONF or replace ONRC with ONF
<b>Puketona Business Park Limited (S45)</b>	S45.008	Transport	TRAN-Table 11	Not Stated	<p>The trip generation permitted thresholds are unnecessarily low for industrial activity, generally requiring restricted discretionary activity consent for anything greater than 200m<sup>2</sup> Gross Floor Area, which is a nominal-scaled industrial activity.</p>	<p>Amend TRAN-Table 11 (inferred) to adopt the Auckland Unitary Plan thresholds for trip generation for industrial activities, as follows:</p> <ul style="list-style-type: none"> <li>• Warehousing and storage 20,000m<sup>2</sup> GFA</li> <li>• Other industrial activities 10,000m<sup>2</sup> GFA.</li> </ul>
<b>Michael John Winch (S67)</b>	S67.020	Transport	TRAN-Table 11	Oppose	<p>I oppose TRAN-Table 11 which allows 200 vehicle movements per day from any site, including residential sites that are currently restricted to 20 vehicle movements/day.</p> <p>TRAN-Table 11 also allows traffic from up to 20 residential units per site as a permitted activity.</p> <p>Access to my residence is via a right of way shared with one other residence. The permitted activity rule would allow one of us to set up a business from home generating</p>	Delete TRAN Table 11 Trip Generation in the Proposed District Plan and replace with the Traffic Intensity provisions of Section 15.1.6A of the Operative District Plan. In particular, I request that the permitted activity rule for any residential or rural-residential site be limited to 20 vehicle movements per day.

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					up to 200 vehicle movements per day with no consideration of the adverse effects on amenity values or the suitability of the right of way for increased traffic. Even where sites gain access directly off a public road, the increased traffic would have adverse effects on the amenity values of neighbouring properties.	
<b>Good Journey Limited (S82)</b>	S82.027	Transport	TRAN-Table 11	Oppose	<p>The tables are opposed to the extent that car parking minimums are still specified in the Mixed Use zone.</p> <p>Should existing operations wish to more intensively develop their sites in the Mixed Use zone by increasing the amount of "gross business area" and / or the provision of residential accommodation then additional carparks are required. Additional controls such as bicycle parks and end of trip facilities are also required.</p> <p>Intensification and development of Mixed Use areas should be encouraged by the removal of minimum car parking standards in recognition of the benefits that Mixed Use zones can bring in terms of both land use outcomes and travel patterns.</p>	Delete car park minimums in the Mixed Use Zone and other relief that will satisfy the concerns of the submitter.
<b>Haigh Workman Limited (S215)</b>	S215.023	Transport	TRAN-Table 11	Oppose	<p>We oppose TRAN-R5 / TRAN Table 11. Table 11 allows 200 vehicle movements per day from any site, including residential sites that are currently restricted to 20 vehicle movements/day. Table 11 also allows traffic from up to 20 residential units per site as a permitted activity.</p> <p>The Note to Rule TRAN-R5 states that Rule TRAN-R2 may require a private access to be vested as road. TRAN-Table 9 requirements for private accessways is based on the number of residential units, not the number of vehicle movements. TRAN-S2 controls new vehicle crossings, but not increased use of existing crossings. There is therefore no mechanism in the Proposed District Plan that would require a private access to be widened</p>	Delete TRAN Table 11 Trip Generation and replace it with the Traffic Intensity provisions of Section 15.1.6A of the Operative District Plan.

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					<p>or a vehicle crossing to be upgraded to mitigate the adverse effects of the increased traffic.</p> <p>If access is directly off an existing public road, there is no mechanism for assessing whether the road is adequate for the increased traffic. Multiple sites generating 200 vehicle movements per day could have significant cumulative adverse effects on the road network which as a permitted activity would not be assessed.</p>	
<b>New Zealand Maritime Parks Ltd (S251)</b>	S251.004	Transport	TRAN-Table 11	Support in part	<p>The trip generation thresholds have changed from zone-specific daily traffic volumes to district-wide standards set by a combination of daily volumes, gross business area, and occupancy-based thresholds.</p> <p>NZMPL are concerned with the proposed approach, as the Transport Chapter includes terms that are not defined, accordingly, it is difficult for NZMPL to determine the activities that would be captured.</p>	Amend TRAN-Table 11 to reference defined terms consistently applied throughout the plan to provide clarity for plan users.
<b>Ti Toki Farms Limited (S262)</b>	S262.008	Transport	TRAN-Table 11	Not Stated	<p>The submitter considers that the TRAN-Table 11 appears to enter into the realm of managing the effects and activities which fall into the domain of Waka Kotahi. When there is no direct access onto Council infrastructure and access meets Waka Kotahi requirements it should not be required to be reviewed by Council as this is a duplication of effort.</p>	Amend TRAN-Table 11 to ensure that it does not apply to sites or activities which have direct access onto a State Highway or limited access road which has been previously approved by Waka Kotahi.
<b>Traverse Ltd (S328)</b>	S328.010	Transport	TRAN-Table 11	Not Stated	<p>The trip generation thresholds in TRAN-Table 11 are very low, much lower (for example) than the thresholds in other recently minted plans. The Section 32 report describes the new thresholds as "more enabling".<sup>1</sup> However, when compared to other District Plans, this is not the case.</p>	Amend the trip generation thresholds in TRAN-Table 11 to be in accordance with best practice and to achieve the purpose of the RMA in the context of Section 32.
<b>Ministry of Education Te Tāhuhu o Te Mātauranga (S331)</b>	S331.032	Transport	TRAN-Table 11	Support in part	<p>The submitter supports in part TRAN-Table 11 Trip generation and acknowledges that primary and secondary schools can result in high volumes of traffic, however the thresholds specified in TRAN-Table 11 is low</p>	<p>Amend TRAN-Table 11 Trip generation as follows:</p> <p>Activity, Threshold, Primary and</p>



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					comparatively. The submitter supports the inclusion of different types of educational facilities within TRAN-Table 11 however requests that the primary and secondary school threshold is raised, particularly given the number of students is not an accurate reflection of traffic movements.	secondary schools, <del>10060</del> students
<b>Z Energy Limited (S336)</b>	S336.007	Transport	TRAN-Table 11	Support	Commercial activities are identified in Table 11 where the threshold for trip generation consent under Rule R5 is 200m <sup>2</sup> of Gross Floor Area. Z Energy supports this threshold	Retain TRAN-Table 11
<b>Waipapa Pine Limited and Adrian Broughton Trust (S342)</b>	S342.016	Transport	TRAN-Table 11	Support in part	The PDP appears to enter into the realm of those effects and activities which fall within the domain of Waka Kotahi. In this regard the submitter has access onto State Highway 10, the intersection approved by Waka Kotahi. As such there is no direct access onto Council infrastructure. The intersection meets the highway authorities' requirements and is not required to be revised by Council. To assess an activities traffic movements leading to the Highway or LAR is a duplication of effort.	Amend to ensure they do not apply to sites or activities which have direct access onto a State Highway or LAR which has been previously approved by Waka Kotahi.
<b>Bunnings Limited (S371)</b>	S371.009	Transport	TRAN-Table 11	Support in part	The trip generation thresholds have changed from zone-specific daily traffic volumes to district-wide standards set by a combination of daily volumes, gross business area, and occupancy-based thresholds. For a trade supplier, the restricted discretionary threshold is 450m <sup>2</sup> GFA, any new development that cannot comply with this threshold would trigger a restricted discretionary activity status. As currently drafted, there is no specific direction for extensions, and it considered that where the extension results in a total GFA of or over 200m <sup>2</sup> restricted discretionary consent would be required.	Amend TRAN-Table 11 (inferred) to increase the threshold for trade suppliers particularly within zones where trade suppliers are a permitted activity, and amend the provisions to provide for extension of activities.

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<b>Marshall Investments Trustee (2012) Limited (S378)</b>	S378.004	Transport	TRAN-Table 11	Support	The PDP appears to enter into the realm of the managing those effects and activities which fall within the domain of Waka Kotahi. In this regard the submitter has access onto State Highway 10. As such there is no direct access onto Council infrastructure. The intersection meets the highway authorities' requirements and is not required to be revised by Council. To assess an activities traffic movements leading to the Highway or LAR is a duplication of effort.	Amend TRAN-Table 11 to ensure it does not apply to sites or activities which have direct access onto a State Highway or LAR which has been previously approved by Waka Kotahi
<b>LD Family Investments Limited (S384)</b>	S384.008	Transport	TRAN-Table 11	Support in part	The PDP appears to enter into the realm of the managing those effects and activities which fall within the domain of Waka Kotahi. In this regard TTFL propose to create a new intersection onto State Highway 10 with all sites created under the subdivision using this new access point.  As such there is no direct access onto Council infrastructure. The intersection will meet the highway authorities requirements and is not required to be revised by Council. To assess an activities traffic movements leading to the Highway or LAR is a duplication of effort.	Amend to ensure Rule TRAN-Table 11 does not apply to sites or activities which have direct access onto a State Highway or LAR which has been previously approved by Waka Kotahi.
<b>McDonalds Restaurants NZ Limited (S385)</b>	S385.009	Transport	TRAN-Table 11	Support in part	The trip generation thresholds have changed from zone-specific daily traffic volumes to district-wide standards set by a combination of daily volumes, gross business area, and occupancy-based thresholds. As noted in section 2.0 and earlier submission points, the Transport Chapter includes terms that are not defined, accordingly, it is difficult for McDonald's to understand how a McDonald's restaurant would be captured. In terms of extensions and alteration, as currently drafted, there is no specific direction for how these would be treated where the existing activity already exceed	Amend TRAN - Table 11 - Trip Generation to: - Reference defined terms consistently applied throughout the plan to provide clarity for plan users - Increase the threshold to appropriately provide for drive through and restaurant/cafes (see sub#5 and sub#6) particularly within zones where they are a permitted activity, - Amend the provisions to provide for extension of activities.

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					the specified GFA. McDonalds seeks that TRAN-5 be amended to ensure that the rule does not apply where additions and alterations to an activity to not increase the GFA.	
<b>BR and R Davies (S400)</b>	S400.011	Transport	TRAN-Table 11	Oppose	The trip generation thresholds in TRAN-Table 11 are very low, much lower (for example) than the thresholds in other recently minted plans. The Section 32 report describes the new thresholds as "more enabling". <sup>1</sup> However, when compared to other District Plans, this is not the case.	Amend the trip generation thresholds in TRAN-Table 11 to be in accordance with best practice and to achieve the purpose of the RMA in the context of Section 32.
<b>Kapiro Residents Association (S427)</b>	S427.050	Transport	TRAN-Table 11	Support in part	Many new subdivisions in Kerikeri and the surrounding rural area have greatly increased the volume of traffic using the central shopping/service area and roads leading to/from the CBD (e.g. Kerikeri Road, Waipapa Road, Landing Road, Kapiro Road, Purerua Road). When new developments are approved, insufficient account is taken of the total/cumulative impact of multiple developments on traffic. Other negative impacts on the community are not taken into account - such as such additional levels of noise, disruption and other changes that can affect people, amenity values and the character of the area.	Amend TRAN-Table 11 to have regard to cumulative/combined traffic effects, congestion, emissions, noise etc. in townships and roads, especially roads leading to/from a CBD or service centres [inferred].
<b>Woolworths New Zealand Limited (S458)</b>	S458.005	Transport	TRAN-Table 11	Support in part	The Proposed District Plan currently provides for a trip generation of threshold of 200m <sup>2</sup> for supermarkets. This is considered to be unnecessarily low, noting that many other districts in the country have trip generation thresholds for supermarkets and commercial activities ranging between 1,000m <sup>2</sup> GFA to 2000m <sup>2</sup> GFA. It is considered that a trip generation threshold of 1,500m <sup>2</sup> for supermarket activities is appropriate.	Amend to increase the trip generation threshold for supermarket activities in TRAN-Table 11 to 1500m <sup>2</sup> .

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Northland Planning and Development 2020 Limited (S502)	S502.092	Transport	TRAN-Table 11	Support in part	There are other forms of transport to a site such as via bus, shuttles or ferries. As these options generally carry many people it reduces the number of trips required, and parking spaces needed. For many tourist operations this is how people gain access to the site. We seek relief that other forms of transport such as those listed form part of the rule assessment.	Amend Table 11 to include other forms of transport to form part of the rule assessment
Waitangi Limited (S503)	S503.038	Transport	TRAN-Table 11	Not Stated	There are other forms of transport to a site such as via bus, shuttles or ferries. As these options generally carry many people it reduces the number of trips required, and parking spaces needed. For many tourist operations this is how people gain access to the site.	Amend TRAN-Table 11 to recognise that other forms of transport such as bus, shuttles or ferries should form part of the rule assessment.
Tapuaetahi Incorporation (S407)	S407.007	Natural hazards	Overview	Support in part	The proposed approach will allow for more certainty for landowners within the coastal hazard zones on the site when rebuilding structures which meet the requirements of s10 and s20 of the Act [inferred].	Amend Natural Harzard overview to: ..... <b>Existing Use RightsLandowners have the ability to exercise existing use rights under s10 and s20 of the RMA in relation to re-building structures which meet the requirements of these parts of the Act.</b>
Northland Federated Farmers of New Zealand (S421)	S421.064	Natural hazards	Overview	Support	Federated Farmers supports the accurate mapping of the flood and coastal hazard areas and would expect engagement to occur to the relevant impacted landowners who are located within those areas. We support the use of the precautionary approach in respect of natural hazards. The approach taken by the Council is consistent with regional and national policy documents as well as what is being done internationally. Federated Farmers also supports the approach proposed by the Council that the focus will be placed on vulnerable activities (e.g., liveable dwellings) and it will be these	Retain the Overview or wording with similar effect

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					activities that will have the more stringent plan controls placed on them. Federated Farmers supports enabling non-liveable farm ancillary buildings as permitted activities within the natural hazard areas as along this has been clearly communicated to the landowners along with the associated risks of doing so. This means the landowner is fully informed when they make the decision to locate ancillary buildings that have a functional need to be located in or around coastal and flood hazard areas.	
<b>Fire and Emergency New Zealand (S512)</b>	S512.019	Natural hazards	Overview	Support in part	Wildfire can pose significant risk to property and life. Fire and Emergency support the mitigation measures FNDC have noted. However, we consider that this should not apply solely to new subdivisions but all development.	amend Overview Ensuring adequate water supplies are available for firefighting purposes, appropriate setbacks from vegetation and suitable access for firefighting <del>in new subdivisions.</del> Include reference to the Fire Plan for Northland, Te Hiku in the overview of the chapter.
<b>Kāinga Ora Homes and Communities (S561)</b>	S561.028	Natural hazards	Overview	Support in part	These definitions are more appropriate to be included in the Definitions chapter of the Plan, therefore it is sought that these are deleted from the Overview section of the Natural Hazards chapter. These should be included in the Definitions section of the Plan.	Amend the Overview section of the Natural Hazards chapter as follows: <del>River Flooding Hazards</del> <del>Within areas of flooding, coastal erosion and coastal inundation mapped by the Northland Regional Council and included in the District Plan maps as follows:</del> <del>Flood Hazard Areas 1 in 10 Year River Flood Hazard Area—the area potentially susceptible to river flooding in a 10% Annual Exceedance Probability (AEP) / 10Yr Average Return Interval (ARI) storm event.</del>

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						<p>1 in 100 Year River Flood Hazard Area—the area potentially susceptible to river flooding in a 1% AEP / 100Yr ARI storm event plus climate change. Coastal Hazard Areas (including High Risk Coastal Hazard Area comprising of CFZ1 and CEZ1) Coastal Flood Zone 1 (CFHZ1)— extent of the 50-year ARI static water level at 2080 including 0.6 m sea level rise (RCP8.5M). Coastal Flood Zone 2 (CFHZ2)— extent of the 100-year ARI static water level at 2080 including 1.2 m sea level rise (RCP8.5M). Coastal Flood Zone 3 (CFHZ3)— extent of the 100-year ARI static water level at 2080 including 1.5 m sea level rise (RCP8.5H+). Coastal Erosion Zone 1 (CEHZ1)— an area potentially susceptible to coastal erosion (66% probability) by 2080 with 0.33 m sea level rise from 2019— (RCP 8.5M). Coastal Erosion Zone 2 (CEHZ2)— an area potentially susceptible to coastal erosion (5% probability) by 2130 with 0.85 m sea level rise from 2019— (RCP 8.5M). Coastal Erosion Zone 3 (CEHZ3)— an area potentially susceptible to coastal erosion (5% probability) by 2130 with 1.17 m</p>

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						<p>sea level rise from 2019 – (RCP 8.5H+). Land Instability Land that is susceptible to instability hazards. Land is identified at subdivision through the application of geological information, slope and other criteria as defined in Definitions. Wildfire Ensuring adequate water supplies are available for firefighting purposes, appropriate setbacks from vegetation and suitable access for firefighting in new subdivisions.</p>
<p><b>Top Energy Limited (S483)</b></p>	<p>S483.110</p>	<p>Natural hazards</p>	<p>Objectives</p>	<p>Support</p>	<p>Top Energy supports the acknowledgement of the functional and operational need for infrastructure to be located in areas subject to natural hazards. However, Top Energy also seeks acknowledgment through an objective for the operation, maintenance, repair and upgrade requirements on existing infrastructure within hazard mapped areas to specifically acknowledge the need to provide for existing infrastructure within hazard mapped areas. Inclusion of such a policy will align with/provide a direct link to NH-P10</p>	<p>Insert new objective as follows (or to the same effect): <b>Operation, maintenance, repair and upgrade of existing infrastructure is enabled to ensure a resilient and reliable network.</b></p>
<p><b>Fire and Emergency New Zealand (S512)</b></p>	<p>S512.020</p>	<p>Natural hazards</p>	<p>Objectives</p>	<p>Support</p>	<p>Fire and Emergency have an interest in the natural hazards chapter insofar as to ensure that the District Plan adopts a risk-based approach to hazard management and manages land use in areas subject to natural hazard. Managing land use in relation to hazards and the consequences of climate change will reduce the incidence of, and associated risk to life and property, and prevent or limit injury, damage to property,</p>	<p>retain objectives</p>

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					land and the environment. This will enable Fire and Emergency to carry out its requirements under the Fire and Emergency Act more effectively	
<b>Ngā Tai Ora - Public Health Northland (S516)</b>	S516.004	Natural hazards	Objectives	Support	Ngā Tai Ora support the creation of resilient communities, responding to and managing risk from natural hazards to ensure the health, safety and wellbeing of Northland residents. Ngā Tai Ora is generally supportive of the objectives and policies of the Natural Hazards chapter to the extent that they give effect to the Northland Regional Policy Statement (RPS) and take into account the long-term effects of climate change.	Retain the Objectives to the extent that they give effect to the Northland Regional Policy Statement and take into account the long-term effects of climate change
<b>Ngā Tai Ora - Public Health Northland (S516)</b>	S516.043	Natural hazards	Objectives	Not Stated	Ngā Tai Ora support the creation of resilient communities, responding to and managing risk from natural hazards to ensure the health, safety and wellbeing of Northland residents. Ngā Tai Ora is generally supportive of the Natural Hazards chapter to the extent that they give effect to the Northland Regional Policy Statement and take into account the long-term effects of climate change, including the influence of climate change on people. The PDP must acknowledge and minimise the risks and impacts of natural hazards, including the influence of climate change, on people, property and infrastructure, consistent with objective 3.13 Natural hazard risk of the Northland Regional Policy Statement.	Amend Natural Hazards objectives, policies and rules to appropriately give effect to the Northland Regional Policy Statement which seeks to manage subdivision, use and development to minimise the risk from natural hazards.
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.043	Natural hazards	NH-01	Support	not stated	Retain NH-01 as notified
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.037	Natural hazards	NH-01	Not Stated	Cultural and heritage sites are also at risk from natural hazards (for example coastal urupā or particular coastal trees). The maintenance of these sites is important to tangata whenua	Amend Objective NH-01 as follows: The risks from natural hazards to people, infrastructure and property <b>and cultural and heritage resources</b> are managed, including



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					because they are seen as a physical connection to tūpuna.	taking into account the likely long-term effects of climate change, to ensure the health, safety and resilience of communities.
<b>Tapuaetahi Incorporation (S407)</b>	S407.008	Natural hazards	NH-01	Support in part	The proposed approach will allow for more certainty for landowners within the coastal hazard zones on the site when rebuilding structures which meet the requirements of s10 and s20 of the Act [inferred].	Amend NH-01 to: The risks from natural hazards to people, infrastructure and property are managed, including taking into account the likely long-term effects of climate change, to ensure the health, safety and resilience of communities, <b>noting that existing use rights may apply in certain situations.</b>
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.065	Natural hazards	NH-01	Support	Federated Farmers supports objectives NH-01 to NH-04 as currently drafted.	Retain Objective NH-01 or ensure that amendments include similar wording that achieves the same intent
<b>Transpower New Zealand Ltd (S454)</b>	S454.070	Natural hazards	NH-01	Support	Transpower supports the inclusion of this policy in the FNPDP.	Retain NH-01
<b>Kāinga Ora Homes and Communities (S561)</b>	S561.029	Natural hazards	NH-01	Support	The objective acknowledges the real impacts both natural hazards and climate change can have on any urban growth and development, enabling management tools to be put in place.	Retain NH-01 as notified.
<b>Tapuaetahi Incorporation (S407)</b>	S407.009	Natural hazards	NH-02	Support in part	The proposed approach will allow for more certainty for landowners within the coastal hazard zones on the site when rebuilding structures which meet the requirements of s10 and s20 of the Act [inferred].	Amend NH-02 to: Land use and subdivision does not increase the risk from natural hazards or risks are mitigated, and existing risks are reduced where there are practicable opportunities to do so, <b>noting that existing use rights may apply in certain situations.</b>

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<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.066	Natural hazards	NH-02	Support	Federated Farmers supports objectives NH-O1 to NH-O4 as currently drafted.	Retain Objective NH-O2 or ensure that amendments include similar wording that achieves the same intent
<b>Kāinga Ora Homes and Communities (S561)</b>	S561.030	Natural hazards	NH-02	Support	This new approach by FNDC to address risks from natural hazards is supported. The increasing risk from natural hazards due to climate change must be managed and this objective provides the framework for new provisions within the plan to address this risk.	Retain NH-O2 as notified.
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.044	Natural hazards	NH-03	Support	not stated	Retain NH-O3 as notified
<b>KiwiRail Holdings Limited (S416)</b>	S416.030	Natural hazards	NH-03	Support	Recognition that in some instances there are operational and functional needs for activities to locate within hazard areas, is supported. The rail network has been in place for many years and for various operational reasons, is unable to be easily relocated to avoid such hazard areas.	Retain Objective NH-O3
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.067	Natural hazards	NH-03	Support	Federated Farmers supports objectives NH-O1 to NH-O4 as currently drafted. In particular, we support objective NH-O3 which recognises that there may be a functional need for new infrastructure to be located within identified hazard areas.	Retain Objective NH-O3 or ensure that amendments include similar wording that achieves the same intent
<b>Transpower New Zealand Ltd (S454)</b>	S454.071	Natural hazards	NH-03	Support	Transpower supports the inclusion of this objective in the FNPDP.	Retain NH-O3
<b>Kāinga Ora Homes and Communities (S561)</b>	S561.031	Natural hazards	NH-03	Support	This objective provides the framework to enable necessary infrastructure while balancing this need with the risk of natural hazards.	Retain NH-O3 as notified.
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.068	Natural hazards	NH-04	Support	Federated Farmers supports objectives NH-O1 to NH-O4 as currently drafted.	Retain Objective NH-O4 or ensure that amendments include similar wording that achieves the same intent

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<b>Kāinga Ora Homes and Communities (S561)</b>	S561.032	Natural hazards	NH-04	Support	Kāinga Ora support this objective which provides the framework for policies and rules supporting natural defenses above man-made defenses against hazard risks.	Retain NH-04 as notified.
<b>Te Runanga o Ngai Takoto Trust (S390)</b>	S390.074	Natural hazards	Policies	Support	The submitter supports the inclusion of a new policy as community adaptation to the effects of climate change, should be part of the planning response to RMA s7(i). Possible methods of adaptation, such as managed retreat from hazard risk areas, are not addressed in the PDP. This new policy is intended to introduce those issues, and needs to be supported by methods of implementation, including an allocation of funding by council.	Inserts a new policy to read as follows: NH-P15 Adaptation to climate change. Increase the ability of the community to adapt to the effects of climate change by ensuring the potential environmental and social costs of climate change, including effects on indigenous biodiversity, historic heritage, mahinga kai, public health and safety, public access to the coast and waterway margins, and the built environment are known and addressed.
<b>Te Rūnanga o Whaingaroa (S486)</b>	S486.088	Natural hazards	Policies	Support	Te Rūnanga o Whaingaroa would like to highlight that community adaptation to the effects of climate change, which should be part of the planning response to RMA s7(i). Possible methods of adaptation, such as managed retreat from hazard risk areas, are not addressed in the PDP. This new policy is intended to introduce those issues, and needs to be supported by methods of implementation, including an allocation of funding by council.	Insert a new policy as follows: <b>NH-P15 Adaptation to climate change.Increase the ability of the community to adapt to the effects of climate change by ensuring the potential environmental and social costs of climate change, including effects on indigenous biodiversity, historic heritage, mahinga kai, public health and safety, public access to the coast and waterway margins, and the built environment are known and addressed.</b>

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<b>Te Rūnanga Ā Iwi O Ngāpuhi (S498)</b>	S498.075	Natural hazards	Policies	Support	The submitter supports the inclusion of a new policy as community adaptation to the effects of climate change, should be part of the planning response to RMA s7(i). Possible methods of adaptation, such as managed retreat from hazard risk areas, are not addressed in the PDP. This new policy is intended to introduce those issues, and needs to be supported by methods of implementation, including an allocation of funding by council.	Inserts a new policy to read as follows: NH-P15 Adaptation to climate change. Increase the ability of the community to adapt to the effects of climate change by ensuring the potential environmental and social costs of climate change, including effects on indigenous biodiversity, historic heritage, mahinga kai, public health and safety, public access to the coast and waterway margins, and the built environment are known and addressed.
<b>Fire and Emergency New Zealand (S512)</b>	S512.021	Natural hazards	Policies	Support	Fire and Emergency have an interest in the natural hazards chapter insofar as to ensure that the District Plan adopts a risk-based approach to hazard management and manages land use in areas subject to natural hazard. Managing land use in relation to hazards and the consequences of climate change will reduce the incidence of, and associated risk to life and property, and prevent or limit injury, damage to property, land and the environment. This will enable Fire and Emergency to carry out its requirements under the Fire and Emergency Act more effectively	retain policies
<b>Ngā Tai Ora - Public Health Northland (S516)</b>	S516.005	Natural hazards	Policies	Support	Ngā Tai Ora support the creation of resilient communities, responding to and managing risk from natural hazards to ensure the health, safety and wellbeing of Northland residents. Ngā Tai Ora is generally supportive of the objectives and policies of the Natural Hazards chapter to the extent that they give effect to the Northland Regional Policy Statement (RPS) and take into account the long-term effects of climate change.	Retain the Policies to the extent that they give effect to the Northland Regional Policy Statement and take into account the long-term effects of climate change

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<b>Ngā Tai Ora - Public Health Northland (S516)</b>	S516.044	Natural hazards	Policies	Not Stated	Ngā Tai Ora support the creation of resilient communities, responding to and managing risk from natural hazards to ensure the health, safety and wellbeing of Northland residents. Ngā Tai Ora is generally supportive of the Natural Hazards chapter to the extent that they give effect to the Northland Regional Policy Statement and take into account the long-term effects of climate change, including the influence of climate change on people. The PDP must acknowledge and minimise the risks and impacts of natural hazards, including the influence of climate change, on people, property and infrastructure, consistent with objective 3.13 Natural hazard risk of the Northland Regional Policy Statement.	Amend Natural Hazards objectives, policies and rules to appropriately give effect to the Northland Regional Policy Statement which seeks to manage subdivision, use and development to minimise the risk from natural hazards.
<b>Te Rūnanga o Ngāti Rēhia (S559)</b>	S559.052	Natural hazards	Policies	Support in part	The amendment is to ensure recharge is maintained.	Insert a policy into the PDP which requires low impact stormwater design for new development.
<b>Puketona Business Park Limited (S45)</b>	S45.013	Natural hazards	General	Support	Generally support the provisions of the Hazards chapter of the PDP as notified.	Retain the provisions of the Natural hazards chapter.
<b>Lynley Newport (S94)</b>	S94.004	Natural hazards	General	Oppose	It is confusing when reading the Natural hazards chapter. At the end of the policies, one of which relates solely to Coastal Hazards (NH-P7), there is the statement that 'Coastal Hazard Rules are located in the Coastal Environment Chapter'. I am of the opinion that all natural hazard objectives, policies and rules should be in one place - in this instance the Natural Hazards Chapter.	Amend the Natural hazards chapter to transfer any provisions from the Coastal Environment section relating to hazards to the Natural Hazards chapter
<b>Kāinga Ora Homes and Communities (S561)</b>	S561.033	Natural hazards	NH-P1	Support in part	Kāinga Ora support this policy however seek that hazard maps are removed from the FNPDP and placed in a non-statutory layer. At the same time, further investigation into flood risk particularly given the significant extent experienced in parts of the District. This review should address the depth of	Retain NH-P1 as notified. Wording is general - Map or define areas that are known to be subject to the following natural hazards, taking into account accepted estimates of climate change and sea level rise: a. flooding;

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					flood waters, velocity, timing of flooding to identify locations of high risk and low risk and amend zoning in those locations accordingly.	b. coastal erosion; c. coastal inundation; and d. land instability.
Ministry of Education Te Tāhuhu o Te Mātauranga (S331)	S331.033	Natural hazards	NH-P2	Support in part	The submitter supports in part the policy NH-P2 and acknowledges the risk which natural hazards can pose on people, property and the environment. However, at times the Ministry also have an operational need to provide educational facilities to existing communities in environments susceptible to the growing pressures of natural hazard risk and climate change.	Amend policy NH-P2 as follows: Manage land use and subdivision so that natural hazard risk is not increased or is mitigated, giving consideration to the following:  a. the nature, frequency and scale of the natural hazard; b. not increasing natural hazard risk to other people, property, infrastructure and the environment beyond the site; c. the location of building platforms and vehicle access; d. the use of the site, including by vulnerable activities; e. the location and types of buildings or structures, their design to mitigate the effects and risks of natural hazards, and the ability to adapt to long term changes in natural hazards; f. earthworks, including excavation and fill; g. location and design of infrastructure; h. activities that involve the use and storage of hazardous substances; i. aligning with emergency management approaches and requirements; j. whether mitigation results in transference of natural hazard risk to other locations or exacerbates the natural hazard; <del>and</del> k. reduction of risk relating

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						to existing activities; <b>and I. the operational need for the activity to be located near or within, an area identified as being affected by a natural hazard.</b>
<b>Tapuaetahi Incorporation (S407)</b>	S407.010	Natural hazards	NH-P2	Support in part	The proposed approach will allow for more certainty for landowners within the coastal hazard zones on the site when rebuilding structures which meet the requirements of s10 and s20 of the Act [inferred].	Amend NH-P2 to: Manage land use and subdivision so that natural hazard risk is not increased or is mitigated, giving consideration to the following: <b>.....I. consideration of existing use rights.</b>
<b>Kāinga Ora Homes and Communities (S561)</b>	S561.034	Natural hazards	NH-P2	Support	This policy provides the framework for new provisions within the plan to address the risks from natural hazards.	Retain NH-P2 as notified.
<b>Kāinga Ora Homes and Communities (S561)</b>	S561.035	Natural hazards	NH-P3	Support	This new approach by FNDC to address risks from natural hazards is supported. This policy sets up the framework for rules to manage land use and subdivision in locations of natural hazards more appropriately than under the Operative Plan.	Retain NH-P3 as notified.
<b>Kāinga Ora Homes and Communities (S561)</b>	S561.036	Natural hazards	NH-P5	Support	This new approach by FNDC to address risks from natural hazards is supported. This policy sets up the framework for rules to manage land use and subdivision in locations of natural hazards more appropriately than under the Operative Plan.	Retain NH-P5 as notified.
<b>Lynley Newport (S94)</b>	S94.001	Natural hazards	NH-P6	Oppose	Policy NH-P6 reads as a rule, not a policy. A policy cannot "require" anything because it is not a rule. Parroting the Regional Policy Statement is not valid. That document is not a rules document in the first instance. It is far too specific and directive as a policy. The Council should be placing reliance on	Amend Policy NH-P6 - <i>Manage land use and subdivision in river flood hazard areas to avoid, remedy or mitigate the risk from flood hazard to protect</i> the subject site

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					<p>rules to achieve compliance and where compliance is not possible or practicable, then to achieve remedy and/or mitigation.</p>	<p>and its development, and other property, by requiring: a. subdivision applications to identify building platforms that will not be subject to inundation and material damage (including erosion) in a 1 in 100-year flood event; b. a minimum freeboard for all buildings designed to accommodate vulnerable activities of at least 500mm above the 1 in 100-year flood event and at least 300mm above the 1 in 100-year flood event for other new buildings; c. commercial and industrial buildings to be constructed so they will not be subject to material damage in a 1 in 100-year flood event; d. buildings within a 1 in 10 Year River Flood Hazard Area to be designed to avoid material damage in a 1 in 100-year flood event; e. storage and containment of hazardous substances so that the integrity of the storage method will not be compromised in a 1 in 100-year flood event; f. earthworks (other than earthworks associated with flood control works) do not divert flood flow onto surrounding properties and</p>



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						<del>do not reduce flood plain storage capacity within a 1 in 10 Year River Flood Hazard area;g. ——— the capacity and function of overland flow paths to convey stormwater flows safely and without causing damage to property or the environment is retained, unless sufficient capacity is provided by an alternative method; and h. ——— the provision of safe vehicle access within the site.</del>
<b>Horticulture New Zealand (S159)</b>	S159.042	Natural hazards	NH-P6	Support in part	Non-habitable buildings are less of a risk and should be provided for, e.g. farm sheds and artificial crop protection structures	Amend Policy NH-P6 to include provisions for non-habitable buildings
<b>Kāinga Ora Homes and Communities (S561)</b>	S561.037	Natural hazards	NH-P6	Support	Policy NH-P6 is consistent with Objectives NH-O1 and NH-O2 and supports rules to appropriately address river flood hazards.	Retain NH-P6 as notified.
<b>Lynley Newport (S94)</b>	S94.002	Natural hazards	NH-P7	Oppose	Policy NH-P7 reads as a rule or standard, not a policy. It is far too specific and directive as a policy. The Council should be placing reliance on rules to achieve compliance and where compliance is not possible or practicable, then to achieve remedy and/or mitigation.	Amend Policy NH-P7 - <i>Manage new land use and subdivision in coastal hazard areas to avoid, remedy or mitigate the risk from coastal hazard to the subject site and its development and other property so that:</i> a. ——— new subdivision avoids locating building platforms within High Risk Coastal Hazard areas and building platforms should be located outside other coastal hazard areas where alternative

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						<p>locations are available and it is practicable to do so;b. new buildings containing vulnerable activities are not located within High Risk Coastal Hazard areas unless:i. there is no other suitable location available on the existing site;ii. hazard risks can be mitigated without the need for hard protection structures.c. where a building or building platform is located with a coastal hazard area, it should be designed and constructed such that:i. the building platform will not be subject to inundation and /or material damage (including erosion) over a 100-year timeframe; and eitherii.the finished floor level of any building accommodating a vulnerable activity must be at least 500mm above the maximum water level in a 1 percent AEP flood event plus 1m sea level rise; oriii. the finished floor level of any other building must be at least 300mm above the maximum water level in a 1 percent AEP flood event plus 1m sea level rise.d. hazard risk is not transferred to, or increased on, other properties;e. buildings,</p>

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						<del>building platforms, access and services are located and designed to minimise the need for hard protection structures;f. safe vehicle access within the site is provided; andg. services are located and designed to minimise the risk of natural hazards.</del>
Lynley Newport (S94)	S94.003	Natural hazards	NH-P7	Oppose	Policy NH-P7 includes typographical error in the heading	Amend heading to Policy NH-P7 - Coastal hazard
Director-General of Conservation (Department of Conservation ) (S364)	S364.028	Natural hazards	NH-P7	Support in part	The heading of this policy has a spelling error.	Amend Policy NH-P7 to correct "cestal hazard" to " <b>coastal</b> hazard".
Tapuaetahi Incorporation (S407)	S407.011	Natural hazards	NH-P7	Support in part	The proposed approach will allow for more certainty for landowners within the coastal hazard zones on the site when rebuilding structures which meet the requirements of s10 and s20 of the Act [inferred].	Amend NH-P7 to: Manage new land use and subdivision in coastal hazard areas so that: ..... <b>h. Existing use rights are appropriately considered.</b>
Kāinga Ora Homes and Communities (S561)	S561.038	Natural hazards	NH-P7	Support	This policy supports rules to address Coastal Hazard risk management and is supported.	Retain NH-P7 as notified.
Bentzen Farm Limited (S167)	S167.008	Natural hazards	NH-P9	Oppose	The policy on wildfire protection should be targeted towards vulnerable activities only, consistent with the methods that implement the policy (ie rules NH-R5 and NH-R6).	Amend Policy NH-P9 as follows: Manage land use and subdivision that may be susceptible to wildfire risk by requiring <b>the following for vulnerable activities:</b> a. setbacks from any contiguous

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						scrub or shrubland, woodlot or forestry; b. access for emergency vehicles; and c. sufficient accessible water supply for firefighting purposes
<b>Setar Thirty Six Limited (S168)</b>	S168.015	Natural hazards	NH-P9	Oppose	The policy on wildfire protection should be targeted towards vulnerable activities only, consistent with the methods that implement the policy (i.e. rules NH-R5 and NH-R6)	Amend Policy NH-P9 as follows: Manage land use and subdivision that may be susceptible to wildfire risk by requiring <b>the following for vulnerable activities:</b> a. setbacks from any contiguous scrub or shrubland, woodlot or forestry; b. access for emergency vehicles; and c. sufficient accessible water supply for firefighting purposes
<b>The Shooting Box Limited (S187)</b>	S187.008	Natural hazards	NH-P9	Oppose	The policy on wildfire protection should be targeted towards vulnerable activities only, consistent with the methods that implement the policy (ie rules NH-R5 and NH-R6).	Amend Policy NH-P9 as follows: Manage land use and subdivision that may be susceptible to wildfire risk by requiring <b>the following for vulnerable activities:</b> a. setbacks from any contiguous scrub or shrubland, <b>woodlot or forestry;</b> b. <b>access for emergency vehicles; and</b> c. sufficient accessible water supply for firefighting purposes

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<b>Wendover Two Limited (S222)</b>	S222.007	Natural hazards	NH-P9	Oppose	The policy on wildfire protection should be targeted towards vulnerable activities only, consistent with the methods that implement the policy (ie rules NH-R5 and NH-R6).	Amend Policy NH-P9 as follows: Manage land use and subdivision that may be susceptible to wildfire risk by requiring <b>the following for vulnerable activities:</b> a. setbacks from any contiguous scrub or shrubland, woodlot or forestry; b. access for emergency vehicles; and c. sufficient accessible water supply for firefighting purposes
<b>Matauri Trustee Limited (S243)</b>	S243.017	Natural hazards	NH-P9	Oppose	The policy on wildfire protection should be targeted towards vulnerable activities only, consistent with the methods that implement the policy (i.e. rules NH-R5 and NH-R6).	Amend Policy NH-P9 as follows: Manage land use and subdivision that may be susceptible to wildfire risk by requiring <del>the following for</del> <b>vulnerable activities:</b> a. setbacks from any contiguous scrub or shrubland, woodlot or forestry; b. access for emergency vehicles; and c. sufficient accessible water supply for firefighting purposes
<b>P S Yates Family Trust (S333)</b>	S333.008	Natural hazards	NH-P9	Support in part	The policy on wildfire protection should be targeted towards vulnerable activities only, consistent with the methods that implement the policy (ie rules NH-R5 and NH-R6).	Amend Policy NH-P9 as follows: Manage land use and subdivision that may be susceptible to wildfire risk by requiring <b>the following for vulnerable activities:</b> a. setbacks from any contiguous scrub or shrubland, woodlot or forestry; b. access for emergency vehicles;

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						and c. sufficient accessible water supply for firefighting purposes
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.045	Natural hazards	NH-P10	Support	not stated	Retain NH-P10 as notified
<b>Top Energy Limited (S483)</b>	S483.111	Natural hazards	NH-P10	Support	Top Energy supports this policy but notes that 'minor upgrade' is not a term defined in the Proposed Plan, and considers that this term should be removed from the policy and the threshold in the chapter relied on instead to establish what scale is deemed appropriate.	Amend Policy NH-P10 as follows: Provide for the operation, maintenance, and <del>minor</del> upgrading of existing infrastructure in identified natural hazard areas.
<b>Kāinga Ora Homes and Communities (S561)</b>	S561.039	Natural hazards	NH-P10	Support	This policy is consistent with objective NH-O3 and provides the framework for rules to enable necessary infrastructure while balancing this need with the risk of natural hazards.	Retain NH-P10 as notified.
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.046	Natural hazards	NH-P11	Support	not stated	Retain NH-P11 as notified
<b>Transpower New Zealand Ltd (S454)</b>	S454.072	Natural hazards	NH-P11	Support	Transpower supports the inclusion of NH-P11 (inferred) in the FNPDP.	Retain NH-P11 (inferred)
<b>Top Energy Limited (S483)</b>	S483.112	Natural hazards	NH-P11	Support	Top Energy supports this policy	Retain Policy NH-P11
<b>Kāinga Ora Homes and Communities (S561)</b>	S561.040	Natural hazards	NH-P11	Support	This policy is consistent with objective NH-O3 as discussed above.	Retain NH-P11 as notified.
<b>Director-General of Conservation (Department of Conservation) (S364)</b>	S364.029	Natural hazards	NH-P12	Support	The Director-General supports Policy NH-P12	Retain Policy NH-P12

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<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.047	Natural hazards	NH-P13	Support	not stated	Retain NH-P13 as notified
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.030	Natural hazards	NH-P13	Support	The Director-General supports Policy NH-P13 as it gives effect to Policy 25 of the NZCPS which seeks to discourage hard protection surfaces and promote the use of alternatives (including natural defences).	Retain Policy NH-P13
<b>Kāinga Ora Homes and Communities (S561)</b>	S561.041	Natural hazards	NH-P13	Support	Kāinga Ora supports the use of natural systems and features to protect from natural hazards where practicable over hard protection structures.	Retain NH-P13 as notified.
<b>Kāinga Ora Homes and Communities (S561)</b>	S561.042	Natural hazards	NH-P14	Support	This policy is supported as it will provide for necessary ongoing maintenance and upgrading of flood management schemes.	Retain NH-P14 as notified.
<b>Lynley Newport (S93)</b>	S93.013	Natural hazards	Rules	Support in part	Support the need to manage development within coastal hazard areas but believe all hazard provisions should be located in the Natural Hazards chapter. A cross reference in the Coastal Environment back to the Natural hazards chapter can be included.	Transfer the rules from the Coastal Environment chapter (rules section addressing coastal hazards) into the Natural Hazards chapter. Consequently, insert a cross reference within the Coastal Environment chapter to this effect.
<b>Haigh Workman Limited (S215)</b>	S215.024	Natural hazards	Rules	Support	There are two sides to managing - avoiding or controlling land use and subdivision in areas of identified natural hazard risk (including increased risks resulting from climate change); - avoiding or controlling activities that may cause or exacerbate a natural hazard on another property. the risk posed by natural hazards: These are addressed by objectives and policies in the Regional Policy Statement and District Plan, and rules in the District and Regional Plans. The Natural Hazard section of the District Plan controls buildings and access routes within natural hazard areas, addressing the first bullet point. The	Retain controls on buildings and access routes in natural hazard areas

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					Subdivision rules control subdivision within Natural Hazard areas. For completeness, the Natural Hazards section should also refer to rules for earthworks and stormwater management elsewhere in the District and Regional Plans that control activities that may cause or exacerbate a natural hazard on another property	
<b>McDonalds Restaurants NZ Limited (S385)</b>	S385.016	Natural hazards	Rules	Not Stated	McDonald's understand the importance of ensuring community safety when it comes to natural hazards. However, McDonald's considers that appropriate consideration needs to be given to existing development in both the 1 in 100 and 1 in 10 River Flood Hazard Areas.	Amend Natural Hazards chapter to provide more flexibility to additions and alterations of an appropriate scale for existing infrastructure within River Flood Hazard areas.
<b>Kapiro Residents Association (S428)</b>	S428.005	Natural hazards	Rules	Support in part	<p>Inland flooding: Climate change is expected to make Northland drier overall, however heavy downpours are likely to become more extreme. This will increase the risk of inland flooding in areas near rivers/waterways. Flooding and rising groundwater are likely to affect houses, domestic wastewater tanks and disposal fields, roads and access ways to houses, and other structures built on former flood plains or land that has been drained.</p> <p>Coastal inundation: The average global sea level is expected to continue rising for several centuries in future as a result of long-lived emissions from past decades alone (irrespective of sea level rise due to future emissions). A report by the Parliamentary Commissioner for the Environment in 2015 estimated that 1 in 100-year high water level events would occur very frequently in future - for example, every 4 years at the port of Auckland and once a year at Wellington and Christchurch ports. Furthermore, storm surges can add several tens of centimetres to high tides.</p>	Amend the PDP to include stronger rules, including 'no build' areas, to prevent new buildings, wastewater systems, accessways, roads and other infrastructure in areas that are likely to be impacted by sea level rise, storm surges, flooding.



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<b>Kapiro Conservation Trust (S443)</b>	S443.005	Natural hazards	Rules	Support in part	<p>Inland flooding: Climate change is expected to make Northland drier overall, however heavy downpours are likely to become more extreme. This will increase the risk of inland flooding in areas near rivers/waterways. Flooding and rising groundwater are likely to affect houses, domestic wastewater tanks and disposal fields, roads and access ways to houses, and other structures built on former flood plains or land that has been drained.</p> <p>Coastal inundation: The average global sea level is expected to continue rising for several centuries in future as a result of long-lived emissions from past decades alone (irrespective of sea level rise due to future emissions). A report by the Parliamentary Commissioner for the Environment in 2015 estimated that 1 in 100-year high water level events would occur very frequently in future - for example, every 4 years at the port of Auckland and once a year at Wellington and Christchurch ports. Furthermore, storm surges can add several tens of centimetres to high tides.</p>	Amend the PDP to include stronger rules, including 'no build' areas, to prevent new buildings, wastewater systems, accessways, roads and other infrastructure in areas that are likely to be impacted by sea level rise, storm surges, flooding.
<b>Debbie and Chris Fewtrell (S480)</b>	S480.001	Natural hazards	Rules	Oppose	The PDP nor any of its supporting documents refer to Section 10 or Section 20 of the RMA (as they relate to existing use rights).	Amend to enable, as a permitted activity, the ability for people to exercise their existing use rights, where rebuilding a house 'like for like' and which result in effects which are the same or similar in character, intensity, and scale.
<b>James Phillips (S484)</b>	S484.001	Natural hazards	Rules	Support in part	The PDP nor any of its supporting documents refer to Section 10 or Section 20 of the RMA as they relate to existing use rights. A provision should therefore be provided to allow for people to exercise their existing use rights.	Insert an additional permitted activity provision which allows for development of a house, building or activity in accordance with Section 10 of the RMA where effects are the same or similar in character, intensity and scale despite the application of a hazard overlay.

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<b>Ngā Tai Ora - Public Health Northland (S516)</b>	S516.045	Natural hazards	Rules	Not Stated	Ngā Tai Ora support the creation of resilient communities, responding to and managing risk from natural hazards to ensure the health, safety and wellbeing of Northland residents. Ngā Tai Ora is generally supportive of the Natural Hazards chapter to the extent that they give effect to the Northland Regional Policy Statement and take into account the long-term effects of climate change, including the influence of climate change on people. The PDP must acknowledge and minimise the risks and impacts of natural hazards, including the influence of climate change, on people, property and infrastructure, consistent with objective 3.13 Natural hazard risk of the Northland Regional Policy Statement.	Amend Natural Hazards objectives, policies and rules to appropriately give effect to the Northland Regional Policy Statement which seeks to manage subdivision, use and development to minimise the risk from natural hazards.
<b>Ngā Tai Ora - Public Health Northland (S516)</b>	S516.046	Natural hazards	Rules	Not Stated	Ngā Tai Ora support the creation of resilient communities, responding to and managing risk from natural hazards to ensure the health, safety and wellbeing of Northland residents. Policy NH-P8 seeks to avoid the use of land that is susceptible to land instability, without any rule to give effect to this policy. Ngā Tai Ora consider this to be a significant gap in the Natural Hazards chapter and could lead to risk to people and property.	Amend the Natural Hazards chapter to include appropriate rules to give effect to Policy NH-P8.
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S521)</b>	S521.005	Natural hazards	Rules	Support in part	Inland flooding: Climate change is expected to make Northland drier overall, however heavy downpours are likely to become more extreme. This will increase the risk of inland flooding in areas near rivers/waterways. Flooding and rising groundwater are likely to affect houses, domestic wastewater tanks and disposal fields, roads and access ways to houses, and other structures built on former flood plains or land that has been drained.	Amend the PDP to include stronger rules, including 'no build' areas, to prevent new buildings, wastewater systems, accessways, roads and other infrastructure in areas that are likely to be impacted by sea level rise, storm surges, flooding.

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					Coastal inundation: The average global sea level is expected to continue rising for several centuries in future as a result of long-lived emissions from past decades alone (irrespective of sea level rise due to future emissions). A report by the Parliamentary Commissioner for the Environment in 2015 estimated that 1 in 100-year high water level events would occur very frequently in future - for example, every 4 years at the port of Auckland and once a year at Wellington and Christchurch ports. Furthermore, storm surges can add several tens of centimetres to high tides.	
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S521)</b>	S521.012	Natural hazards	Rules	Support in part	The PDP should require all new buildings to store/use roof water wherever possible, to avoid the need for expensive reticulation systems and reduce the need for water top-ups via water tankers. New buildings connected to a public water supply should be required to collect roof water in storage vessels to use for gardens and flushing toilets (at minimum) and contribute to other household water uses such as laundry connections. Water storage vessels do not need to be a traditional round tank - other useful shapes exist, such as rectangular upright vessels that are easy to install against the side of a house or garage, or short flat vessels designed to be completely buried underground or placed under the foundations of new builds. Greywater harvesting and re-use should also be required for new buildings. These types of water-saving measures would also reduce future Council infrastructure costs for additional water supplies and wastewater.	Amend PDP to require best practice water-sensitive, low-impact designs and measures for all stormwater and wastewater engineering, infrastructure and related development, to prevent problems associated with more extreme rainfall events in future, including provision to implement relevant parts of NPS-
<b>Carbon Neutral NZ Trust (S529)</b>	S529.051	Natural hazards	Rules	Support in part	Inland flooding: Climate change is expected to make Northland drier overall, however heavy downpours are likely to become more extreme. This will increase the risk of inland	Amend the PDP to include stronger rules, including 'no build' areas, to prevent new buildings, wastewater systems, accessways, roads and

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					<p>flooding in areas near rivers/waterways. Flooding and rising groundwater are likely to affect houses, domestic wastewater tanks and disposal fields, roads and access ways to houses, and other structures built on former flood plains or land that has been drained.</p> <p>Coastal inundation: The average global sea level is expected to continue rising for several centuries in future as a result of long-lived emissions from past decades alone (irrespective of sea level rise due to future emissions). A report by the Parliamentary Commissioner for the Environment in 2015 estimated that 1 in 100-year high water level events would occur very frequently in future - for example, every 4 years at the port of Auckland and once a year at Wellington and Christchurch ports. Furthermore, storm surges can add several tens of centimetres to high tides</p>	<p>other infrastructure in areas that are likely to be impacted by sea level rise, storm surges, flooding.</p>
<p><b>Carbon Neutral NZ Trust (S529)</b></p>	<p>S529.239</p>	<p>Natural hazards</p>	<p>Rules</p>	<p>Not Stated</p>	<p>Stormwater and wastewater should be fully managed to avoid sediment/pollutants being carried to waterways and wetlands, especially during high rainfall events which are expected to become more extreme due to climate change. Under s7(i) of the RMA, councils must have particular regard to the effects of climate change.</p> <p>In general, water sensitive and low impact designs should be a standard requirement, not just encouraged. For example, stormwater and water from wastewater disposal fields can carry pollutants and silt into waterways during high rainfall events. They should not be discharged directly into waterways but be retained in constructed wetlands (vegetated retention ponds) or other water sensitive and low impacts features.</p>	<p>Amend the plan so that water sensitive and low impact designs are a standard requirement</p>

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<b>Bentzen Farm Limited (S167)</b>	S167.009	Natural hazards	Notes	Oppose	Note 2 to the rule applies the requirement for a report prepared by a suitably qualified and experienced engineer/instability assessment to activities and subdivision on the site as a whole, rather than just that part impacted by the identified natural hazard, imposing unnecessary cost. The amendments sought target the requirements just to the mapped hazard area.	Amend note 2 as follows 2. Any application for a land use resource consent in relation to a <b>site location</b> that is potentially affected by natural hazards must be accompanied by a report prepared by a suitably qualified and experienced engineer that addresses the matters identified in the relevant objectives, policies, performance standards and matters of control/discretion. Any application for a subdivision consent must additionally include an assessment of whether <del>the</del> <b>any new site</b> to be created includes an area of land susceptible to instability.
<b>Setar Thirty Six Limited (S168)</b>	S168.016	Natural hazards	Notes	Oppose	Note 2 to the rules applies the requirement for a report prepared by a suitably qualified and experienced engineer/instability assessment to activities and subdivision on the site as a whole, rather than just that part impacted by the identified natural hazard, imposing unnecessary cost. The amendments sought target the requirements just to the mapped hazard area.	Amend note 2 as follows: 2. Any application for a land use resource consent in relation to a <b>site location</b> that is potentially affected by natural hazards must be accompanied by a report prepared by a suitably qualified and experienced engineer that addresses the matters identified in the relevant objectives, policies, performance standards and matters of control/discretion. Any application for a subdivision consent must additionally include

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						an assessment of whether <del>the site</del> <b>any new site to be created</b> includes an area of land susceptible to instability
<b>The Shooting Box Limited (S187)</b>	S187.009	Natural hazards	Notes	Oppose	Note 2 to the rule applies the requirement for a report prepared by a suitably qualified and experienced engineer/instability assessment to activities and subdivision on the site as a whole, rather than just that part impacted by the identified natural hazard, imposing unnecessary cost. The amendments sought target the requirements just to the mapped hazard area.	Amend note 2 as follows: 2. Any application for a land use resource consent in relation to a <del>site</del> <b>location</b> that is potentially affected by natural hazards must be accompanied by a report prepared by a suitably qualified and experienced engineer that addresses the matters identified in the relevant objectives, policies, performance standards and matters of control/discretion. Any application for a subdivision consent must additionally include an assessment of whether <del>the site</del> <b>any new site to be created</b> includes an area of land susceptible to instability.
<b>Haigh Workman Limited (S215)</b>	S215.025	Natural hazards	Notes	Not Stated	For completeness, the Natural Hazards section should also refer to rules for earthworks and stormwater management elsewhere in the District and Regional Plans that control activities that may cause or exacerbate a natural hazard on another property	Insert reference to rules for earthworks and stormwater management elsewhere in the District and Regional Plans that control activities that may cause or exacerbate a natural hazard on another property
<b>Wendover Two Limited (S222)</b>	S222.008	Natural hazards	Notes	Support in part	Note 2 to the rule applies the requirement for a report prepared by a suitably qualified and experienced engineer/instability assessment to activities and subdivision on the site as a whole, rather than just that part impacted by	Amend note 2 as follows: 2. any application for a land use resource consent in relation to a <del>site</del> <b>location</b> that is potentially

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					<p>the identified natural hazard, imposing unnecessary cost. The amendments sought target the requirements just to the mapped hazard area.</p>	<p>affected by natural hazards must be accompanied by a report prepared by a suitably qualified and experienced engineer that addresses the matters identified in the relevant objectives, policies, performance standards and matters of control/discretion. Any application for a subdivision consent must additionally include an assessment of whether <del>the site</del> <b>any new site to be created</b> includes an area of land susceptible to instability.</p>
<p><b>Matauri Trustee Limited (S243)</b></p>	<p>S243.018</p>	<p>Natural hazards</p>	<p>Notes</p>	<p>Oppose</p>	<p>Note 2 to the rule applies the requirement for a report prepared by a suitably qualified and experienced engineer/instability assessment to activities and subdivision on the site as a whole, rather than just that part impacted by the identified natural hazard, imposing unnecessary cost. The amendments sought target the requirements just to the mapped hazard area.</p>	<p>Amend note 2 as follows                  2. Any application for a land use resource consent in relation to a <b>site location</b> that is potentially affected by natural hazards must be accompanied by a report prepared by a suitably qualified and experienced engineer that addresses the matters identified in the relevant objectives, policies, performance standards and matters of control/discretion. Any application for a subdivision consent must additionally include an assessment of whether <del>the site</del> <b>any new site to be created</b> includes an area of land</p>

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						susceptible to instability.
<b>P S Yates Family Trust (S333)</b>	S333.009	Natural hazards	Notes	Support in part	Note 2 to the rule applies the requirement for a report prepared by a suitably qualified and experienced engineer/instability assessment to activities and subdivision on the site as a whole, rather than just that part impacted by the identified natural hazard, imposing unnecessary cost. The amendments sought target the requirements just to the mapped hazard area.	Amend note 2 as follows 2. Any application for a land use resource consent in relation to a <del>site</del> <b>location</b> that is potentially affected by natural hazards must be accompanied by a report prepared by a suitably qualified and experienced engineer that addresses the matters identified in the relevant objectives, policies, performance standards and matters of control/discretion. Any application for a subdivision consent must additionally include an assessment of whether <del>the site</del> <b>any new site to be created</b> includes an area of land susceptible to instability.
<b>Kāinga Ora Homes and Communities (S561)</b>	S561.043	Natural hazards	Notes	Oppose	Under the Rules heading, Note 2 repeats the same comments under Standard NH-S1. Recommend deleting Note 2 from this section.	Delete Note 2 from under Rules headings and amend as follows: Notes: 1. There may be rules in other District-Wide Matters and the underlying zone in Part 3 - Area Specific Matters that apply to a proposed activity, in addition to the rules in this chapter. These other rules may be more stringent than the rules in this chapter. Ensure that the underlying zone chapter and other relevant District- Wide Matters chapters are also referred to, in addition to this chapter, to determine whether resource consent is required



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						<p>under other rules in the District Plan. Refer to the how the plan works chapter to determine the activity status of a proposed activity where resource consent is required under multiple rules.<del>2. Any application for a land use resource consent in relation to a site that is potentially affected by natural hazards must be accompanied by a report prepared by a suitably qualified and experienced engineer that addresses the matters identified in the relevant objectives, policies, performance standards and matters of control/discretion. Any application for a subdivision consent must additionally include an assessment of whether the site includes an area of land susceptible to instability.</del><b>3. 2.</b> Coastal hazard rules are located in the Coastal Environment Chapter.</p>
<p><b>Waka Kotahi NZ Transport Agency (S356)</b></p>	<p>S356.048</p>	<p>Natural hazards</p>	<p>NH-R1</p>	<p>Support</p>	<p>not stated</p>	<p>Retain NH-R1 as notified</p>
<p><b>Northland Federated Farmers of New Zealand (S421)</b></p>	<p>S421.069</p>	<p>Natural hazards</p>	<p>NH-R1</p>	<p>Support</p>	<p>Federated Farmers supports the inclusion of rules NH-R1, NH-2, NH-3, NH-5, NH-6, NH-7, NH-8, and NH-9 as currently worded in the proposed district plan.</p>	<p>Retain Rule NH-R1 or ensure that amendments include similar wording that achieves the same intent</p>

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Transpower New Zealand Ltd (S454)	S454.073	Natural hazards	NH-R1	Support	Transpower supports the inclusion of NH-R1 in the FNPDP.	Retain NH-R1
Top Energy Limited (S483)	S483.113	Natural hazards	NH-R1	Not Stated	It is unclear to Top Energy how maintenance, repair or upgrade of infrastructure in a 1 in 10 year River Flood Hazard and it assumed that this would default to discretionary activity. Top Energy seek that this be provided for as a permitted activity where there is not increase to footprint	Amend Rule NH-R1 as indicated below to provide for maintenance, repair or upgrading of infrastructure in 1 in 10 year floods as indicated in submission.
Top Energy Limited (S483)	S483.114	Natural hazards	NH-R1	Not Stated	While Top Energy appreciates the risk caused by natural hazards, it is considered that PER -1 (which requires no increase in above ground footprint) is overly restrictive for the 1 in 100 year River Flood Hazard Areas and will require unnecessary resource consent applications. As currently written, the rule does not adequately 'provide for' upgrades (even to a minor degree) as is rightfully directed in NH-P10. Further, for above ground infrastructure, it is more restrictive than NH-R2 and NH-R3 (2) which relate to buildings and structures generally e.g. no enablement in acknowledgment of the importance of infrastructure.	Amend Rule NH-R1 as follows (or the same effect): NH-R1 Maintenance repair, or upgrading of infrastructure, including structural mitigation assets 1 in 100 Year River Flood Hazard Areas <b>1 in 10 year River Flood Hazard Areas</b> Activity status: Permitted Where: PER-1 <b>The works are located in a 1 in 10 Year River Flood hazard area</b> 1. There is no increase to the footprint of any above ground infrastructure; and <b>2. Any works to maintain, repair or upgrade infrastructure do not alter or divert an overland flow path; and</b> <b>3. Ground is reinstated to the equivalent state that existed prior to the works</b> PER-2 <b>The works are located in a 1 in 100 Year River Flood hazard area</b> <b>1. Any works to maintain,</b>

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						<p><b>repair or upgrade infrastructure do not result in an increase of footprint or GFA by more than 10m<sup>2</sup>; and</b></p> <p>2. Any works to maintain, repair or upgrade infrastructure do not alter or divert an overland flow path; and</p> <p><b>3. Ground is reinstated to the same ground level that existed prior to the works.</b></p> <p><del>PER-3 Ground is reinstated to the equivalent state that existed prior to the works</del></p>
<b>Willowridge Developments Limited (S250)</b>	S250.003	Natural hazards	NH-R2	Not Stated	Existing activities and buildings should be recognised and provided for. The default performance standard of no increase in GFA or footprint of structures is overly restrictive and will require unnecessary resource consent applications.	Amend NH-R2 to provide for additions and alterations to existing activities as a permitted activity.
<b>Te Hiku Community Board (S257)</b>	S257.021	Natural hazards	NH-R2	Oppose	Do not support the new flood zone landuse rules and instead seek more flexibility in these rules to allow large extensions for modifications to existing buildings. The rule NH-R2 should provide for flood risks to be addressed through alternative building designs, not just by limiting building GFA or footprint. NH-R2 does not implement policy NH-P6, which allows for mitigation of hazards through building design.	Amend NH-R2 PER-1 to allow building extensions and alterations that increase GFA or footprint where the extension or alteration is designed so that it will not impede flood flows.
<b>BP Oil New Zealand Limited, Mobil Oil New Zealand Limited, Z Energy</b>	S335.025	Natural hazards	NH-R2	Support	Support the intent of the provisions in the Natural Hazards and seek that they are retained as drafted. They enable alterations to existing buildings and structures and new minor buildings and structures in flood hazard areas subject to performance standards.	Retain Rule NH-R2 as notified

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<b>Limited (S335)</b>						
<b>Te Aupōuri Commercial Development Ltd (S339)</b>	S339.022	Natural hazards	NH-R2	Not Stated	TACDL's sites of interest listed in Figure 1 - 4 of the submission are subject to Flood hazards. TACDL considers that existing activities and buildings should be recognised and provided for. Further, TACDL consider that the default performance standard of no increase in GFA or footprint of structures, is overly restrictive and will require unnecessary resource consent applications.	Amend NH-R2 to provide for additional and alterations to existing activities as a permitted activity.
<b>Waipapa Pine Limited and Adrian Broughton Trust (S342)</b>	S342.007	Natural hazards	NH-R2	Oppose	Both rules centre on the potential effect of a structure in terms of diverting or altering overland flows or reducing flood plain storage. This involves a design solution which can be assessed at the time of a Building Consent. This falls within the same context as Council requiring an earthquake report at the Building Consent stage. The threshold should be removed, and the rule be amended to allow the presentation of a report at the time of the Building Consent application. This is reflected in Rule NH-S1.	delete in relation to 10m2 threshold (inferred)
<b>Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd (S344)</b>	S344.010	Natural hazards	NH-R2	Not Stated	The default performance standard of no increase in GFA or footprint of structures is overly restrictive and will require unnecessary resource consent applications.	Amend NH-R2 to provide for additional and alterations to existing activities as a permitted activity.
<b>Wakaiti Dalton (S355)</b>	S355.015	Natural hazards	NH-R2	Support in part	Part of our site is partially subject to flood hazard, and while we do not have any buildings located in this area, we have concerns regarding the approach taken to this hazard. Whirinaki area is subject to flood	Amend NH-R2 to provide for additional and alterations to existing activities as a permitted activity.

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					hazard with many number of the existing dwellings located in areas susceptible to flooding. In our view, it is considered that existing activities and buildings should be recognised and provided for. Further, it is considered that the default performance standard of no increase in GFA or footprint of structures, is overly restrictive and will require unnecessary resource consent applications.	
<b>Sean Frieling (S357)</b>	S357.022	Natural hazards	NH-R2	Oppose	<p>We do not support the new flood zone landuse rules and instead seek more flexibility in these rules to allow large extensions for modifications to existing buildings. The rule NH-R2 should provide for flood risks to be addressed through alternative building designs, not just by limiting building GFA or footprint. NH-R2 does not implement policy NH-P6, which allows for mitigation of hazards through building design.</p> <p>We do not support the new flood zone landuse rules and instead seek more flexibility in these rules to allow large decks, for modifications to existing buildings". The rule should provide for flood risks to be addressed through alternative building designs, not just by limiting deck area and height. NH-R3 PER 1 does not fully implement policy NH-P6, which allows for mitigation of hazards through building design.</p>	Amend NH-R2 PER-1 to allow building extensions and alterations that increase GFA or footprint where the extension or alteration is designed so that it will not impede flood flows.
<b>Leah Frieling (S358)</b>	S358.022	Natural hazards	NH-R2	Oppose	We do not support the new flood zone landuse rules and instead seek more flexibility in these rules to allow large extensions for modifications to existing buildings. The rule NH-R2 should provide for flood risks to be addressed through alternative building designs, not just by limiting building GFA or footprint. NH-R2 does not implement policy NH-P6, which	Amend PER-1 of Rule NH-R2 to allow building extensions and alterations that increase GFA or footprint where the extension or alteration is designed so that it will not impede flood flows.

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					allows for mitigation of hazards through building design	
<b>Foodstuffs North Island Limited (S363)</b>	S363.012	Natural hazards	NH-R2	Not Stated	The considers that rule NH-R2 Extensions and alterations to existing buildings or structures, that existing activities and buildings should be recognised and provided for. and that the default performance standard of no increase in GFA or footprint of structures, is overly restrictive and will require unnecessary resource consent applications.	Amend rule NH-R2 Extensions and alterations to existing buildings or structures, to provide for additions and alterations to existing activities as a permitted activity in the 1 in 10 and 1 in 100 River Flood Hazard Area.
<b>McDonalds Restaurants NZ Limited (S385)</b>	S385.017	Natural hazards	NH-R2	Support in part	McDonald's Kaitaia and mapped as being within a River Flood Hazard Area. This rule provides for extensions and alterations to buildings and structures where they result in no more than a 10m2 increase to Gross Floor Area. On review of the s32 analysis for Natural Hazards, it is unclear where this threshold has come from and how they are justified, particularly when considering the allowances that have been made for other structures (e.g; 30m2 for a deck and 100m2 for a structure ancillary to farming.) McDonald's seeks that the thresholds for non-habitable buildings and structures be re-considered to enable better flexibility for extensions and alterations to existing structures in both the 1 in 100 and 1 in 10 Flood Hazard Area.	Amend NH-R3 as follows (or to same effect) Activity status: Permitted 1 in 100 Year River flood hazard area <b>1 in 10 River flood hazard area</b> Where: <b>PER-1The works are located in a 1 in 10 Year River Flood hazard area and1. there is no increase to the GFA of the building or footprint of the structure that results in the building or structure exceeding the limits for new buildings or structures in NH-R3-PER 1 and new buildings or structures ancillary to farming activities in NH-R4 PER 1.PER-22.No part of the building or structure is enclosed in a manner that alters or diverts an overland flow path or reduces flood plain storagePER-2The works are located in a 1 in 100 Year River Flood hazard area and:1.The</b>

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						<b>increase in GFA to any building or structure is no more than 100m<sup>2</sup>. No part of the building or structure is enclosed in a manner that alters or diverts an overland flow path or reduces flood plain storage</b>
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.070	Natural hazards	NH-R2	Support	Federated Farmers supports the inclusion of rules NH-R1, NH-2, NH-3, NH-5, NH-6, NH-7, NH-8, and NH-9 as currently worded in the proposed district plan.	Retain Rule NH-R2 or ensure that amendments include similar wording that achieves the same intent
<b>LJ King Ltd (S464)</b>	S464.028	Natural hazards	NH-R2	Oppose	We seek more flexibility in these rules to allow large extensions for modifications to existing buildings. The rule NH-R2 should provide for flood risks to be addressed through alternative building designs, not just by limiting building GFA or footprint. NH-R2 does not implement policy NH-P6, which allows for mitigation of hazards through building design.	Amend NH-R2 PER-1 to allow building extensions and alterations that increase GFA or footprint where the extension or alteration is designed so that it will not impede flood flows.
<b>Michael Foy (S472)</b>	S472.022	Natural hazards	NH-R2	Support in part	We do not support the new flood zone landuse rules and instead seek more flexibility in these rules to allow large extensions for modifications to existing buildings. The rule NH-R2 should provide for flood risks to be addressed through alternative building designs, not just by limiting building GFA or footprint. NH-R2 does not implement policy NH-P6, which allows for mitigation of hazards through building design	Amend NH-R2 PER-1 to allow building extensions and alterations that increase GFA or footprint where the extension or alteration is designed so that it will not impede flood flows.
<b>Elbury Holdings (S485)</b>	S485.027	Natural hazards	NH-R2	Oppose	We seek more flexibility in these rules to allow large extensions for modifications to existing buildings. The rule NH-R2 should provide for flood risks to be addressed through alternative building designs, not just by limiting building GFA or footprint. NH-R2 does not implement policy NH-P6, which	Amend NH-R2 PER-1 to allow building extensions and alterations that increase GFA or footprint where the extension or alteration is designed so that it will not impede flood flows.

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					allows for mitigation of hazards through building design.	
<b>Elbury Holdings (S519)</b>	S519.027	Natural hazards	NH-R2	Oppose	We seek more flexibility in these rules to allow large extensions for modifications to existing buildings. The rule NH-R2 should provide for flood risks to be addressed through alternative building designs, not just by limiting building GFA or footprint. NH-R2 does not implement policy NH-P6, which allows for mitigation of hazards through building design.	Amend NH-R2 PER-1 to allow building extensions and alterations that increase GFA or footprint where the extension or alteration is designed so that it will not impede flood flows.
<b>Elbury Holdings (S541)</b>	S541.024	Natural hazards	NH-R2	Oppose	We do not support the new flood zone landuse rules and instead seek more flexibility in these rules to allow large extensions for modifications to existing buildings. The rule NH-R2 should provide for flood risks to be addressed through alternative building designs, not just by limiting building GFA or footprint. NH-R2 does not implement Policy NH-P6, which allows for mitigation of hazards through building design.	Amend NH-R2 PER-1 to allow building extensions and alterations that increase GFA or footprint where the extension or alteration is designed so that it will not impede flood flows.
<b>LJ King Limited (S543)</b>	S543.026	Natural hazards	NH-R2	Oppose	We seek more flexibility in these rules to allow large extensions for modifications to existing buildings. The rule NH-R2 should provide for flood risks to be addressed through alternative building designs, not just by limiting building GFA or footprint. NH-R2 does not implement policy NH-P6, which allows for mitigation of hazards through building design	Amend NH-R2 PER-1 to allow building extensions and alterations that increase GFA or footprint where the extension or alteration is designed so that it will not impede flood flows
<b>LJ King Limited (S547)</b>	S547.026	Natural hazards	NH-R2	Oppose	We seek more flexibility in these rules to allow large extensions for modifications to existing buildings. The rule NH-R2 should provide for flood risks to be addressed through alternative building designs, not just by limiting building GFA or footprint. NH-R2 does not implement policy NH-P6, which allows for mitigation of hazards through building design	Amend NH-R2 PER-1 to allow building extensions and alterations that increase GFA or footprint where the extension or alteration is designed so that it will not impede flood flows



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<b>New Zealand Defence Force (S217)</b>	S217.021	Natural hazards	NH-R3	Support in part	TMTA may require the placement of temporary buildings and structures in flood hazard areas to enable realistic training, such as the placement of temporary bridges. It is appropriate that such structures used in military training are permitted in flood hazard areas due to their temporary nature.	Amend NH-R3 PER-1 to also permit temporary structures and buildings for TMTA as follows: PER-1 The building or structure is one of the following: 1. Above ground buildings or structures with a footprint of 10m2 or less; or 2. deck less than 30m2 and less than 1m in height; or 3. boardwalks or stairs that are less than 500mm above ground level and located within a public reserve or legal road; or <b>4. temporary building or structures associated with temporary military training activities.</b>
<b>Te Hiku Community Board (S257)</b>	S257.022	Natural hazards	NH-R3	Oppose	Do not support the new flood zone landuse rules and instead seek more flexibility in these rules to allow large decks, for modifications to existing buildings". The rule should provide for flood risks to be addressed through alternative building designs, not just by limiting deck area and height. NH-R3 PER 1 does not fully implement policy NH-P6, which allows for mitigation of hazards through building design.	Amend NH-R3 PER-1 to allow new decks more than 30m2 and more than 1m in height where the deck is designed so that it will not impede flood flows.
<b>BP Oil New Zealand Limited, Mobil Oil New Zealand Limited, Z Energy Limited (S335)</b>	S335.026	Natural hazards	NH-R3	Support	Support the intent of the provisions in the Natural Hazards and seek that they are retained as drafted. They enable alterations to existing buildings and structures and new minor buildings and structures in flood hazard areas subject to performance standards.	Retain Rule NH-R3 as notified

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<b>Waipapa Pine Limited and Adrian Broughton Trust (S342)</b>	S342.008	Natural hazards	NH-R3	Oppose	Both rules centre on the potential effect of a structure in terms of diverting or altering overland flows or reducing flood plain storage. This involves a design solution which can be assessed at the time of a Building Consent. This falls within the same context as Council requiring an earthquake report at the Building Consent stage. The threshold should be removed, and the rule be amended to allow the presentation of a report at the time of the Building Consent application. This is reflected in Rule NH-S1.	delete in relation to 10m2 threshold (inferred)
<b>Sean Frieling (S357)</b>	S357.023	Natural hazards	NH-R3	Oppose	We do not support the new flood zone landuse rules and instead seek more flexibility in these rules to allow large extensions for modifications to existing buildings. The rule NH-R2 should provide for flood risks to be addressed through alternative building designs, not just by limiting building GFA or footprint. NH-R2 does not implement policy NH-P6, which allows for mitigation of hazards through building design. We do not support the new flood zone landuse rules and instead seek more flexibility in these rules to allow large decks, for modifications to existing buildings". The rule should provide for flood risks to be addressed through alternative building designs, not just by limiting deck area and height. NH-R3 PER 1 does not fully implement policy NH-P6, which allows for mitigation of hazards through building design.	Amend NH-R3 PER-1 to allow new decks more than 30m2 and more than 1m in height where the deck is designed so that it will not impede flood flows.
<b>Leah Frieling (S358)</b>	S358.023	Natural hazards	NH-R3	Oppose	We do not support the new flood zone landuse rules and instead seek more flexibility in these rules to allow large decks,	Amend PER-1 of Rule NH-R3 to allow new decks more than 30m <sup>2</sup> and more than 1m in height where the deck is

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					for modifications to existing buildings". The rule should provide for flood risks to be addressed through alternative building designs, not just by limiting deck area and height. NH-R3 PER 1 does not fully implement policy NH-P6, which allows for mitigation of hazards through building design.	designed so that it will not impede flood flows.
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.071	Natural hazards	NH-R3	Support	Federated Farmers supports the inclusion of rules NH-R1, NH-2, NH-3, NH-5, NH-6, NH-7, NH-8, and NH-9 as currently worded in the proposed district plan.	Retain Rule NH-R3 or ensure that amendments include similar wording that achieves the same intent
<b>LJ King Ltd (S464)</b>	S464.029	Natural hazards	NH-R3	Oppose	We seek more flexibility in these rules to allow large decks, for modifications to existing buildings". The rule should provide for flood risks to be addressed through alternative building designs, not just by limiting deck area and height. NH-R3 PER 1 does not fully implement policy NH-P6, which allows for mitigation of hazards through building design.	Amend NH-R3 PER-1 to allow new decks more than 30m2 and more than 1m in height where the deck is designed so that it will not impede flood flows.
<b>Michael Foy (S472)</b>	S472.023	Natural hazards	NH-R3	Support in part	We do not support the new flood zone landuse rules and instead seek more flexibility in these rules to allow large decks, for modifications to existing buildings". The rule should provide for flood risks to be addressed through alternative building designs, not just by limiting deck area and height. NH-R3 PER 1 does not fully implement policy NH-P6, which allows for mitigation of hazards through building design	Amend NH-R3 PER-1 to allow new decks more than 30m2 and more than 1m in height where the deck is designed so that it will not impede flood flows.
<b>Top Energy Limited (S483)</b>	S483.115	Natural hazards	NH-R3	Oppose	This rule should include a provision for new network utilities that is more enabling than PER-1, noting that infrastructure is not habitable. Top Energy seeks that all new underground structures be permitted, and that above ground infrastructure of an appropriate scale is provided for in acknowledgment of the critical importance of this infrastructure and that it is not habitable.	Insert a new permitted rule for new infrastructure in the 1 in 100 Year Flood hazard zone as follows (or to the same effect): <b>NH-RX New network utilities1 in 100 Year River Flood hazard areasActivity status permittedWhere :PER-1Any building or structure</b>

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					<p>Top Energy highlight that NH-R4 provides for structures ancillary to farming of up to 100m<sup>2</sup> in area with no height threshold and seek similar enablement for new network utilities</p>	<p><b>associated with the new network utility is one of the following:1.Underground; or2.Has a footprint that is less than 100m<sup>2</sup>:PER -2Any building or structure associated with the new network utility is not located within or does not alter or divert an overland flow path.Activity status where compliance with PER -1 and PER 2 is not achieved: Restricted DiscretionaryMatters of discretion are restricted to:a. the effects of flood hazards on the integrity of the building or structure to the extent that such effects are not appropriately managed by the building consent process under the Building Act 2004;b. the effects of the building or structure on overland flow paths and flooding on surrounding sites; andc. the extent to which the risk to people and property from the flood hazard is avoided or managed.</b></p>
<p><b>Elbury Holdings (S485)</b></p>	<p>S485.028</p>	<p>Natural hazards</p>	<p>NH-R3</p>	<p>Oppose</p>	<p>We seek more flexibility in these rules to allow large decks, for modifications to existing buildings". The rule should provide for flood risks to be addressed through alternative building designs, not just by</p>	<p>Amend NH-R3 PER-1 to allow new decks more than 30m<sup>2</sup> and more than 1m in height where the deck is designed so that it will not impede</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					limiting deck area and height. NH-R3 PER 1 does not fully implement policy NH-P6, which allows for mitigation of hazards through building design.	flood flows.
<b>Elbury Holdings (S519)</b>	S519.028	Natural hazards	NH-R3	Oppose	We seek more flexibility in these rules to allow large decks, for modifications to existing buildings". The rule should provide for flood risks to be addressed through alternative building designs, not just by limiting deck area and height. NH-R3 PER 1 does not fully implement policy NH-P6, which allows for mitigation of hazards through building design.	Amend NH-R3 PER-1 to allow new decks more than 30m2 and more than 1m in height where the deck is designed so that it will not impede flood flows.
<b>Elbury Holdings (S541)</b>	S541.025	Natural hazards	NH-R3	Oppose	We do not support the new flood zone landuse rules and instead seek more flexibility in these rules to allow large decks, for modifications to existing buildings". The Rule (NH-R3) should provide for flood risks to be addressed through alternative building designs, not just by limiting deck area and height. NH-R3 PER 1 does not fully implement policy NH-P6, which allows for mitigation of hazards through building design.	Amend NH-R3 PER-1 to allow new decks more than 30m2 and more than 1m in height where the deck is designed so that it will not impede flood flows.
<b>LJ King Limited (S543)</b>	S543.027	Natural hazards	NH-R3	Oppose	We seek more flexibility in these rules to allow large decks, for modifications to existing buildings". The rule should provide for flood risks to be addressed through alternative building designs, not just by limiting deck area and height. NH-R3 PER 1 does not fully implement policy NH-P6, which allows for mitigation of hazards through building design	Amend NH-R3 PER-1 to allow new decks more than 30m2 and more than 1m in height where the deck is designed so that it will not impede flood flows
<b>LJ King Limited (S547)</b>	S547.027	Natural hazards	NH-R3	Oppose	We seek more flexibility in these rules to allow large decks, for modifications to existing buildings". The rule should provide for flood risks to be addressed through alternative building designs, not just by limiting deck area and height. NH-R3 PER 1 does not fully implement policy NH-P6, which allows for mitigation of hazards through building design	Amend NH-R3 PER-1 to allow new decks more than 30m2 and more than 1m in height where the deck is designed so that it will not impede flood flows

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Horticulture New Zealand (S159)</b>	S159.043	Natural hazards	NH-R4	Oppose	Artificial crop protection structures and crop support structures should be provided for within Rule NH-R4 as they are open structures which water can flow through	Amend Rule NH-R4 to include: <b>PER-4Artificial crop protection structures and crop support structures</b>
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.077	Natural hazards	NH-R4	Support in part	Federated Farmers supports the new buildings or structures (excluding residential activities) ancillary to farming buildings being classified as permitted activities. It is noted that the footprint is limited to less than 100m <sup>2</sup> which is small for an ancillary building. It would be more appropriate to increase the size of the footprint to 250m <sup>2</sup> which is the average size required for ancillary buildings such as hay barns.	Amend PER-1 of Rule NH-R4 to increase the threshold as follows: The building or structure has a footprint that is less than <del>100m<sup>2</sup></del> <b>250m<sup>2</sup></b> .
<b>Lynley Newport (S95)</b>	S95.001	Natural hazards	NH-R5	Oppose	Surprised that the Council has considered it necessary to persist with a rule such as NH-R5 PER-2. The same rule in the Operative District Plan has not served any useful purpose, the issue being much better addressed through the Building Consent process and FENZ standards and guidelines, and is often in conflict with rules restricting the clearance of indigenous vegetation. In fact the proposed new wording is even worse than the existing wording in the Operative District Plan because it deletes the words "area of" and simply states contiguous scrub or shrubland, woodlot or forestry - meaning a single row of shelter planting is likely caught by the rule. Imposing a specific buffer distance is a nonsense. A fire is not going to follow the rule and know not to spread when the gap between building and dripline is 20.Sm, compared with spreading if the distance is 19.Sm. The emphasis should be on sensible and practical provision of the means by which fires can be extinguished - safe, sufficient and accessible water supply - and by providing homeowners with useful and practical advice in regard to plant	Delete Rule NH-R5 PER-2.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					species and building materials that might be suitable when building near or within areas of vegetation.	
<b>Bentzen Farm Limited (S167)</b>	S167.010	Natural hazards	NH-R5	Oppose	Non-conformity with the rule should be a restricted discretionary activity, rather than full discretionary, as the matters managed by the rule are confined to the single issue of fire risk. The matters of discretion sought to be added by this submission will appropriately direct decision making.	Amend the activity status in Rule NH-R5 where compliance is not achieved with PER-1 or PER-1 from Discretionary to Restricted Discretionary Activity. Add the following matters of discretion: a. The availability of water for fire-fighting; b. The scale of the extension or alteration; c. Alternative options for the location of the extension or alteration; d. The use of building materials to reduce fire risk; e. The extent and type of vegetation present and f. The nature and density of any planting to reduce fire risk, including use of low flammability species.
<b>Setar Thirty Six Limited (S168)</b>	S168.017	Natural hazards	NH-R5	Oppose	Non-conformity with the rule should be a restricted discretionary activity, rather than full discretionary, as the matters managed by the rule are confined to the single issue of fire risk. There are circumstances where the rule cannot be met, and indeed such an outcome could be a compromise compared to wider landscape and biodiversity outcomes. For example, new dwellings where landscape mitigation close to the house is desirable or required as an existing condition of subdivision consent. In these circumstances, the matters of discretion sought to be added by this submission will appropriately direct decision making. These include the ability to consider the suitability of low flammability	Amend the activity status in Rule NH-R5 where compliance is not achieved with PER-1 or PER-2 (inferred) from Discretionary to Restricted Discretionary Activity. Add the following matters of discretion: <b>a. The availability of water for fire-fighting;b. The scale of the extension or alteration;c. Alternative options for the location of the extension or alteration;d. The use of building materials to reduce fire risk;e. The extent and type of vegetation present andf. The</b>

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					plant species as fire risk mitigation adjoining the house.	<b>nature and density of any planting to reduce fire risk, including use of low flammability species.</b>
<b>The Shooting Box Limited (S187)</b>	S187.010	Natural hazards	NH-R5	Oppose	Refer to submission for detailed reasons for decision requested relating, but not limited to, change of activity status to restricted discretionary activity and matters managed by the rule are confined to the single issue of fire risk.	Amend the activity status in Rule NH-R5 where compliance is not achieved with PER-1 or PER-1 from Discretionary to <b>Restricted Discretionary Activity</b> . Add the following matters of discretion: <b>a. The availability of water for fire-fighting</b> <b>b. The scale of the extension or alteration</b> <b>c. Alternative options for the location of the extension or alteration</b> <b>d. The use of building materials to reduce fire risk. The extent and type of vegetation present; and</b> <b>f. The nature and density of any planting to reduce fire risk, including use of low flammability</b>
<b>Wendover Two Limited (S222)</b>	S222.009	Natural hazards	NH-R5	Oppose	Non-conformity with the rule should be a restricted discretionary activity, rather than full discretionary, as the matters managed by the rule are confined to the single issue of fire risk. There are circumstances where the rule can not be met, and indeed such an outcome would be a compromise compared to wider landscape and biodiversity outcomes. For example, new dwellings where landscape mitigation close to the house is desirable or required as an existing condition of subdivision consent. In these	Amend the activity status in Rule NH-R5 where compliance is not achieved with PER-1 or PER-1 from Discretionary to Restricted Discretionary Activity.  Insert the following matters of discretion: <b>a. the availability of water for fire-fighting</b> <b>b. The scale of the extension or alteration</b> <b>c. Alternative options</b>



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>circumstances, the matters of discretion sought to be added by this submission will appropriately direct decision making. These include the ability to consider the suitability of low flammability plant species as fire risk mitigation adjoining the house as described in the following reference:  <a href="https://fireandemergency.nz/home-and-community-fire-safety/flammability-of-plant-species/">https://fireandemergency.nz/home-and-community-fire-safety/flammability-of-plant-species/</a></p>	<p><b>for the location of the extension or alteration;d. The use of building materials to reduce fire risk;e. The extent and type of vegetation present andf. The nature and density of any planting to reduce fire risk, including use of low flammability species.</b></p>
<b>Matauri Trustee Limited (S243)</b>	S243.019	Natural hazards	NH-R5	Oppose	<p>Non-conformity with the rule should be a restricted discretionary activity, rather than full discretionary, as the matters managed by the rule are confined to the single issue of fire risk.</p> <p>There are circumstances where the rule cannot be met, and indeed such an outcome would be a compromise compared to wider landscape and biodiversity outcomes. For example, new dwellings where landscape mitigation close to the house is desirable or required as an existing condition of subdivision consent. In these circumstances, the matters of discretion sought to be added by this submission will appropriately direct decision making</p>	<p>Amend the activity status in Rule NH-R5 where compliance is not achieved with PER-1 or PER-2 (inferred) from discretionary to restricted discretionary activity.</p> <p>Insert the following matters of discretion:<b>a. The availability of water for fire-fighting;b. The scale of the extension or alteration;c. Alternative options for the location of the extension or alteration;d. The use of building materials to reduce fire risk;e. The extent and type of vegetation present andf. The nature and density of any planting to reduce fire risk, including use of low flammability species.</b></p>
<b>Willowridge Development</b>	S250.004	Natural hazards	NH-R5	Support in part	<p>It is considered that the risks to and of wild fire are suitably managed by the requirements to provide for a firefighting</p>	<p>Amend rule NH-R5 to remove PER-2</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>s Limited (S250)</b>					water supply in the Subdivision chapter. The Transport Chapter requires adequate standards for access for firefighting vehicles. It is not considered necessary to require a 20m setback from the dripline of bush areas, where the requirements of water supply and access are met.	
<b>New Zealand Maritime Parks Ltd (S251)</b>	S251.005	Natural hazards	NH-R5	Support in part	NZMPL note that PDP has retained provisions to manage the risks of wildfire, including the requirements for buildings used for vulnerable activities to be setback a minimum of 20m from "the dripline of any contiguous scrub or shrubland, woodlot or forestry". Whilst it is recognised that this is a risk that requires management, it is considered that wildfire is suitably managed by the requirements to provide a dedicated firefighting water supply and access that accommodates firefighting appliances in PER-R1, clauses (1) and (2) of rule NH-R5. Further, the Transport and Subdivision Chapters also contain provisions that set minimum access and firefighting water supply standards. In NZMPL's view, the risk is sufficiently managed by these provisions and there is no requirement to apply the setback provisions. Furthermore, the phrase "the dripline of any contiguous scrub or shrubland, woodlot or forestry" that appears in the ODP already creates interpretation issues and is inconsistently applied as there are no determining thresholds in the standard.	Delete PER-2 of Rule NH-R5
<b>Trent Simpkin (S283)</b>	S283.040	Natural hazards	NH-R5	Support in part	Submitter wants to be clear that his interpretation of rule is correct - if submitter has a house that's within 20m of bush, and we are in compliance with NZS4509 (or have approval from FENZ - maybe this needs to be added as another PER item) then we don't require a resource consent? Submitter fully supports not requiring a resource consent if a structure is within 20m of bush	Amend the rule to clarify the intent, that resource consent is not required if a structure is within 20m of bush and Fire and Emergency NZ have provided their approval.

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					and Fire and Emergency NZ have provided their approval.	
<b>P S Yates Family Trust (S333)</b>	S333.010	Natural hazards	NH-R5	Support in part	<p>Non-conformity with the rule should be a restricted discretionary activity, rather than full discretionary, as the matters managed by the rule are confined to the single issue of fire risk. There are circumstances where the rule can not be met, and indeed such an outcome would be a compromise compared to wider landscape and biodiversity outcomes. For example, new dwellings where landscape mitigation close to the house is desirable or required as an existing condition of subdivision consent. In these circumstances, the matters of discretion sought to be added by this submission will appropriately direct decision making. These include the ability to consider the suitability of low family plant species as fire risk mitigation adjoining the house as described in the following reference:  <a href="https://fireandemergency.nz/home-and-communityfire-safety/flammability-of-plant-species/">https://fireandemergency.nz/home-and-communityfire-safety/flammability-of-plant-species/</a></p>	<p>Amend the activity status in Rule NH-R5 where compliance is not achieved with PER-1 or PER-1 from Discretionary to Restricted Discretionary Activity.            Insert the following matters of discretion:<b>a. The availability of water for fire-fighting;b. The scale of the extension or alteration;c. Alternative options for the location of the extension or alteration;d. The use of building materials to reduce fire risk;e. The extent and type of vegetation present andf. The nature and density of any planting to reduce fire risk, including use of low flammability species.</b></p>
<b>Te Aupōuri Commercial Development Ltd (S339)</b>	S339.023	Natural hazards	NH-R5	Not Stated	<p>Rules NH-R5 and R6 require all new buildings and extensions or alterations to buildings that accommodate vulnerable activities to be set back a minimum of 20m from the dripline of any 'contiguous scrub or shrubland, woodlot or forestry', none of which are defined terms. This provision is very similar to that contained in Chapter 12 of the ODP and is often a trigger for resource consents, whereby FNDC typically request approval from Fire and Emergency NZ who assess whether there is adequate provision of fire sighting supply and access. There is considered to be adequate consideration of firefighting water supply within the NH-R5 and R6 PER-1 and TRAN-R3-PER-1.</p>	<p>Delete PER-2 from Rules NH-R5 and NH-R6.</p>

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					Therefore, it is considered unnecessary to include a setback requirement when there is already adequate provision of the firefighting supply and access requirements.	
<b>Wakaiti Dalton (S355)</b>	S355.016	Natural hazards	NH-R5	Support in part	NH-R5 and R6 require all new buildings and extensions or alterations to buildings that accommodate vulnerable activities to be set back a minimum of 20m from the dripline of any 'contiguous scrub or shrubland, woodlot or forestry', none of which are defined terms. This provision is very similar to that contained in Chapter 12 of the ODP and is often a trigger for resource consents, whereby FNDC typically request approval from Fire and Emergency NZ who assess whether there is adequate provision of fire sighting supply and access. There is considered to be adequate consideration of firefighting water supply within the NH-R5 and R6 PER-1 and TRAN-R3-PER-1. Therefore, it is considered unnecessary to include a setback requirement when there is already adequate provision of the firefighting supply and access requirements.	Delete PER-2 from rule NH-R5
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.072	Natural hazards	NH-R5	Support	Federated Farmers supports the inclusion of rules NH-R1, NH-2, NH-3, NH-5, NH-6, NH-7, NH-8, and NH-9 as currently worded in the proposed district plan.	Retain Rule NH-R5 or ensure that amendments include similar wording that achieves the same intent
<b>Tracy and Kenneth Dalton (S479)</b>	S479.010	Natural hazards	NH-R5	Support in part	Requires all new buildings and extensions or alterations to buildings that accommodate vulnerable activities to be set back a minimum of 20m from the dripline of any 'contiguous scrub or shrubland, woodlot or forestry', none of which are defined terms. This provision is very similar to that contained in Chapter 12 of the ODP and is often a trigger for resource consents, whereby FNDC typically request approval from Fire and Emergency NZ who assess whether there is adequate provision of fire sighting supply and access. There is	Delete PER-2

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					considered to be adequate consideration of firefighting water supply within the NH-R5 and R6 PER-1 and TRAN-R3-PER-1. Therefore, it is considered unnecessary to include a setback requirement when there is already adequate provision of the firefighting supply and access requirements.	
<b>Top Energy Limited (S483)</b>	S483.116	Natural hazards	NH-R5	Support	Top Energy supports that this rule only relates to non-habitable structures.	Retain Rule NH-R5
<b>James Phillips (S484)</b>	S484.002	Natural hazards	NH-R5	Oppose	No specific reason provided.	Delete NH-R5 in respect to the General Residential Zone.
<b>Northland Planning and Development 2020 Limited (S502)</b>	S502.043	Natural hazards	NH-R5	Support in part	Provision is requested to allow sites which have access to a fire hydrant, to be excluded from the 20 metres setback requirement. This is due to the sites which have access to a fire hydrant being located in urban zones, with good quick access to fire fighting services, and a stable high pressure water supply. Generally urban sites with fire hydrants in the area trigger consent due to bush areas within the vicinity of their site, such as on a public reserve where they are unable to mitigate the effect. Consents are currently processed with comments from FENZ which stipulate that they have no issue given the fire hydrant connection. The 135m requirement is the FENZ standard.	Amend NH-R5 PER-2 PER-2 Any building used for a vulnerable activity (excluding accessory buildings) is set back at least 20m from the dripline of any contiguous scrub or shrubland, woodlot or forestry. <b>Where the vulnerable activity is within 135m of a fire hydrant PER-2 does not apply.</b>
<b>Fire and Emergency New Zealand (S512)</b>	S512.022	Natural hazards	NH-R5	Support in part	Fire and Emergency support this rule as it will require vulnerable activities (including residential activities) to have adequate water for firefighting. However, demand on reticulated water systems can mean existing fire hydrants do not have sufficient pressure for firefighting	Amend NH-R5 Any building used for a vulnerable activity (excluding accessory buildings) either: 1. is located on a site that has <b>suitable</b> access to a fire hydrant(s) with sufficient water pressure and supply for firefighting as per the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<b>Supplies Code of Practice;</b> or 2. provides for <b>an alternative</b> water supply and access to water supplies for fire fighting purposes in compliance with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice
<b>Bentzen Farm Limited (S167)</b>	S167.011	Natural hazards	NH-R6	Support in part	Non-conformity with the rule should be a restricted discretionary activity as the matters managed by the rule are confined to the single issue of fire risk. The matter of discretion sought to be added by this submission will appropriately direct decision making.	Insert the following matter of discretion to rule NH-R6: f. The nature and density of any planting to reduce fire risk, including use of low flammability species.
<b>Setar Thirty Six Limited (S168)</b>	S168.018	Natural hazards	NH-R6	Support in part	Non-conformity with the rule should be a restricted discretionary activity, rather than full discretionary, as the matters managed by the rule are confined to the single issue of fire risk. There are circumstances where the rule cannot be met, and indeed such an outcome could be a compromise compared to wider landscape and biodiversity outcomes. For example, new dwellings where landscape mitigation close to the house is desirable or required as an existing condition of subdivision consent. In these circumstances, the matters of discretion sought to be added by this submission will appropriately direct decision making. These include the ability to consider the suitability of low flammability plant species as fire risk mitigation adjoining the house.	Insert the following matter of discretion to Rule NH-R6: <b>f. The nature and density of any planting to reduce fire risk, including use of low flammability species.</b>
<b>The Shooting Box Limited (S187)</b>	S187.011	Natural hazards	NH-R6	Support in part	Refer to submission for detailed reasons for decision requested relating, but not limited to, matters managed by the rule are confined to the single issue of fire risk.	Insert the following matter of discretion to Rule NH-R6: <b>f. The nature and density of any planting to reduce fire risk,</b>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<b>including use of low flammability species.</b>
<b>Wendover Two Limited (S222)</b>	S222.010	Natural hazards	NH-R6	Support in part	As per submission point 9.	Insert the following matter of discretion to rule NH-R6: <b>f. The nature and density of any planting to reduce fire risk, including use of low flammability species.</b>
<b>Matauri Trustee Limited (S243)</b>	S243.020	Natural hazards	NH-R6	Support in part	Non-conformity with the rule should be a restricted discretionary activity, rather than full discretionary, as the matters managed by the rule are confined to the single issue of fire risk. There are circumstances where the rule cannot be met, and indeed such an outcome would be a compromise compared to wider landscape and biodiversity outcomes. For example, new dwellings where landscape mitigation close to the house is desirable or required as an existing condition of subdivision consent. In these circumstances, the matters of discretion sought to be added by this submission will appropriately direct decision making	Insert the following matter of discretion to rule NH-R6: <b>f. The nature and density of any planting to reduce fire risk, including use of low flammability species.</b>
<b>Willowridge Developments Limited (S250)</b>	S250.005	Natural hazards	NH-R6	Support in part	It is considered that the risks to and of wild fire are suitably managed by the requirements to provide for a firefighting water supply in the Subdivision chapter. The Transport Chapter requires adequate standards for access for firefighting vehicles. It is not considered necessary to require a 20m setback from the dripline of bush areas, where the requirements of water supply and access are met.	Amend rule NH-R6 to remove PER-2
<b>New Zealand Maritime</b>	S251.006	Natural hazards	NH-R6	Support in part	NZMPL note that PDP has retained provisions to manage the risks of wildfire, including the requirements for buildings used	Delete PER-2 of Rule NH-R6

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Parks Ltd (S251)					for vulnerable activities to be setback a minimum of 20m from "the dripline of any contiguous scrub or shrubland, woodlot or forestry". Whilst it is recognised that this is a risk that requires management, it is considered that wildfire is suitably managed by the requirements to provide a dedicated firefighting water supply and access that accommodates firefighting appliances in PER-R1, clauses (1) and (2) of rule NH-R6. Further, the Transport and Subdivision Chapters also contain provisions that set minimum access and firefighting water supply standards. In NZMPL's view, the risk is sufficiently managed by these provisions and there is no requirement to apply the setback provisions. Furthermore, the phrase "the dripline of any contiguous scrub or shrubland, woodlot or forestry" that appears in the ODP already creates interpretation issues and is inconsistently applied as there are no determining thresholds in the standard.	
P S Yates Family Trust (S333)	S333.011	Natural hazards	NH-R6	Support in part	Non-conformity with the rule should be a restricted discretionary activity, rather than full discretionary, as the matters managed by the rule are confined to the single issue of fire risk. There are circumstances where the rule can not be met, and indeed such an outcome would be a compromise compared to wider landscape and biodiversity outcomes. For example, new dwellings where landscape mitigation close to the house is desirable or required as an existing condition of subdivision consent. In these circumstances, the matters of discretion sought to be added by this submission will appropriately direct decision making. These include the ability to consider the suitability of low family plant species as fire risk mitigation adjoining the house as	Insert the following matter of discretion to rule NH-R6: <b>f. The nature and density of any planting to reduce fire risk, including use of low flammability species.</b>



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					described in the following reference: <a href="https://fireandemergency.nz/home-and-communityfire-safety/flammability-of-plant-species/">https://fireandemergency.nz/home-and-communityfire-safety/flammability-of-plant-species/</a>	
<b>Te Aupōuri Commercial Development Ltd (S339)</b>	S339.024	Natural hazards	NH-R6	Not Stated	Rules NH-R5 and R6 require all new buildings and extensions or alterations to buildings that accommodate vulnerable activities to be set back a minimum of 20m from the dripline of any 'contiguous scrub or shrubland, woodlot or forestry', none of which are defined terms. This provision is very similar to that contained in Chapter 12 of the ODP and is often a trigger for resource consents, whereby FNDC typically request approval from Fire and Emergency NZ who assess whether there is adequate provision of fire sighting supply and access. There is considered to be adequate consideration of firefighting water supply within the NH-R5 and R6 PER-1 and TRAN-R3-PER-1. Therefore, it is considered unnecessary to include a setback requirement when there is already adequate provision of the firefighting supply and access requirements.	Delete PER-2 from Rules NH-R5 and NH-R6.
<b>Wakaiti Dalton (S355)</b>	S355.017	Natural hazards	NH-R6	Support in part	NH-R5 and R6 require all new buildings and extensions or alterations to buildings that accommodate vulnerable activities to be set back a minimum of 20m from the dripline of any 'contiguous scrub or shrubland, woodlot or forestry', none of which are defined terms. This provision is very similar to that contained in Chapter 12 of the ODP and is often a trigger for resource consents, whereby FNDC typically request approval from Fire and Emergency NZ who assess whether there is adequate provision of fire sighting supply and access. There is considered to be adequate consideration of firefighting water supply within the NH-R5 and R6 PER-1 and TRAN-R3-PER-1. Therefore, it is considered unnecessary to include a setback requirement when there is	Delete PER-2 from rule NH-R6.

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					already adequate provision of the firefighting supply and access requirements.	
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.073	Natural hazards	NH-R6	Support	Federated Farmers supports the inclusion of rules NH-R1, NH-2, NH-3, NH-5, NH-6, NH-7, NH-8, and NH-9 as currently worded in the proposed district plan.	Retain Rule NH-R6 or ensure that amendments include similar wording that achieves the same intent
<b>Tracy and Kenneth Dalton (S479)</b>	S479.011	Natural hazards	NH-R6	Support in part	Requires all new buildings and extensions or alterations to buildings that accommodate vulnerable activities to be set back a minimum of 20m from the dripline of any 'contiguous scrub or shrubland, woodlot or forestry', none of which are defined terms. This provision is very similar to that contained in Chapter 12 of the ODP and is often a trigger for resource consents, whereby FNDC typically request approval from Fire and Emergency NZ who assess whether there is adequate provision of fire sighting supply and access. There is considered to be adequate consideration of firefighting water supply within the NH-R5 and R6 PER-1 and TRAN-R3-PER-1. Therefore, it is considered unnecessary to include a setback requirement when there is already adequate provision of the firefighting supply and access requirements.	Delete PER-2
<b>Top Energy Limited (S483)</b>	S483.117	Natural hazards	NH-R6	Support	Top Energy supports that this rule only relates to non-habitable structures.	Retain Rule NH-R6
<b>James Phillips (S484)</b>	S484.003	Natural hazards	NH-R6	Oppose	No specific reason provided.	Delete NH-R6 in respect to the General Residential Zone.
<b>Northland Planning and Development 2020 Limited (S502)</b>	S502.044	Natural hazards	NH-R6	Support in part	Provision is requested to allow sites which have access to a fire hydrant, to be excluded from the 20 metres setback requirement. This is due to the sites which have access to a fire hydrant being located in urban zones, with good quick access to fire fighting services, and a stable high pressure water supply. Generally urban sites with fire hydrants in the area trigger consent due to	Amend NH-R6 PER-2 PER-2 Extensions or alterations that increase the GFA of a building used for a vulnerable activity (excluding accessory buildings) are set back at least 20m from the dripline of any contiguous scrub or shrubland, woodlot or forestry. <b>Where the</b>

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					bush areas within the vicinity of their site, such as on a public reserve where they are unable to mitigate the effect. Consents are currently processed with comments from FENZ which stipulate that they have no issue given the fire hydrant connection. The 135m requirement is the FENZ standard.	<b>vulnerable activity is within 135m of a fire hydrant PER-2 does not apply.</b>
<b>Fire and Emergency New Zealand (S512)</b>	S512.023	Natural hazards	NH-R6	Support in part	Fire and Emergency support this rule as it will require vulnerable activities (including residential activities) to have adequate water for firefighting. However, demand on reticulated water systems can mean existing fire hydrants do not have sufficient pressure for firefighting. Fire and Emergency support the inclusion of considerations around building materials and vegetation types under the matters of discretion.	Amend NH-R6 Extensions or alterations that increase the GFA of a building used for a vulnerable activity (excluding accessory buildings) either: a. is located on a site that has <b>suitable</b> access to a fire hydrant(s) <b>with sufficient waterpressure and supply for firefighting as perthe SNZ PAS 4509:2008 New Zealand FireService Firefighting Water Supplies Code ofPractice;</b> or b. provides <b>for an alternative</b> water supply and access to water supplies for fire fighting purposes in compliance with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice. Matters of discretion are restricted to: a. <del>The availability</del> <b>adequacy (volume, pressure and access)</b> of water for firefighting; b. The scale of the extension or alteration; c. Alternative options for the

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						location of the extension or alteration; d. The use of building materials to reduce fire risk; and e. The extent and type of vegetation present
<b>Ministry of Education Te Tāhuhu o Te Mātauranga (S331)</b>	S331.034	Natural hazards	NH-R7	Support in part	<p>The submitter supports in part rule NH-R7 New buildings, and extensions or alterations that increase the GFA of existing buildings, and acknowledges the risk which natural hazards can pose on people, property and the environment, particularly for vulnerable activities. However, NH-R7 RDIS-1 is not clear in its wording. The submitter interprets the rule as, where the new building, extension or alteration is or will be used for a vulnerable activity, it should not be located in the 1 in 10 year River Flood Hazard area (and where compliance is not achieved, it becomes a Non-Complying activity). The submitter supports that vulnerable activities should not be located in the 1 in 10 year River Flood Hazard area. This had already been reflected in NH-R12 and the Ministry recommends deletion from NH-R7 for clarity.</p> <p>Vulnerable activities should be allowed to establish in the 1 in 100 year flood hazard area as a restricted discretionary activity if they comply with the appropriate building standards (as set out in NH-R7).</p>	Amend rule rule NH-R7 New buildings, and extensions or alterations that increase the GFA of existing buildings, as follows: New buildings, and extensions or alterations that increase the GFA of existing buildings Activity status: Restricted Discretionary Where: RDIS-1 The new building, extension or alteration is not located in the 1 in 10 Year River Flood Hazard area. <del>and is or will be used for a vulnerable activity.</del> RDIS-2 The finished floor level of: a. any new building or extension or alteration to an existing building that will accommodate vulnerable activities must be at least 500mm above the maximum water level in a 1 in 100 year flood event; b. any extension or alteration that increases the GFA of a building that accommodates vulnerable activities must be at

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						<p>least 500mm above the maximum water level in a 1 in 100 year flood event; and</p> <p>c. all other new buildings, or extensions or alterations to existing buildings, must be at least 300mm above the maximum water level in a 1 in 100 year flood event.</p> <p>RDIS-3 The new, extended or altered building does not divert an overland flow path onto other properties.</p> <p>RIDS-4 The building complies with standard: NH-S1 Information requirements Matters of discretion are limited to:</p> <p>a. the effects of flood hazards on the integrity of the building to the extent that such effects are not appropriately managed by the building consent process under the Building Act 2004;</p> <p>b. whether the works are likely to accelerate, worsen or result in material damage to that land, other land or any building or structure through inundation;</p> <p>c. the effects of the</p>

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						<p>development, including earthworks, on overland flow paths and flood depths, velocity or frequency within the site or on surrounding sites;</p> <p>d. the ability to relocate the building or structure or adapt to the flood hazard over time or in response to direct effects of the hazard;</p> <p>e. the extent to which the risk to people and property from the flood hazard is avoided or managed;</p> <p>f. the nature of the activity being undertaken and its vulnerability to the potential effects of flooding;</p> <p>g. provision of safe access and egress to the building or structure during a flood event;</p> <p>h. whether there is a functional or operational need for the building, structure or activity to be located within the flood hazard area;</p> <p>i. the proposed use of, necessity for and design of engineering solutions (soft or hard) to mitigate the hazard;</p> <p>j. the resilience of the buildings or structures to the effects of the hazard; and</p>

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						<p>k. the methods provided to manage activities and uses within the site, including safe egress from buildings or structures or the site and the management of people and property during a flood event.</p> <p>Activity status where compliance with RDIS-1 is not achieved: Non-complying (refer Rule NH-R12)</p> <p>Activity status where compliance with RDIS-2, RDIS-3 or RDIS-4 is not achieved: Discretionary</p>
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.074	Natural hazards	NH-R7	Support	Federated Farmers supports the inclusion of rules NH-R1, NH-2, NH-3, NH-5, NH-6, NH-7, NH-8, and NH-9 as currently worded in the proposed district plan.	Retain Rule NH-R7 or ensure that amendments include similar wording that achieves the same intent
<b>Ngā Tai Ora - Public Health Northland (S516)</b>	S516.047	Natural hazards	NH-R7	Support	Ngā Tai Ora support the concept of managing vulnerable activities within hazard areas.	Retain Rule NH-R7
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.075	Natural hazards	NH-R8	Support	Federated Farmers supports the inclusion of rules NH-R1, NH-2, NH-3, NH-5, NH-6, NH-7, NH-8, and NH-9 as currently worded in the proposed district plan.	Retain Rule NH-R8 or ensure that amendments include similar wording that achieves the same intent
<b>Ngā Tai Ora - Public Health Northland (S516)</b>	S516.048	Natural hazards	NH-R8	Support	Ngā Tai Ora support the concept of managing vulnerable activities within hazard areas.	Retain Rule NH-R8
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.049	Natural hazards	NH-R9	Support	not stated	Retain NH-R9 as notified
<b>Northland Federated</b>	S421.076	Natural hazards	NH-R9	Support	Federated Farmers supports the inclusion of rules NH-R1, NH-2, NH-3, NH-5, NH-6, NH-	Retain Rule NH-R9 or ensure that amendments include similar wording

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Farmers of New Zealand (S421)					7, NH-8, and NH-9 as currently worded in the proposed district plan.	that achieves the same intent
Transpower New Zealand Ltd (S454)	S454.074	Natural hazards	NH-R9	Support	Transpower supports the inclusion of NH-R9 in the FNPDP.	Retain NH-R9
Ngā Tai Ora - Public Health Northland (S516)	S516.049	Natural hazards	NH-R12	Support	Ngā Tai Ora support the concept of managing vulnerable activities within hazard areas.	Retain Rule NH-R12
Lynley Newport (S93)	S93.014	Natural hazards	Standards	Support in part	Support the need to manage development within coastal hazard areas but believe all hazard provisions should be located in the Natural Hazards chapter. A cross reference in the Coastal Environment back to the Natural hazards chapter can be included.	Transfer the standards from the Coastal Environment chapter (rules section addressing coastal hazards) into the Natural Hazards chapter. Consequently, insert a cross reference within the Coastal Environment chapter to this effect.
Bentzen Farm Limited (S167)	S167.012	Natural hazards	NH-S1	Oppose	The information requirement applies the need for a report prepared by a suitably qualified and experienced engineer/instability to activities and subdivision on the site as a whole, rather than just that part impacted by the identified natural hazard, imposing unnecessary cost. The amendments sought target the requirements just to the mapped hazard area location.	Amend Information Requirement NH-S1 as follows: Any application for a resource consent in relation to a <b>site location</b> that is potentially affected by natural hazards must be accompanied by a report prepared by a suitably qualified and experienced engineer that addresses the matters identified in the relevant objectives, policies, performance standards and matters of control/discretion.
Setar Thirty Six Limited (S168)	S168.019	Natural hazards	NH-S1	Oppose	The information requirement applies the need for a report prepared by a suitably qualified and experienced engineer/instability to activities and subdivision on the site as a whole, rather than just that part impacted by the identified natural hazard, imposing unnecessary cost. The amendments sought	Amend Standard NH-S1 as follows: Any application for a resource consent in relation to a <b>site location</b> that is potentially affected by natural hazards must be accompanied by a report



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					target the requirements just to the mapped hazard area location.	prepared by a suitably qualified and experienced engineer that addresses the matters identified in the relevant objectives, policies, performance standards and matters of control/discretion.
<b>The Shooting Box Limited (S187)</b>	S187.012	Natural hazards	NH-S1	Oppose	The information requirement applies the need for a report prepared by a suitably qualified and experienced engineer/instability to activities and subdivision on the site as a whole, rather than just that part impacted by the identified natural hazard, imposing unnecessary cost. The amendments sought target the requirements just to the mapped hazard area location.	Amend Information Requirement NH-S1 as follows: Any application for a resource consent in relation to a <b>site location</b> that is potentially affected by natural hazards must be accompanied by a report prepared by a suitably qualified and experienced engineer that addresses the matters identified in the relevant objectives, policies, performance standards and matters of control/discretion.
<b>Wendover Two Limited (S222)</b>	S222.019	Natural hazards	NH-S1	Support in part	The information requirement applies the need for a report prepared by a suitably qualified and experienced engineer/instability to activities and subdivision on the site as a whole, rather than just that part impacted by the identified natural hazard, imposing unnecessary cost. The amendments sought target the requirements just to the mapped hazard area location.	Amend Information Requirement NH-S1 as follows: Any application for a resource consent in relation to a <b>site location</b> that is potentially affected by natural hazards must be accompanied by a report prepared by a suitably qualified and experienced engineer that addresses the matters identified in the relevant objectives, policies, performance standards

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						and matters of control/discretion.
<b>Matauri Trustee Limited (S243)</b>	S243.021	Natural hazards	NH-S1	Oppose	The information requirement applies the need for a report prepared by a suitably qualified and experienced engineer/instability to activities and subdivision on the site as a whole, rather than just that part impacted by the identified natural hazard, imposing unnecessary cost. The amendments sought target the requirements just to the mapped hazard area location	Amend Information Requirement NH-S1 as follows: Any application for a resource consent in relation to a <b>site location</b> that is potentially affected by natural hazards must be accompanied by a report prepared by a suitably qualified and experienced engineer that addresses the matters identified in the relevant objectives, policies, performance standards and matters of control/discretion
<b>P S Yates Family Trust (S333)</b>	S333.012	Natural hazards	NH-S1	Support in part	The information requirement applies the need for a report prepared by a suitably qualified and experienced engineer/instability to activities and subdivision on the site as a whole, rather than just that part impacted by the identified natural hazard, imposing unnecessary cost. The amendments sought target the requirements just to the mapped hazard area location.	Amend Information Requirement NH-S1 as follows: Any application for a resource consent in relation to a <b>site location</b> that is potentially affected by natural hazards must be accompanied by a report prepared by a suitably qualified and experienced engineer that addresses the matters identified in the relevant objectives, policies, performance standards and matters of control/discretion
<b>Top Energy Limited (S483)</b>	S483.118	Natural hazards	NH-S1	Not Stated	The information standard is not linked in the table and located at the end of the page making it easy to miss. The standard should be linked in the second column of the rules table to make it clear that where	Insert requirement to comply with Standard NH-S1 where resource consent is required in the activities table

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					resource consent is required, compliance must be achieved with NH-S1.	
<b>Omata Estate (S548)</b>	S548.005	Natural hazards	NH-S1	Oppose	site-specific engineering report should be dependent on the nature and scale of a proposal and the proximity of the proposal to an area identified as being potential affected by a natural hazard. Applying a blanket requirement to provide a site-specific engineering report for any resource consent applications for a site potentially affected by a natural hazard would result in undue cost constraints to applicant and does not meet the requirements of s32.	delete NH-S1
<b>Kāinga Ora Homes and Communities (S561)</b>	S561.044	Natural hazards	NH-S1	Oppose	The reference to "potentially affected" is not specific and the comment should clarify that this relates to the mapped hazard areas.	Amend NH-S1 as follows: Information requirements Any application for a resource consent in relation to a site that is potentially affected by <b>the mapped natural hazards (as noted in the Plan definitions)</b> must be accompanied by a report prepared by a suitably qualified and experienced engineer that addresses the matters identified in the relevant objectives, policies, performance standards and matters of control/discretion.
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.078	Hazardous substances	Overview	Support	Federated Farmers supports the overview for hazardous substances as it is currently proposed. The overview recognises the role the Hazardous Substances and New Organisms Act 1996 plays in the regulation of substances as well as the need to restrict duplication of rules between councils and other organisations involved with hazardous substances.	Retain the Overview or ensure that amendments include similar wording that achieves the same intent

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<b>Horticulture New Zealand (S159)</b>	S159.044	Hazardous substances	HS-O1	Support	The approach in the plan is supported with a focus on significant hazardous facilities.	Retain Objective HS-O1
<b>BP Oil New Zealand Limited, Mobil Oil New Zealand Limited, Z Energy Limited (S335)</b>	S335.002	Hazardous substances	HS-O1	Support	The fact that the focus is not solely on distance, the objective appropriately recognises that a range of factors are relevant to potential reverse sensitivity effects, although doesn't identify what they are or could be.	Retain Objective HS-O1 as notified
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.079	Hazardous substances	HS-O1	Support	Federated Farmers supports the objectives and policies proposed for hazardous substances.	Retain Objective HS-O1 or ensure that amendments include similar wording that achieves the same intent
<b>Ministry of Education Te Tāhuhu o Te Mātauranga (S331)</b>	S331.035	Hazardous substances	HS-O2	Support	The submitter supports objective HS-O2 as significant hazardous facilities should not be located adjacent to sensitive activities including educational facilities and preschools so as to manage adverse effects on school students and staff and to manage reverse sensitivity effects.	Retain objective HS-O2 as proposed.
<b>BP Oil New Zealand Limited, Mobil Oil New Zealand Limited, Z Energy Limited (S335)</b>	S335.003	Hazardous substances	HS-O2	Support	The fact that the focus is not solely on distance, the objective appropriately recognises that a range of factors are relevant to potential reverse sensitivity effects, although doesn't identify what they are or could be.	Retain Objective HS-O2 as notified
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.080	Hazardous substances	HS-O2	Support	Federated Farmers supports the objectives and policies proposed for hazardous substances.	Retain Objective HS-O2 or ensure that amendments include similar wording that achieves the same intent
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.038	Hazardous substances	HS-P1	Support	We support separation distances from natural water bodies and other sensitive environments as required by Policies HS-P1 - HSP3.	Retain Policy HS-P1

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					We note our earlier submission that the definition of Sensitive Activities should include sites of significance to tangata whenua other than marae. For example urupā (burial grounds) are sensitive sites and may not always be associated with marae.	
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.081	Hazardous substances	HS-P1	Support	Federated Farmers supports the objectives and policies proposed for hazardous substances.	Retain Policy HS-P1 or ensure that amendments include similar wording that achieves the same intent
<b>BP Oil New Zealand Limited, Mobil Oil New Zealand Limited, Z Energy Limited (S335)</b>	S335.004	Hazardous substances	HS-P2	Support	The policy requires separation distances or mitigation, to manage the effects of reverse sensitivity between SHF and sensitive activities.	Retain Policy HS-P2 as notified
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.039	Hazardous substances	HS-P2	Support	We support separation distances from natural water bodies and other sensitive environments as required by Policies HS-P1 - HSP3. We note our earlier submission that the definition of Sensitive Activities should include sites of significance to tangata whenua other than marae. For example urupā (burial grounds) are sensitive sites and may not always be associated with marae.	Retain Policy HS-P2
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.082	Hazardous substances	HS-P2	Support	Federated Farmers supports the objectives and policies proposed for hazardous substances.	Retain Policy HS-P2 or ensure that amendments include similar wording that achieves the same intent
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.040	Hazardous substances	HS-P3	Support	We support separation distances from natural water bodies and other sensitive environments as required by Policies HS-P1 - HSP3. We note our earlier submission that the definition of Sensitive Activities should include sites of significance to tangata	Retain Policy HS-P3

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					whenua other than marae. For example urupā (burial grounds) are sensitive sites and may not always be associated with marae.	
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.083	Hazardous substances	HS-P3	Support	Federated Farmers supports the objectives and policies proposed for hazardous substances.	Retain Policy HS-P3 or ensure that amendments include similar wording that achieves the same intent
<b>Transpower New Zealand Ltd (S454)</b>	S454.075	Hazardous substances	Rules	Not Stated	The use, storage or disposal of hazardous substances in greater than normal household usage quantities within the National Grid Yard poses a potentially significant health and safety risk to people and communities. Transpower therefore requests a new Hazardous Substances rule that limits the use, storage or disposal of hazardous substances to normal household use volumes within the National Grid Yard as a permitted activity.	Insert a new rule in the Hazardous Substances chapter of the FNPDP as follows: <b>HS-Rx The use storage or disposal of hazardous substances near the National GridAll ZonesActivity status: PermittedWhere:HH. Normal household usage volumes of hazardous substances are used, stored or disposed of.Activity status when compliance not achieved with HS-R1.1: Non complying</b>
<b>Transpower New Zealand Ltd (S454)</b>	S454.076	Hazardous substances	Rules	Not Stated	Hazardous facilities located within the National Grid Yard can pose a potentially significant health and safety risk to people and communities. Transpower requests that any new hazardous facility within 12m of the centre line of a National Grid Transmission line be a non-complying activity.	Insert a new rule in the Hazardous Substances chapter of the FNPDP as follows: <b>HS-Rx New significant hazardous facility in the National Grid YardAll ZonesActivity status: Non-complying</b>
<b>Top Energy Limited (S483)</b>	S483.119	Hazardous substances	Rules	Oppose	Whangārei District Council has recently notified Plan Change 91 to the Whangārei District Plan which proposes to retain objectives and policies relating to hazardous substances for the consideration at resource consent stage, but deletes any rules relating to hazardous substances. Top Energy supports the WDC approach	Delete rules for hazardous substances in the PDP.

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					which is consistent with the 2017 RMA amendments which removed explicit function for local authorities to control the adverse effects of the storage, use, disposal, and transportation of hazardous substances.	
<b>BP Oil New Zealand Limited, Mobil Oil New Zealand Limited, Z Energy Limited (S335)</b>	S335.005	Hazardous substances	HS-R1	Support in part	It is unclear whether the rule is intended to capture other activities such as alterations, upgrades and changes. The section 32 report indicates that the intent of the rule is to "enable maintenance, repair and alteration of Significant Hazardous Facilities to occur as a permitted activity provided there is no increase in residual risks"	Amend Rule title HS-R1 Maintenance, <del>and</del> repair <b>and alteration</b> of a significant hazardous facility
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.084	Hazardous substances	HS-R1	Support	Federated Farmers supports rules HS-R1 and HS-R2 as currently drafted in the proposed district plan.	Retain Rule HS-R1 or ensure that amendments include similar wording that achieves the same intent
<b>Ngāti Rangī ki Ngāwhā Hapu (S304)</b>	S304.005	Hazardous substances	HS-R2	Oppose	As atua of cultivated food, Rongomātāne plays a fundamental role in our region. The fertility of our soils both from Papatūānuku allows the region to be a produce leader. Ngāti Rangī wishes to maintain the fertility of our soils as part of the gifts from Papatūānuku. Because Rongomātāne only covers cultivated food, the main issues for this section are connected with intensive horticultural land use activities, such as market gardens, and impacts on soil structure. Issues around water quality and land use have been covered in Tangaroa-i-te-wai-māori and Papatūānuku. The Ngāti Rangī rohe, with its rich volcanic soils, is a market gardening stronghold. However, market gardens can place pressure on local water bodies through abstractions and discharges, and can degrade soil structure and reduce its quality and quantity. The impacts of herbicides,	Amend to ensure that relevant authorities will provide feedback to Ngāti Rangī on the use of agrichemicals in the rohe in particular NIEP, and consenting authorities will not grant consents for horticultural activities (including vegetable washing) where that consent allows discharges (diffuse or otherwise) of nutrients, agrichemicals, or sediment to local water bodies (including groundwater).

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					pesticides, and fertilisers are a matter of concern for Ngāti Rangi. Refer to Sections 5.1.2 and 5.1.3 of Ngati Rangi's Hapu Environmental Management Plan).	
<b>Ministry of Education Te Tāhuhu o Te Mātauranga (S331)</b>	S331.036	Hazardous substances	HS-R2	Support	The submitter supports rule HS-R2 Establishment of a new significant hazardous facility, in the Heavy Industrial zone, as significant hazardous facilities should be set back from sensitive activities including educational facilities and preschools, therefore the submitter supports the inclusion of a specific distance which the hazardous facility must be setback by.	Retain rule HS-R2 Establishment of a new significant hazardous facility, in the Heavy Industrial zone, as proposed.
<b>Ministry of Education Te Tāhuhu o Te Mātauranga (S331)</b>	S331.037	Hazardous substances	HS-R2	Support	The submitter supports rule HS-R2 Establishment of a new significant hazardous facility, in the Light Industrial zone, Rural Production zone, Ngawha Innovation and Enterprise Park zone, as significant hazardous facilities should be set back from sensitive activities including educational facilities and preschools.	Retain rule HS-R2 Establishment of a new significant hazardous facility, in the Light Industrial zone, Rural Production zone, Ngawha Innovation and Enterprise Park zone, as proposed.
<b>Ministry of Education Te Tāhuhu o Te Mātauranga (S331)</b>	S331.038	Hazardous substances	HS-R2	Support	The submitter supports rule HS-R2 Establishment of a new significant hazardous facility, and agrees that significant hazardous facilities should not be established in zones which are likely to contain sensitive activities including educational facilities and preschools.	Retain rule HS-R2 Establishment of a new significant hazardous facility as proposed.
<b>Waipapa Pine Limited and Adrian Broughton Trust (S342)</b>	S342.020	Hazardous substances	HS-R2	Support in part	The new Heavy Industry Zone has been applied to an area which was previously zoned Rural Production. This new zone should have precedence and the limits of the Rule should only apply to sensitive activities not within the Heavy Industrial Zone.	amend HS-R2 ,PER-2 to include the following exemption - <b>The sensitive activity must be located in a zone other than the Heavy Industrial Zone.</b>
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.085	Hazardous substances	HS-R2	Support	Federated Farmers supports rules HS-R1 and HS-R2 as currently drafted in the proposed district plan.	Retain Rule HS-R2 or ensure that amendments include similar wording that achieves the same intent



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<b>Fire and Emergency New Zealand (S512)</b>	S512.024	Hazardous substances	HS-R2	Support in part	Fire and Emergency support the consideration of proximity between sensitive land uses and significant hazardous facilities. Where sites store substantial quantities that release a toxic or flammable gas (e.g. chlorine or ammonia gas) or where the substance could cause an explosion during a fire (e.g. ammonia nitrate), the proposed 250m setback distance may be insufficient as sensitive activities could be impacted 500-1000m or more away	Amend HS-R2 Council to identify whether a two-tiered approach to setbacks for sensitive land uses could be more effective to safeguard communities by differentiating between the potential catchment of flammable gas or explosions compared to other 'significant hazardous facilities' with less reach.
<b>Ngāti Rangī ki Ngāwhā (S515)</b>	S515.010	Hazardous substances	HS-R2	Oppose	As atua of cultivated food, Rongomātāne plays a fundamental role in our region. The fertility of our soils both from Papatūānuku allows the region to be a produce leader. Ngāti Rangī wishes to maintain the fertility of our soils as part of the gifts from Papatūānuku. Because Rongomātāne only covers cultivated food, the main issues for this section are connected with intensive horticultural land use activities, such as market gardens, and impacts on soil structure. Issues around water quality and land use have been covered in Tangaroa-i-te-wai-māori and Papatūānuku. The Ngāti Rangī rohe, with its rich volcanic soils, is a market gardening stronghold. However, market gardens can place pressure on local water bodies through abstractions and discharges, and can degrade soil structure and reduce its quality and quantity. The impacts of herbicides, pesticides, and fertilisers are a matter of concern for Ngāti Rangī. Refer to Sections 5.1.2 and 5.1.3 of Ngāti Rangī's Hapu Environmental Management Plan).	Amend to ensure that relevant authorities will provide feedback to Ngāti Rangī on the use of agrichemicals in the rohe in particular NIEP, and consenting authorities will not grant consents for horticultural activities (including vegetable washing) where that consent allows discharges (diffuse or otherwise) of nutrients, agrichemicals, or sediment to local water bodies (including groundwater).
<b>Ngā Tai Ora - Public Health Northland (S516)</b>	S516.051	Hazardous substances	HS-R2	Not Stated	Ngā Tai Ora support the concept of separating Significant Hazardous Facilities from sensitive activities and sensitive environments. However, the section 32 evaluation report does not provide any	Amend the Hazardous Substances provisions, undertaking a technical assessment to confirm that the proposed 250m separation is sufficient to manage the risk to public

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					justification or technical evidence to support the proposed minimum setback of 250m.	health and safety and the environment. That Council complete a section 32AA evaluation of the rules to determine what is the most efficient and effective separation distance to give effect to the objectives and policies. That Council update the provisions based upon the findings of technical assessment and section 32AA evaluation.
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.041	Hazardous substances	HS-R3	Not Stated	The rules relating to establishment of a new significant hazardous facility all other zones should include a setback to ensure they are not located immediately adjacent to a sensitive environment.	Amend Rule HS-R3 as follows: HS-R3: Significant hazardous facility within the coastal environment <b>or within 100m of the coastal environment</b>
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.042	Hazardous substances	HS-R4	Not Stated	The rules relating to establishment of a new significant hazardous facility all other zones should include a setback to ensure they are not located immediately adjacent to a sensitive environment.	Amend Rule HS-R4 as follows: HS-R4: Significant hazardous facility within an outstanding natural feature or landscape <b>or within 100m of an outstanding natural feature or landscape</b>
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.043	Hazardous substances	HS-R5	Not Stated	The rules relating to establishment of a new significant hazardous facility all other zones should include a setback to ensure they are not located immediately adjacent to a sensitive environment. With respect to HS-R5 we note our earlier submission that the definition of a scheduled site does not recognise that many sites of significance to Māori are not mapped or otherwise identified. There are many reasons why the location of sites may not be shared.	Amend Rule HS-R5 as follows: HS-R5: Significant hazardous facility within a scheduled site and area of significance to Māori <b>or within 100m of a scheduled site and/or area of significance to Māori</b>

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Te Hiku Iwi Development Trust (S399)	S399.044	Hazardous substances	HS-R6	Not Stated	The rules relating to establishment of a new significant hazardous facility all other zones should include a setback to ensure they are not located immediately adjacent to a sensitive environment.	Amend Rule HS-R6 as follows: HS-R6:Significant hazardous facility within a significant natural area <b>or within 100m of a significant natural area</b>
Northland Federated Farmers of New Zealand (S421)	S421.086	Hazardous substances	HS-R6	Support in part	Federated Farmers supports the intent of the additional measures of protection provided by these rules which propose to make certain activities related to significant hazardous facilities non-complying. The definition for 'significant hazardous facilities' captures activities that potentially occur on farms such as milk processing plants and the manufacturing, including the associated storage, of hazardous substances (including agrichemicals, fertilisers, acids/alkalis, or paints). For rules HS-R6, HS-R7 and HS-R8 it is felt that the appropriate activity classification would be discretionary rather than non-complying. This would allow the Council to set the appropriate matters of discretion for controlling significant hazardous facilities within a significant natural area, and flood or coastal hazard areas. By changing the activity status for these rules, the default status for activities not complying with the rules could be non-complying which provides the Council with another opportunity to place appropriate controls on the activity	Amend the activity classification for Rule HS-R6 to discretionary, with the default status for activities not meeting the rule to be non-complying
Te Hiku Iwi Development Trust (S399)	S399.045	Hazardous substances	HS-R7	Not Stated	The rules relating to establishment of a new significant hazardous facility all other zones should include a setback to ensure they are not located immediately adjacent to a sensitive environment.	Amend Rule HS-R7 as follows: HS-R7:Significant hazardous facility within a flood hazard area <b>or within 100m of a flood hazard area</b>
Northland Federated Farmers of	S421.087	Hazardous substances	HS-R7	Support in part	Federated Farmers supports the intent of the additional measures of protection provided by these rules which propose to make	Amend the activity classification for Rule HS-R7 to discretionary, with the default status for activities not

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New Zealand (S421)					<p>certain activities related to significant hazardous facilities non-complying. The definition for 'significant hazardous facilities' captures activities that potentially occur on farms such as milk processing plants and the manufacturing, including the associated storage, of hazardous substances (including agrichemicals, fertilisers, acids/alkalis, or paints). For rules HS-R6, HS-R7 and HS-R8 it is felt that the appropriate activity classification would be discretionary rather than non-complying. This would allow the Council to set the appropriate matters of discretion for controlling significant hazardous facilities within a significant natural area, and flood or coastal hazard areas.</p> <p>By changing the activity status for these rules, the default status for activities not complying with the rules could be non-complying which provides the Council with another opportunity to place appropriate controls on the activity</p>	meeting the rule to be non-complying
Ngā Tai Ora - Public Health Northland (S516)	S516.053	Hazardous substances	HS-R7	Support	Ngā Tai Ora support the non-complying activity status for proposed rules HS-R7 and R8. Locations subject to natural hazards, which can increase the likelihood of a release of a hazardous substance into the environment should a natural hazard event occur.	Retain Rule HS-R7
Te Hiku Iwi Development Trust (S399)	S399.046	Hazardous substances	HS-R8	Not Stated	The rules relating to establishment of a new significant hazardous facility all other zones should include a setback to ensure they are not located immediately adjacent to a sensitive environment.	Amend Rule HS-R8 as follows: HS-R8: Significant hazardous facility within a coastal hazard area <b>or within 100m of a coastal hazard area</b>
Northland Federated Farmers of New Zealand (S421)	S421.088	Hazardous substances	HS-R8	Support in part	Federated Farmers supports the intent of the additional measures of protection provided by these rules which propose to make certain activities related to significant hazardous facilities non-complying.	Amend the activity classification for Rule HS-R8 (inferred) to discretionary, with the default status for activities not meeting the rule to be

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					<p>The definition for 'significant hazardous facilities' captures activities that potentially occur on farms such as milk processing plants and the manufacturing, including the associated storage, of hazardous substances (including agrichemicals, fertilisers, acids/alkalis, or paints). For rules HS-R6, HS-R7 and HS-R8 it is felt that the appropriate activity classification would be discretionary rather than non-complying. This would allow the Council to set the appropriate matters of discretion for controlling significant hazardous facilities within a significant natural area, and flood or coastal hazard areas.</p> <p>By changing the activity status for these rules, the default status for activities not complying with the rules could be non-complying which provides the Council with another opportunity to place appropriate controls on the activity</p>	non-complying
<b>Ngā Tai Ora - Public Health Northland (S516)</b>	S516.054	Hazardous substances	HS-R8	Support	Ngā Tai Ora support the non-complying activity status for proposed rules HS-R7 and R8. Locations subject to natural hazards, which can increase the likelihood of a release of a hazardous substance into the environment should a natural hazard event occur.	Retain Rule HS-R8
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.047	Hazardous substances	HS-R9	Not Stated	The rules relating to establishment of a new significant hazardous facility all other zones should include a setback to ensure they are not located immediately adjacent to a sensitive environment.	Amend Rule HS-R9 as follows: HS-R9: Significant hazardous facility within a scheduled heritage resource <b>or within 100m of a scheduled heritage resource</b>
<b>Ministry of Education Te Tāhuhu o Te Mātauranga (S331)</b>	S331.039	Hazardous substances	HS-R11	Support	The submitter supports rule HS-R11 New sensitive activities, as sensitive activities including educational facilities and preschools should not be located adjacent to significant hazardous facilities. The submitter supports the inclusion of a specific distance which the educational facility must be	Retain rule HS-R11 New sensitive activities, as proposed.

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					setback from an existing significant hazardous facility so as to manage adverse effects to school students and staff and to manage reverse sensitivity effects.	
<b>Ngā Tai Ora - Public Health Northland (S516)</b>	S516.052	Hazardous substances	HS-R11	Support	Ngā Tai Ora support the buffering and separation of Significant Hazardous Facilities from sensitive activities and environments.	Retain Rule HS-R11
<b>Russell Protection Society (INC) (S179)</b>	S179.040	Heritage area overlays	Overview	Support		Retain overview for heritage area overlays
<b>Te Hiku Community Board (S257)</b>	S257.012	Heritage area overlays	Overview	Oppose	We do not support the new heritage overlays at Mangonui and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui.	Delete from the Overview the text relating to Mangonui and Rangitoto Peninsula Heritage Area Part B
<b>Sean Frieling (S357)</b>	S357.012	Heritage area overlays	Overview	Oppose	Do not support the new heritage overlays at Mangonui, and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui.	Delete from the Overview the text relating to Mangonui and Rangitoto Peninsula Heritage Area Part B
<b>Leah Frieling (S358)</b>	S358.012	Heritage area overlays	Overview	Oppose	We do not support the new heritage overlays at Mangonui, and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui.	Delete from the Overview the text relating to Mangonui and Rangitoto Peninsula Heritage Area Part B
<b>John Andrew Riddell (S431)</b>	S431.049	Heritage area overlays	Overview	Not Stated	The overview to the Heritage Area Overlays chapter include several notable omissions in terms of history, values and characteristics.	Amend the Overview statement for the Kerikeri Heritage Area Overlay Part B, to include the following statement: <b>Historic values, particularly of Part A, can be adversely affected by the nature and scale of development within Part B of this Overlay, where that development results in visual dominance in relation to the Kerikeri Mission Station buildings and to Kororipo Pa</b>

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John Andrew Riddell (S431)	S431.050	Heritage area overlays	Overview	Not Stated	The overview to the Heritage Area Overlays chapter include several notable omissions in terms of history, values and characteristics.	Amend the Overview statement for the Kororāreka Russell Heritage Area Overlay to insert a reference to the 1845 battle of Kororāreka to the end of the first paragraph.
John Andrew Riddell (S431)	S431.051	Heritage area overlays	Overview	Not Stated	The overview to the Heritage Area Overlays chapter include several notable omissions in terms of history, values and characteristics.	Amend the last sentence of the second paragraph of the Overview statement for Kororāreka Russell Heritage Area Overlay as follows: Development in the second half of the 20th century has been limited <b>and generally of a small scale</b> , so that Kororāreka Russell retains a high degree of historic heritage integrity and context, which is significant at the regional and national level.
John Andrew Riddell (S431)	S431.052	Heritage area overlays	Overview	Not Stated	The overview to the Heritage Area Overlays chapter include several notable omissions in terms of history, values and characteristics.	Amend the first sentence of the Overview statement for Part D of the Kororāreka Russell Heritage Area Overlay as follows: Covers the remainder of the Kororāreka Russell Heritage Area Overlay and reflects the original street layout and subdivision patterns <b>and the modest scale of buildings and development.</b> <del>and</del> It contains archaeological sites ....
John Andrew Riddell (S431)	S431.053	Heritage area overlays	Overview	Not Stated	The overview to the Heritage Area Overlays chapter include several notable omissions in terms of history, values and characteristics.	Insert a further sentence at the end of the Overview statement for Part D of the Kororāreka Russell Heritage Area Overlay as follows: <b>Part D is also important as context and</b>

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						<b>backdrop for the other parts of the Kororāreka Russell Historic Heritage Area Overlay, and in providing the setting for the land entrance to Kororāreka/Russell</b>
<b>John Andrew Riddell (S431)</b>	S431.054	Heritage area overlays	Overview	Not Stated	The overview to the Heritage Area Overlays chapter include several notable omissions in terms of history, values and characteristics.	Amend the Overview statement for the Paihia Heritage Area Overlay to identify the large water setback as an historic heritage characteristic
<b>Michael Foy (S472)</b>	S472.012	Heritage area overlays	Overview	Oppose	We do not support the new heritage overlays at Mangonui, and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui.	Delete from the Overview the text relating to Mangonui and Rangitoto Peninsula Heritage Area Part B
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.005	Heritage area overlays	Objective for all Heritage Area overlays	Support	The Proposed Plan is required to recognise and provide for the matters of national importance, in particular 6(f) "the protection of historic heritage from inappropriate subdivision, use and development" and s6(e) "the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga." HNZPT considers that the hybrid-plan format of the Proposed Plan, that includes: the identification of historic heritage; heritage area overlays; Kororareka Russell Township Zone and Sites and Areas of Significance to Maori issues (Overview), objectives, policies and rules each within a Section of the plan, is of assistance to the reader in understanding the background and reasons for the rules.	Retain the objectives for all heritage area overlays
<b>Heather Adams and Duncan Ross (S545)</b>	S545.003	Heritage area overlays	Objective for all Heritage Area overlays	Support in part	We strongly support the concept of protecting the unique heritage values, context and landscape of Te Waimate Heritage Area, however we believe that the proposed plan does not go far enough to protect the outstanding landscape and heritage values of the area. Heritage sites	Amend provisions to provide better protection of poorly detailed local sites to preserve them until they are properly investigated and this protection should not be over ridden by Rural Production rules. Amend provisions so that large



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					have been left out of the plan, such as Cooks Lane, Courthouse Lane and the second site of the flour mill. These sites reinforce the uniqueness of the area. we have grave concerns for what is left of the pastoral landscape, particularly the vista from the Mission House. Already much of the 'notable attempt by the missionaries to recreate an English pastoral landscape' has been recently destroyed, the removal of the hedge rows, trees, a huge amount of soil being moved about, and replaced with overwhelming horticultural development.	horticultural structure that obliterate the Mission and pre European horticultural sites be restricted. (Inferred)
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.050	Heritage area overlays	HA-O1	Support	not stated	Retain HA-O1 as notified
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.098	Heritage area overlays	HA-O1	Support in part	Objective HA-O1 as currently worded is inconsistent with section 6(f) of the Resource Management Act 1991 which provides for the protection of historic heritage from inappropriate subdivision, use and development. The absolute protection proposed by the objective is inconsistent with the Act and does not promote the purpose of the Act. The current wording implies that the Council has picked one aspect as an outright winner to the detriment of other, lawfully established, and existing activities.	Amend objective HA-O1 as follows: The heritage values of Heritage Area Overlays, as derived from the sites, buildings and objects of historic significance, archaeological sites and landform, are identified and protected <b>from inappropriate subdivision, use, and development.</b>
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.006	Heritage area overlays	Policy for all Heritage Area overlays	Support	The Proposed Plan is required to recognise and provide for the matters of national importance, in particular 6(f) "the protection of historic heritage from inappropriate subdivision, use and development" and s6(e) "the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga." HNZPT considers that the hybrid-plan format of the Proposed Plan, that includes: the identification of historic heritage; heritage area overlays; Kororareka Russell Township Zone and Sites and Areas of Significance to	Retain the policies for all heritage area overlays

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					Maori issues (Overview), objectives, policies and rules each within a Section of the plan, is of assistance to the reader in understanding the background and reasons for the rules.	
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.051	Heritage area overlays	HA-P1	Support	not stated	Retain HA-P1 as notified
<b>Horticulture New Zealand (S159)</b>	S159.045	Heritage area overlays	HA-P2	Support in part	The Kerikeri Heritage area overlay does include some areas which are part of rural production. Such activities should be able to continue while maintaining the integrity of the Heritage Overlay area	Amend Policy HA-P2 to include: <b>c) providing for existing activities in the overlay area</b>
<b>Russell Protection Society (INC) (S179)</b>	S179.041	Heritage area overlays	Policies for Kororareka Russell Heritage area overlay	Support		Retain policies for the Kororareka Russell heritage Overlay Areas including Part A- The stand, Part B- Wellington street, Part C - Christ Church and Part D - remainder
<b>John Andrew Riddell (S431)</b>	S431.055	Heritage area overlays	HA-P6	Not Stated	Not stated	Amend point a. of Policy HA-P6 as follows: a. maintaining the architecture and integrity of the built form within Part A The Strand, recognising the use of verandah, roof forms and materials <b>and the lack of ornamentation</b> that reflect an earlier architectural style  Insert new point i. in Policy HA-P6 as follows: <b>i. recognising the importance of Part D, with its modest scale of development, in providing the heritage and village setting for the land entrance to Kororareka/Russell and for the backdrop to Part A</b>

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						<b>The Strand, Part B Wellington Street, and Part C, Christchurch.</b>
<b>James Conner (S13)</b>	S13.002	Heritage area overlays	Policies for Mangonui and Rangitoto Peninsula Heritage area overlay	Support	<p>Heritage Area Overlay: Mangōnui and Rangitoto Peninsula Heritage Area Overlay:</p> <ul style="list-style-type: none"> <li>- My property, which borders the unformed road connecting Alexander Street, Mill Bay Road, and Richmond Road falls under the Part B heritage area, which I welcome and support.</li> <li>- My property shares a strong visual connection and historical, cultural, and indigenous biodiverse context to the Rangikapiti and Rangitoto pā sites, terraces, and peninsulas, as well as the Mangonui Township, Oruaiti River, and Paewhenua Island.</li> <li>- Whilst the two pā sites guard the harbour mouth, Rangikapiti also provided defence against potential raids via land from the South and West, and provided a gateway to inland Mangonui trail routes, connecting to Māori Point and beyond. For this reason, I welcome the Council's acknowledgment of the need to contextually link the Part A and Part B heritage areas.</li> <li>- In this respect, I support the protection of the unformed road network connecting Alexander St, Mill Bay Road and Richmond Road for their beautifying, indigenous biodiversity, green belt, and heritage value and their connection to whenua and significant historical sites and events. This will ensure the connection of tangata whenua and the long term protection of the heritage area overlay areas and environment for future generations</li> </ul>	No changes requested

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<b>Hinemoa Conner (S14)</b>	S14.002	Heritage area overlays	Policies for Mangonui and Rangitoto Peninsula Heritage area overlay	Support	<p>Heritage Area Overlay: Mangōnui and Rangitoto Peninsula Heritage Area Overlay: My property, which borders the unformed road connecting Alexander Street, Mill Bay Road, and Richmond Road falls under the Part B heritage area, which I welcome and support.</p> <p>My property shares a strong visual connection and historical, cultural, and indigenous biodiverse context to the Rangikapiti and Rangitoto pā sites, terraces, and peninsulas, as well as the Mangonui Township, Oruaiti River, and Paewhenua Island.</p> <p>Whilst the two pā sites guard the harbour mouth, Rangikapiti also provided defence against potential raids via land from the South and West and provided a gateway to inland Mangonui trail routes, connecting to Māori Point and beyond. For this reason, I welcome the Council's acknowledgment of the need to contextually link the Part A and Part B heritage areas.</p> <p>In this respect, I support the protection of the unformed road network connecting Alexander St, Mill Bay Road and Richmond Road for their beautifying, indigenous biodiversity, green belt, and heritage value and their connection to whenua and significant historical sites and events. This will ensure the connection of tangata whenua and the long term protection of the heritage area overlay areas and environment for future generations.</p>	No change required
<b>Te Hiku Community Board (S257)</b>	S257.013	Heritage area overlays	HA-P9	Oppose	We do not support the new heritage overlays at Mangonui and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui.	Delete policy HA-P9, relating to Mangōnui and Rangitoto Peninsula Heritage Area Part B
<b>Sean Frieling (S357)</b>	S357.013	Heritage area overlays	HA-P9	Oppose	Do not support the new heritage overlays at Mangonui, and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui.	Delete policy HA-P9, relating to Mangōnui and Rangitoto Peninsula Heritage Area Part B

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<b>Leah Frieling (S358)</b>	S358.013	Heritage area overlays	HA-P9	Oppose	We do not support the new heritage overlays at Mangonui, and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui	Delete policy HA-P9, relating to Mangōnuī and Rangitoto Peninsula Heritage Area Part B
<b>Michael Foy (S472)</b>	S472.013	Heritage area overlays	HA-P9	Oppose	We do not support the new heritage overlays at Mangonui, and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui	Delete policy HA-P9, relating to Mangōnuī and Rangitoto Peninsula Heritage Area Part B
<b>Alec Jack (S277)</b>	S277.005	Heritage area overlays	Policies for Pouerua Heritage area overlay	Support in part	The rules regarding the Pouerua Heritage area are too restrictive due to the fact that such large areas within the Pouerua Heritage area are devoid of heritage.	Insert policies and rules to the plan to introduce Tradable Development Rights to compensate landowners for land uses and activities which the Heritage Area rules affect within the area.
<b>Ngati Rangi ki Ngawha Hapu (S304)</b>	S304.007	Heritage area overlays	Policies for Pouerua Heritage area overlay	Support in part	Ngati Rangi should be included as Tangata whenua in regards to Pouerua and is should be consulted and engaged with any activities, overlays, data, and information.	Amend so that Ngati Rangi is included as Tangata whenua in regards to Pouerua and is consulted and engaged with any activities, overlays, data, and information.
<b>Horticulture New Zealand (S159)</b>	S159.046	Heritage area overlays	HA-P12	Support in part	The Pouerua Heritage area overlay does include some areas which are part of rural production. Such activities should be able to continue while maintaining the integrity of the Heritage Overlay area	Amend HA-P12 to include: <b>c) providing for existing activities in the overlay area</b>
<b>Alec Jack (S277)</b>	S277.003	Heritage area overlays	HA-P12	Oppose	Not enough is known about the "historical drywall boundaries which reflect early rural subdivisions". The rockwalls look nice but are not necessarily historic. Our family has built many dry walls. I oppose the notion that these fences can be used to impose restrictions on our land use. I oppose this policy.	Amend policy HA-P12 as follows 'To maintain the integrity of the Pouerua Heritage area overlay and protect the heritage values by: recognising that Pouerua sits within a rural farming landscape with numerous Māori stone field systems, <del>and historical drywall boundaries</del> which reflect early rural subdivisions;'
<b>Alec Jack (S277)</b>	S277.004	Heritage area overlays	HA-P13	Support in part	I support the enabling of subdivision within the Pouerua Heritage area. The decision I want from FNDC is to enable subdivision on a case by case basis because there are vast areas within the proposed Pouerua Heritage area devoid of any heritage values - a blanket policy or rule which constrains well	Amend HA-P13 to clarify that it also enables subdivisions and land use that make no difference to the cultural and heritage values of the area.

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					placed subdivision is an unreasonable financial burden on the land owner.	
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.100	Heritage area overlays	HA-P13	Support in part	Policy HA-P13 should be amended to achieve consistency with s6(f) of the Resource Management Act 1991 by referring to protection from inappropriate subdivision, use and development. The amendment would provide additional clarity to landowners who have properties within the overlay.	Amend Policy HA-P13 as follows: To enable <b>farming</b> (inferred), subdivision and land use which recognises and protects the cultural and heritage values of Pouerua, and their strong connections and context of Pouerua scoria cone, Ohaewai volcanic field and Ngahuha scoria cone <b>from inappropriate subdivision, use, and development.</b>
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.033	Heritage area overlays	HA-P14	Support	The HNZPT non-statutory Sustainable Management of Historic Heritage Guidance Series: Guide to the Management of Historic Heritage: District Plans (April 2022) recommends demolition or full destruction of a protected part of scheduled historic heritage should have at least non-complying status for the most significant heritage and discretionary activity status for other heritage. Prohibited Activity status for the Demolition or relocation of the listed scheduled Heritage Resources given their significance and national importance is appropriate.	Retain Rule HA-R14
<b>Horticulture New Zealand (S159)</b>	S159.047	Heritage area overlays	HA-P16	Support in part	The Te Waimate Heritage area overlay does include some areas which are part of rural production. Such activities should be able to continue while maintaining the integrity of the Heritage Overlay area	Amend HA-P16 to include: <b>c) providing for existing activities in the overlay area</b>
<b>Heather Adams and Duncan Ross (S545)</b>	S545.002	Heritage area overlays	HA-P16	Support in part	We strongly support the concept of protecting the unique heritage values, context and landscape of Te Waimate Heritage Area, however we believe that the	Amend the provisions to better protect local sites to preservethem until they are properly investigated and this protection should not be over ridden

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					proposed plan does not go far enough to protect the outstanding landscape and heritage values of the area. Heritage sites have been left out of the plan, such as Cooks Lane, Courthouse Lane and the second site of the flour mill. These sites reinforce the uniqueness of the area. we have grave concerns for what is left of the pastoral landscape, particularly the vista from the Mission House. Already much of the 'notable attempt by the missionaries to recreate an English pastoral landscape' has been recently destroyed, the removal of the hedge rows, trees, a huge amount of soil being moved about, and replaced with overwhelming horticultural development.	by Rural Production rules (inferred) Amend the provisions to restrict large horticultural structures that obliterate the Mission and pre European horticultural sites (inferred)
<b>Bayswater Inn Ltd (S29)</b>	S29.004	Heritage area overlays	Rules	Oppose	40 Marsden Road, Paihia, should retain the provisions of the Operative District Plan that were imposed following an appeal to the Environment Court 2005/2006. The new provisions in the Proposed District Plan should not apply. Heritage Overlay - Paihia Heritage Area - Part B. The PDP is now applying new rules and other provisions and standards that do not currently apply to the property.	Amend to clarify if the reference to 'heritage resource' would require the measurement to be taken from the heritage building or structure (for example the church next to 40 Marsden Road, Paihia) or the property boundary.
<b>Cinna Smith (S73)</b>	S73.002	Heritage area overlays	Rules	Support in part	Welcome any measures to better protect the outstanding heritage values of Te Waimate and support the proposed change to the boundary area. However, the boundary area needs to be further extended to protect Te Waimate's open, pastoral vistas and other heritage landmarks that are currently excluded. The current draft does not adequately protect the landscape from undue development or change of land use. Unchecked development has ruined so much in Te Waimate in the past decade and the features that make Te Waimate unique and a taonga of national, and international, importance will soon be gone forever.	Amend to recognise and protect the view shafts in Te Waimate, as they were under the old 'special zone' in the former plan.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Horticulture New Zealand (S159)</b>	S159.048	Heritage area overlays	Rules	Not Stated	Rule HA-R11 states that activities not otherwise listed in this chapter are discretionary activities. Rural production activities are not listed as a specific activity so need to be provided for as a permitted activity	Insert a new rule: <b>HA-RXRural production activitiesActivity status: Permitted All zones and heritage overlays</b>
<b>Russell Protection Society (INC) (S179)</b>	S179.042	Heritage area overlays	Rules	Support in part	we ask that the existing rules or standard on parking and access, signage and visible building on the stand, which are entirely consistent with the proposed objectives and policies, be incorporated in the relevant HAR or HAS Part A The Strand section of the PDP. parking, access, signposting and new buildings have the potential to easily detract from what is a national significant heritage area.	Amend to ensure key controls in the Operative plan are included such as 12.5A.6.1.3 Parking and access in the strand 12.5A.6.1.2 Signs in the strand and kerikeri Basin heritage precincts 12.5A6.2.3 New buildings which are not visible to the public
<b>Kay Brenda Davidson (S225)</b>	S225.001	Heritage area overlays	Rules	Oppose	I do NOT support the new heritage area's in Mangonui and Rangitoto Peninsula and submit there should be no restrictive rules outside the existing heritage areas, due to adverse effects on property rights when proposing subdivisions, earthworks and buildings, nor should there be any expectations to meet with Tangata Whenua in an already extensively modified area. Plan Heritages report NO 2 did not evaluate the economic impact of the extended area.	delete restrictive rules outside the existing heritage areas
<b>Kay Brenda Davidson (S225)</b>	S225.002	Heritage area overlays	Rules	Oppose	I do NOT support the new heritage area's in Mangonui and Rangitoto Peninsula and submit there should be no restrictive rules outside the existing heritage areas, due to adverse effects on property rights when proposing subdivisions, earthworks and buildings, nor should there be any expectations to meet with Tangata Whenua in an already extensively modified area. Plan Heritages report NO 2 did not evaluate the economic impact of the extended area.	delete matters of discretion around meeting with tangata whenua in rules (inferred)
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.052	Heritage area overlays	Rules	Support in part	Spelling area throughout rules... "alternation" rather than "alteration". This needs to be corrected.	Amend to correct spelling error



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.007	Heritage area overlays	Rules	Support	The Proposed Plan is required to recognise and provide for the matters of national importance, in particular 6(f) "the protection of historic heritage from inappropriate subdivision, use and development" and s6(e) "the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga." HNZPT considers that the hybrid-plan format of the Proposed Plan, that includes: the identification of historic heritage; heritage area overlays; Kororareka Russell Township Zone and Sites and Areas of Significance to Maori issues (Overview), objectives, policies and rules each within a Section of the plan, is of assistance to the reader in understanding the background and reasons for the rules.	Retain the rules for all heritage area overlays
<b>John Andrew Riddell (S431)</b>	S431.062	Heritage area overlays	Rules	Not Stated	In general the heritage area provisions in the operative Plan comprehensively address the protection of historic heritage and character and there are no sound resource management reasons why the provisions cannot be carried over into the proposed Plan largely without alteration.	Insert new standard HA-S4 in the Heritage Area Overlay rules applying to the Kororāreka Russell Heritage Overlay Area: <b>HA-S4 Building or Structure Coverage</b> <b>The maximum combined net floor area of all buildings or structures on the site is no more than 20% of the net site area.</b> <b>Where the standard is not met, matters of discretion are restricted to:</b> <b>a. the size, location and design of open space;</b> <b>b. the character and amenity of the surrounding area;</b> <b>c. the extent that screening, planting and landscaping are utilised for mitigating adverse effects;</b> <b>d. cultural and historic heritage values;</b> <b>e. the extent of</b>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p><b>building area and the scale of the building and the extent to which they are compatible with both the built and natural environments in the vicinity;f. consistency with the Kororāreka/Russell Design Guidelines Subdivision</b></p>
<p><b>Top Energy Limited (S483)</b></p>	<p>S483.123</p>	<p>Heritage area overlays</p>	<p>Rules</p>	<p>Not Stated</p>	<p>Top Energy supports enablement of infrastructure and renewable energy generation activities, and associated buildings and structures in all Heritage Overlays but find this rule confusing as the rules in this chapter otherwise relate to buildings and structures, or earthworks, suggesting this overlay only manages effects, not activities. However R6 states 'activity' in the rule, and R-11 results in a discretionary activity status for all activities not otherwise listed in the Chapter, meaning that even residential activities would be discretionary in all Heritage Overlays. Accordingly, Top Energy seeks clarification and certainty that existing and new network utility building and structures are appropriately provided for. This would provide clear alignment with RPS direction.</p>	<p>Insert a new permitted activity rule for the maintenance, upgrade, repair of existing network utilities building and structures in all Heritage Area Overlays.</p>
<p><b>Top Energy Limited (S483)</b></p>	<p>S483.124</p>	<p>Heritage area overlays</p>	<p>Rules</p>	<p>Not Stated</p>	<p>Top Energy supports enablement of infrastructure and renewable energy generation activities, and associated buildings and structures in all Heritage Overlays but find this rule confusing as the rules in this chapter otherwise relate to buildings and structures, or earthworks, suggesting this overlay only manages</p>	<p>Insert a new permitted activity rule for new network utilities in all Heritage Area Overlays.</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					effects, not activities. However R6 states 'activity' in the rule, and R-11 results in a discretionary activity status for all activities not otherwise listed in the Chapter, meaning that even residential activities would be discretionary in all Heritage Overlays. Accordingly, Top Energy seeks clarification and certainty that existing and new network utility building and structures are appropriately provided for. This would provide clear alignment with RPS direction.	
<b>Ngati Rangi ki Ngawha (S515)</b>	S515.012	Heritage area overlays	Rules	Support in part	Ngati Rangi should be included as Tangata whenua in regards to Pouerua and is should be consulted and engaged with any activities, overlays, data, and information.	Amend so that Ngati Rangi is included as Tangata whenua in regards to Pouerua and is consulted and engaged with any activities, overlays, data, and information.
<b>Heather Adams and Duncan Ross (S545)</b>	S545.004	Heritage area overlays	Rules	Support in part	We strongly support the concept of protecting the unique heritage values, context and landscape of Te Waimate Heritage Area, however we believe that the proposed plan does not go far enough to protect the outstanding landscape and heritage values of the area. Heritage sites have been left out of the plan, such as Cooks Lane, Courthouse Lane and the second site of the flour mill. These sites reinforce the uniqueness of the area. we have grave concerns for what is left of the pastoral landscape, particularly the vista from the Mission House. Already much of the 'notable attempt by the missionaries to recreate an English pastoral landscape' has been recently destroyed, the removal of the hedge rows, trees, a huge amount of soil being moved about, and replaced with overwhelming horticultural development.	Amend the provisions to better protect local sites to preserve them until they are properly investigated and this protection should not be over ridden by Rural Production rules (inferred) Amend the provisions to restrict large horticultural structures that obliterate the Mission and pre European horticultural sites (inferred)
<b>Alec Jack (S277)</b>	S277.008	Heritage area overlays	HA-R1	Oppose	I oppose any form of restriction on the basis of heritage regarding the maintenance & repair of our buildings and structures within the proposed Pouerua Heritage area. They have no heritage value and any such	Amend rule HA-R1 so that there is no restriction on maintenance and repair of buildings or structures that have no heritage value.

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					restrictions on their repairs and maintenance therefore incur additional cost without the intended gain for heritage.	
<b>Foodstuffs North Island Limited (S363)</b>	S363.013	Heritage area overlays	HA-R1	Not Stated	The submitter considers that rule HA-R1 Maintenance and repair of buildings or structures, means that any redevelopment of the Russell Four Square building within The Strand Precinct site is likely to require resource consent as a discretionary activity and that this is onerous when the scope of potential effects is limited and well understood, a restricted discretionary activity default is supported.	Amend rule HA-R1 Maintenance and repair of buildings or structures, to provide for the activity as a restricted discretionary activity status, within the Kororareka Russell Heritage Area overlay.
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.031	Heritage area overlays	HA-R1	Support in part	Rules to recognise the importance of Dry Stone Walls within the Heritage area overlays would be appropriate as proposed for the Historic Heritage chapter.	Insert new PER-3 in Rule HA-R1 as follows (or words to that effect): <b>PER-3 Works are to existing dry stone walls and are for:</b> <b>i Maintenance or repair works in situ using traditional methods, design and materials.</b> <b>ii. Removal of up to a total of 6m length of wall per site for access purposes only, where no alternative access exists.</b> Activity status where compliance not achieved with PER-1, <del>or</del> PER-2 or <b>PER-3</b> : Restricted discretionary
<b>John Andrew Riddell (S431)</b>	S431.056	Heritage area overlays	HA-R1	Not Stated	The provisions in the proposed Plan are more onerous than is necessary to protect the heritage values and character of the Kororareka Russell Heritage Area Overlay Part D. This is inappropriate and contrary to policy 6.1.1 of the Regional Policy Statement.	Amend PER-2 of Rule HA-R1 so that it does not apply to Part D of the Kororāreka Russell Heritage Overlay
<b>Heritage New Zealand Pouhere</b>	S570.001	Heritage area overlays	HA-R1	Support in part	The plan provisions as notified promulgate an inconsistent set of rules with regards to the Heritage Colours standard HA-S2 which	Amend HA-R1 to improve consistency between PER-1 which applies HA-S2 to all heritage areas, and PER-2

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<b>Taonga (S570)</b>					applies to all nine heritage areas. There is an inconsistency within HA-R1 in that PER-1 applies HA-S2 to all heritage areas, whereas PER-2 applies the standard to Kororāreka Russell only.	which only applies HA-S2 to Kororāreka Russell.
<b>Bayswater Inn Ltd (S29)</b>	S29.001	Heritage area overlays	HA-R2	Oppose	40 Marsden Road, Paihia, should retain the provisions of the Operative District Plan that were imposed following an appeal to the Environment Court 2005/2006. The new provisions in the Proposed District Plan should not apply. Heritage Overlay - Paihia Heritage Area - Part B. The PDP is now applying new rules and other provisions and standards that do not currently apply to the property.	Amend HA-R2 as it applies to 40 Marsden Road, Paihia. It should not apply as the rule is unworkable given the size and shape of the property.
<b>Te Hiku Community Board (S257)</b>	S257.014	Heritage area overlays	HA-R2	Oppose	We do not support the new heritage overlays at Mangonui and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui.	Amend rule HA-R2 by deleting reference to Mangōnuī and Rangitoto Peninsula Heritage Area Part B
<b>Alec Jack (S277)</b>	S277.009	Heritage area overlays	HA-R2	Oppose	I oppose any form of restriction on the basis of heritage regarding additions or alterations to our existing buildings and structures within the Proposed Heritage area. They have no heritage value and any such restrictions therefore incur additional cost without the intended gain for heritage.	Amend rule HA-R2 so that there is no restriction on additions and alterations to existing buildings or structures that have no heritage value.
<b>Sean Frieling (S357)</b>	S357.014	Heritage area overlays	HA-R2	Oppose	Do not support the new heritage overlays at Mangonui, and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui.	Amend rule HA-R2 by deleting reference to Mangōnuī and Rangitoto Peninsula Heritage Area Part B
<b>Leah Frieling (S358)</b>	S358.014	Heritage area overlays	HA-R2	Oppose	We do not support the new heritage overlays at Mangonui, and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui.	Amend rule HA-R2 by deleting reference to Mangōnuī and Rangitoto Peninsula Heritage Area Part B
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.101	Heritage area overlays	HA-R2	Support in part	It is important to ensure that the rules and associated performance standards imposed are relevant to those areas which need protection from inappropriate subdivision, use and development. Performance standard PER-6 is not relevant to the protection of a heritage area overlay it is focused on an addition or alteration to a scheduled heritage	Delete PER-6 from Rule HA-R2

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					resource not being visible from a public area. This has the potential to impede the restoration of a heritage resource which is visible from a public space	
<b>John Andrew Riddell (S431)</b>	S431.057	Heritage area overlays	HA-R2	Not Stated	In general the heritage area provisions in the operative Plan comprehensively address the protection of historic heritage and character and there are no sound resource management reasons why the provisions cannot be carried over into the proposed Plan largely without alteration.	Insert additional statement within Rule HA-R2 that Rule HA-S2 does not apply to Part D of the Kororāreka Russell Heritage Overlay. Insert new standard HA-S4 Building or Structure Coverage within PER-3 of Rule HA-R2 as per the following: <b>HA-S4 Building or Structure Coverage</b> <b>The maximum combined net floor area of all buildings or structures on the site is no more than 20% of the net site area.</b> Where the standard is not met, matters of discretion are restricted to: <b>a. the size, location and design of open space;b. the character and amenity of the surrounding area;c. the extent that screening, planting and landscaping are utilised for mitigating adverse effects;d. cultural and historic heritage values;e. the extent of building area and the scale of the building and the extent to which they are compatible with both the built and natural environments in the vicinity;f. consistency with the Kororāreka/Russell Design Guidelines</b>

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<b>Michael Foy (S472)</b>	S472.014	Heritage area overlays	HA-R2	Oppose	We do not support the new heritage overlays at Mangonui, and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui	Amend rule HA-R2 by deleting reference to Mangōnui and Rangitoto Peninsula Heritage Area Part B
<b>David Truscott (S476)</b>	S476.003	Heritage area overlays	HA-R2	Oppose	The purpose of the colour control is unclear. The low reflectivity of the CE colours is contradicted by the other colour charts eg the heritage chart includes bright red which is highly visible in distant views. Council does not require consent in practice for a change of colour where consent is not required for other work. The DP does not state this. The DP does not indicate what the rule is intended to achieve.	Delete Heritage PER-2 (rule HA-R2 inferred) and HA-S2 standards. Policy should promote colour as a character forming townscape element to created a lively, attractive enviroment. This generates tourism that benefits the local economy.
<b>Heritage New Zealand Pouhere Taonga (S570)</b>	S570.002	Heritage area overlays	HA-R2	Support in part	The plan provisions as notified promulgate an inconsistent set of rules with regards to the Heritage Colours standard HA-S2 which applies to all nine heritage areas. HA-R2 lists eight different heritage areas (or parts thereof), with the rule requiring restricted discretionary consent for additions or alterations of buildings in these areas which do not comply with the heritage colour standard. This is inconsistent with how HA-S2 is applied across other rules in the chapter.	Amend HA-R2 to improve consistency and clarity of the application of HA-S2 across heritage areas.
<b>Fire and Emergency New Zealand (S512)</b>	S512.025	Heritage area overlays	HA-R3	Support	Fire and Emergency support enabling fire protection for heritage resource.	retain HA-R3
<b>Bayswater Inn Ltd (S29)</b>	S29.002	Heritage area overlays	HA-R4	Oppose	40 Marsden Road, Paihia, should retain the provisions of the Operative District Plan that were imposed following an appeal to the Environment Court 2005/2006. The new provisions in the Proposed District Plan should not apply. Heritage Overlay - Paihia Heritage Area - Part B. The PDP is now applying new rules and other provisions and standards that do not currently apply to the property.	Amend HA-R4 as it applies to 40 Marsden Road, Paihia. The rule should not apply as it cannot be achieved.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Te Hiku Community Board (S257)</b>	S257.015	Heritage area overlays	HA-R4	Oppose	We do not support the new heritage overlays at Mangonui and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui.	Amend rule HA-R4 by deleting reference to Mangōnui and Rangitoto Peninsula Heritage Area Part B
<b>Alec Jack (S277)</b>	S277.010	Heritage area overlays	HA-R4	Oppose	I oppose the additional layer of bureaucracy which the Heritage area zone introduces to establishing new buildings or structures within the Pouerua Heritage area - this represents a substantial and unreasonable devaluation of land use, which will have financial implications for my intergenerational family business's equity and debt serviceability. I am concerned about my ability to provide housing for staff - especially as Climate Change legislation forces a change in land use from extensive ruminant agriculture into more intensive land use such as horticulture which requires more housing for staff.	Amend rule HA-R4 so that there is no restriction on new buildings or structures that have no impact on heritage or landscape values.
<b>Sean Frieling (S357)</b>	S357.015	Heritage area overlays	HA-R4	Oppose	Do not support the new heritage overlays at Mangonui, and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui.	Amend rule HA-R4 by deleting reference to Mangōnui and Rangitoto Peninsula Heritage Area Part B
<b>Leah Frieling (S358)</b>	S358.015	Heritage area overlays	HA-R4	Oppose	We do not support the new heritage overlays at Mangonui, and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui	Amend rule HA-R4 by deleting reference to Mangōnui and Rangitoto Peninsula Heritage Area Part B
<b>John Andrew Riddell (S431)</b>	S431.058	Heritage area overlays	HA-R4	Not Stated	Policies are not given effect to in the rules. An example is policy HA-P2 is not given effect to in the rules because buildings and structures in Part B of the Kerikeri Heritage Area Overlay are provided for as a permitted activity. This is in contrast to the restricted discretionary status for such structures and buildings in the operative Plan.	Delete the reference to Kerikeri - Part B from rule HA-R4, and insert the reference within the Rule HA-R8
<b>John Andrew Riddell (S431)</b>	S431.060	Heritage area overlays	HA-R4	Not Stated	Not stated	Insert a reference to Kororāreka Russell Part D in permitted activity rule HA-R4, and insert the following performance standard PER-3 within the rule: <b>PER-3 The building or structure complies with HA-S4</b>



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<b>Building or Structure Coverage.</b>
<b>Michael Foy (S472)</b>	S472.015	Heritage area overlays	HA-R4	Oppose	We do not support the new heritage overlays at Mangonui, and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui	Amend rule HA-R4 by deleting reference to Mangōnui and Rangitoto Peninsula Heritage Area Part B
<b>Russell Protection Society (INC) (S179)</b>	S179.109	Heritage area overlays	HA-R5	Not Stated	we question whether the 200m3 of earthworks (PER-2) provided for in parts of B,C,D of the Kororareka Russell Heritage Overlay areas may be too generous given the proposed rules for the coastal environment overlay (CE-S3)	Amend HA-R5 PER-2 (whole rule inferred) as required to ensure consistency with CE-S3
<b>Te Hiku Community Board (S257)</b>	S257.016	Heritage area overlays	HA-R5	Oppose	We do not support the new heritage overlays at Mangonui and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui.	Amend rule HA-R5 by deleting reference to Mangōnui and Rangitoto Peninsula Heritage Area Part B
<b>Alec Jack (S277)</b>	S277.011	Heritage area overlays	HA-R5	Oppose	With so much area devoid of heritage, it is unreasonable to apply additional compliance cost regarding earthworks within the Pouerua Heritage area.	Amend rule HA-R5 to remove controls on earthworks within 20m of a scheduled Heritage Resource.
<b>Sean Frieling (S357)</b>	S357.016	Heritage area overlays	HA-R5	Oppose	Do not support the new heritage overlays at Mangonui, and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui.	Amend rule HA-R5 by deleting reference to Mangōnui and Rangitoto Peninsula Heritage Area Part B
<b>Leah Frieling (S358)</b>	S358.016	Heritage area overlays	HA-R5	Oppose	We do not support the new heritage overlays at Mangonui, and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui	Amend rule HA-R5 by deleting reference to Mangōnui and Rangitoto Peninsula Heritage Area Part B
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.032	Heritage area overlays	HA-R5	Support	Rule HA-R5 is problematic where there is an archaeological site within the Heritage Area overlays. Rule HA-R5 permitted activity Rules Per-1, PER-2 and PER-3 have 2m <sup>3</sup> , 5m <sup>2</sup> and 200m <sup>3</sup> thresholds. However, it is acknowledged that even small excavations can have large impacts on archaeology. The permitted activity rules rely upon Standard HA-S3 Accidental Discovery Protocol. For consistency purposes, Rules HA-R5 PER-1, PER-2 and PER-3 should also refer to the setback distance from an	That Rule HA-R5 be amended as follows (or words to that effect): PER-1 The earthworks: <ul style="list-style-type: none"> <li>1. comply with the relevant permitted activity rules within the Earthworks chapter</li> <li>2. are not within 20m of a scheduled Heritage Resource <b>or an archaeological site.</b></li> </ul>

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					archaeological site and not just a scheduled heritage resource.	<p>PER-2The earthworks:</p> <ol style="list-style-type: none"> <li>1. do not exceed 2m<sup>3</sup> in volume over an area of 5m<sup>2</sup> ;</li> <li>2. <del>is</del> <b>are</b> not within 20m of a scheduled Heritage Resource <b>or of an archaeological site;</b></li> <li>3. <del>complies</del> <b>Comply</b> with standard HA-S3 Accidental Discovery Protocol.</li> </ol> <p>PER-3 The earthworks</p> <ol style="list-style-type: none"> <li>1. do not exceed <del>200</del>m<sup>3</sup></li> <li>2. are not within 20m of a scheduled Heritage Resource <b>or an archaeological site;</b></li> <li>3. <del>complies</del> <b>Comply</b> with HA-S3 Accidental Discovery Protocol.</li> </ol> <p><b>Note: In addition to the requirements the District Plan, it should be noted that the Heritage New Zealand Pouhere Taonga Act 2014 ("HNZPTA") requires all applicants to obtain an authority from the HNZPTA before any archaeological site is modified or destroyed. This is the case regardless of whether the land on which the site is</b></p>

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						<b>located is designated or the activity is permitted under the District Plan or a resource or building consent has been granted.</b>
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.102	Heritage area overlays	HA-R5	Not Stated	This rule deals with the issue of earthworks within heritage area overlays. Federated Farmers seeks the inclusion of ancillary rural earthworks as a permitted activity in this rule. It is important that the existing and legal operations of landowners are provided for moving forward. The inclusion of ancillary rural earthworks will ensure that necessary works can be undertaken by landowners which have occurred within the areas as permitted activities for generations. Such activities include but are not limited to: <ul style="list-style-type: none"> <li>- tilling or cultivation of soil for the establishment and maintenance of crops and pasture;</li> <li>- the harvesting of crops;</li> <li>- the planting and removal of trees;</li> <li>- horticultural root ripping;</li> <li>- digging offal pits, burying dead stock and plant waste;</li> <li>- the digging of post holes and the drilling of bores;</li> <li>- installing and maintaining services such as water pipes and troughs.</li> </ul>	Insert an additional point in Per-1 of Rule HA-R5 as follows (or similar wording that achieves the same intent): <b>3. Are ancillary rural earthworks.</b>
<b>Michael Foy (S472)</b>	S472.016	Heritage area overlays	HA-R5	Oppose	We do not support the new heritage overlays at Mangonui, and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui	Amend rule HA-R5 by deleting reference to Mangōnui and Rangitoto Peninsula Heritage Area Part B
<b>Top Energy Limited (S483)</b>	S483.121	Heritage area overlays	HA-R5	Not Stated	Top Energy seeks amendments to PER-2 and PER-3 to exempt earthworks associated with the undergrounding of cables from the volume and area thresholds. Undergrounding of cables should be encouraged in these visually sensitive	Amend PER -2 and PER-3 of Rule HA-R5 as follows (or to the same effect)  <b>PER-21. The earthworks are associated with new</b>

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					environments, and the thresholds proposed in the PDP as notified will not facilitate this. Given that the earthworks themselves (as underground) will not have any visual or character impact, and the setback is required, exclusion is considered appropriate.	<b>underground network utilities and:</b> <b>a. are not within 20m of a scheduled Heritage Resource;</b> <b>andb. comply with standard HA-S3 Accidental Discovery Protocol.2. For all other earthworks:</b> <del>1-a.</del> do not exceed 2m <sup>3</sup> in volume over an area of 5m <sup>2</sup> <del>2-b.</del> is not within 20m of a scheduled Heritage Resource; <del>3-c.</del> complies with standard HA-S3 Accidental Discovery Protocol.
<b>Te Hiku Community Board (S257)</b>	S257.017	Heritage area overlays	HA-R6	Oppose	We do not support the new heritage overlays at Mangonui and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui.	Amend rule HA-R6 by deleting reference to Mangōnui and Rangitoto Peninsula Heritage Area Part B
<b>Alec Jack (S277)</b>	S277.012	Heritage area overlays	HA-R6	Oppose	This is an additional layer of compliance cost that isn't justified and it reduces our land use options at a time when the ruminant agriculture that predominates in the area is being forced to reduce emissions. The rule may be intended to protect heritage, but it is drafted too widely, because it sterilises development across the whole extent of a large farm containing one heritage resource.	Amend rule HA-R6 to remove controls on renewable electricity generation infrastructure.
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.053	Heritage area overlays	HA-R6	Support	not stated	Retain HA-R6 as notified
<b>Sean Frieling (S357)</b>	S357.017	Heritage area overlays	HA-R6	Oppose	Do not support the new heritage overlays at Mangonui, and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui.	Amend rule HA-R6 by deleting reference to Mangōnui and Rangitoto Peninsula Heritage Area Part B
<b>Leah Frieling (S358)</b>	S358.017	Heritage area overlays	HA-R6	Oppose	We do not support the new heritage overlays at Mangonui, and submit that there should	Amend rule HA-R6 by deleting reference to Mangōnui and Rangitoto

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					not be restrictive rules outside of the existing heritage areas within Mangonui	Peninsula Heritage Area Part B
<b>Michael Foy (S472)</b>	S472.017	Heritage area overlays	HA-R6	Oppose	We do not support the new heritage overlays at Mangonui, and submit that there should not be restrictive rules outside of the existing heritage areas within Mangonui.	Amend rule HA-R6 by deleting reference to Mangōnui and Rangitoto Peninsula Heritage Area Part B
<b>Top Energy Limited (S483)</b>	S483.122	Heritage area overlays	HA-R6	Not Stated	<p>Top Energy supports enablement of infrastructure and renewable energy generation activities, and associated buildings and structures in all Heritage Overlays but find this rule confusing as the rules in this chapter otherwise relate to buildings and structures, or earthworks, suggesting this overlay only manages effects, not activities.</p> <p>However R6 states 'activity' in the rule, and R-11 results in a discretionary activity status for all activities not otherwise listed in the Chapter, meaning that even residential activities would be discretionary in all Heritage Overlays.</p> <p>Accordingly, Top Energy seeks clarification and certainty that existing and new network utility building and structures are appropriately provided for. This would provide clear alignment with RPS direction.</p>	Amend approach taken in Heritage Area Overlay in regards to infrastructure and renewable energy infrastructure as an 'activity'.
<b>Top Energy Limited (S483)</b>	S483.125	Heritage area overlays	HA-R6	Oppose	Top Energy seeks that this rule be deleted, or amended to exclude network utilities.	Delete Rule HA-R6
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.104	Heritage area overlays	HA-R8	Support in part	<p>Federated Farmer has concerns over performance standard RDIS-1 in rule HA-8 and its potential impacts on farm buildings. While supporting the restricted discretionary activity classification for new buildings or structures, we do not support the standard that requires the building or structure not to be visible from a public place. This requirement is particularly concerning as the term 'public place' has not been defined in the proposed district plan.</p> <p>Farm buildings need to be located where they are needed and where it is practical to</p>	<p>Amend Rule HA-R8 to provide for the location of farm buildings where they are needed and where it is practical to locate them.</p> <p>Amend RDIS-1 of Rule HA-R8 to list the public places (such as footpaths) that are captured</p>

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					do so. Council needs to include a definition for the term 'public place' into the proposed district plan. Once this is done, the Council needs to refine performance standard RDIS-1 so that it specifically states what types of public places are relevant for the standard. The standard should relate to public places such as reserves, footpaths and community hubs and specifically excludes public places such as roadsides which are currently captured under the rule.	
<b>John Andrew Riddell (S431)</b>	S431.059	Heritage area overlays	HA-R8	Not Stated	Policies are not given effect to in the rules. An example is policy HA-P2 is not given effect to in the rules because buildings and structures in Part B of the Kerikeri Heritage Area Overlay are provided for as a permitted activity. This is in contrast to the restricted discretionary status for such structures and buildings in the operative Plan.	Delete the reference to Kerikeri - Part B from rule HA-R4, and insert the reference within the Rule HA-R8
<b>John Andrew Riddell (S431)</b>	S431.061	Heritage area overlays	HA-R8	Not Stated	Not stated	Limit the reference to Kororāreka Russell in Rule HA-R8 to Parts A, B and C of the Kororāreka Russell Heritage Overlay Area, and insert standard HA-S4 within RDIS-3 of Rule HA-R8
<b>Heritage New Zealand Pouhere Taonga (S570)</b>	S570.003	Heritage area overlays	HA-R8	Support in part	The plan provisions as notified promulgate an inconsistent set of rules with regards to the Heritage Colours standard HA-S2 which applies to all nine heritage areas. HA-R8 provides that new buildings within heritage areas Kororāreka Russell and Te Waimate must comply with HA-S2.	Amend HA-R8 to improve consistency and clarity of the application of HA-S2 across heritage areas.
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.105	Heritage area overlays	HA-R9	Support in part	Federated Farmers seeks the amendment of the activity status for both rules from discretionary to restricted discretionary. It is felt that a restricted discretionary activity classification is more appropriate. It would still provide the Council with the ability to control the matters that it reserves it discretion over as well as providing certainty for landowners who have property/ties located within the overlays that they can	Amend the activity status in Rule HA-R9 from discretionary to restricted discretionary

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					continue to operate as existing and lawfully established activities.	
<b>Chorus New Zealand Limited, Spark New Zealand Trading Limited, Spark TowerCo Limited, Vodafone New Zealand Limited (S282)</b>	S282.01	Heritage area overlays	HA-R10	Oppose	Given the wide reaching extent of these heritage areas (many of which cover existing urban townships), requiring all infrastructure activities to require resource consent is not in keeping with what would be expected in urban areas.	Amend HA-R10 to align with HA-R6 and allow infrastructure activities to take place within Heritage Area overlays provided they are not located within a site containing a scheduled Heritage resource.
<b>Alec Jack (S277)</b>	S277.013	Heritage area overlays	HA-R10	Oppose	There is no justification for an unlimited discretionary activity consent status to be required in this specialised context, far exceeding the heritage and landform objective as set out in HA-O1.	Amend rules HA-R10 and HA-R11 to remove discretionary activity status. To the extent that any resource consents are required in this context, the consent status should be restricted discretionary, with discretion restricted to effects only on heritage and landscape values.
<b>Alec Jack (S277)</b>	S277.014	Heritage area overlays	HA-R11	Oppose	There is no justification for an unlimited discretionary activity consent status to be required in this specialised context, far exceeding the heritage and landform objective as set out in HA-O1.	Amend rules HA-R10 and HA-R11 to remove discretionary activity status. To the extent that any resource consents are required in this context, the consent status should be restricted discretionary, with discretion restricted to effects only on heritage and landscape values.
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.106	Heritage area overlays	HA-R11	Support in part	Federated Farmers seeks the amendment of the activity status for both rules from discretionary to restricted discretionary. It is felt that a restricted discretionary activity classification is more appropriate. It would still provide the Council with the ability to control the matters that it reserves it discretion over as well as providing certainty for landowners who have property/ties located within the overlays that they can	Amend the activity status in Rule HA-R11 from discretionary to restricted discretionary

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					continue to operate as existing and lawfully established activities.	
<b>Top Energy Limited (S483)</b>	S483.024	Heritage area overlays	HA-R11	Not Stated	<p>Top Energy considers that there is a lack of clarity throughout the PDP in terms of how the Chapters interact with each other, and some consistency.</p> <p>The Overlay chapters are one example and are inconsistent with respect to referencing rules for "activities not otherwise listed". The How the Plan Works chapter includes a statement that indicates some overlays will automatically default to a permitted activity, however resource consent may still be required under other Part 2: District-wide Matters chapters and/or Part 3: Area-Specific chapters (including the underlying zone). Some Chapters include notes which provide some clarity in this regard (e.g. Heritage Overlay) however this isn't consistently applied through the overlays or the District Wide Chapters generally.</p> <p>Some overlays include a catch all 'activities not otherwise specified' activity status (e.g. Treaty Settlement Land Overlay). Some overlays don't.</p> <p>This lack of consistency (coupled with inconsistent terminology) will cause confusion for Plan users and ultimately, impact the integrity of the plan. This is particularly relevant in the Overlay chapters where each Overlay chapter has a different approach to activity status default rules. With specific regard to the permitted activity default, it is noted that this could lead unintentional consequences.</p>	Amend all relevant overlay chapters as necessary to insert rules for "Activities not otherwise listed in this chapter", consistent with zone chapters.
<b>Russell Protection Society (INC) (S179)</b>	S179.043	Heritage area overlays	Standards	Support in part	we ask that the existing rules or standard on parking and access, signage and visible building on the stand, which are entirely consistent with the proposed objectives and policies, be incorporated in the relevant HAR or HAS Part A The Strand section of the PDP. parking, access, signposting and new	Amend to ensure key controls in the Operative plan are included such as 12.5A.6.1.3 Parking and access in the strand 12.5A.6.1.2 Signs in the strand and kerikeri Basin heritage precincts 12.5A.6.2.3 New buildings which are



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					buildings have the potential to easily detract from what is a national significant heritage area.	not visible to the public
<b>John Andrew Riddell (S431)</b>	S431.063	Heritage area overlays	Standards	Not Stated	In general the heritage area provisions in the operative Plan comprehensively address the protection of historic heritage and character and there are no sound resource management reasons why the provisions cannot be carried over into the proposed Plan largely without alteration.	Insert new standard HA-S4 in the Heritage Area Overlay rules applying to the Kororāreka Russell Heritage Overlay Area: <b>HA-S4 Building or Structure CoverageThe maximum combined net floor area of all buildings or structures on the site is no more than 20% of the net site area.Where the standard is not met, matters of discretion are restricted to:</b> a. the size, location and design of open space;b. the character and amenity of the surrounding area;c. the extent that screening, planting and landscaping are utilised for mitigating adverse effects;d. cultural and historic heritage values;e. the extent of building area and the scale of the building and the extent to which they are compatible with both the built and natural environments in the vicinity;f. consistency with the Kororāreka/Russell Design Guidelines Subdivision
<b>Bayswater Inn Ltd (S29)</b>	S29.003	Heritage area overlays	HA-S1	Oppose	40 Marsden Road, Paihia, should retain the provisions of the Operative District Plan that were imposed following an appeal to the	Amend HA-S1 as it applies to 40 Marsden Road, Paihia. The rule should not apply as it cannot be

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					Environment Court 2005/2006. The new provisions in the Proposed District Plan should not apply. Heritage Overlay - Paihia Heritage Area - Part B. The PDP is now applying new rules and other provisions and standards that do not currently apply to the property.	achieved and is impractical for long sections.
<b>Lynley Newport (S127)</b>	S127.001	Heritage area overlays	HA-S1	Oppose	There is no resource management-based justification for the 75m setback. This has no relevance to heritage values being protected. The overlay area displays numerous buildings already within the 75m. To require consent for additions and alterations to buildings already closer than 75m is restrictive and considerable over-reach of powers.	Delete the reference to Te Waimate Heritage Overlay from Standard HA-S1.
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.107	Heritage area overlays	HA-S1	Support in part	The part of the standard that is not supported by Federated Farmers is the setback requirement of a minimum of 75m for any construction of buildings or structures or additions to building structures from a scheduled heritage resource or the road boundaries of State Highway 1 and other specified roads. It is unclear why a 75m setback is proposed for this standard. It is more appropriate that a consistent approach to setbacks is used rather than a number of different distances. Federated Farmers seeks the amendment of the setback in the Te Waimate Heritage Overlay so that the required setback is 20m which is consistent with the other setbacks required in heritage overlays.	Delete the second standard from Standard HA-S1, as follows: <del>Any construction of buildings or structures and additions and alterations to all buildings or structures shall be setback a minimum of 75m from:</del> <ol style="list-style-type: none"> <li>1. <del>a scheduled Heritage Resource; and</del></li> <li>2. <del>the road boundaries of State Highway 1, Te Ahu Ahu, Showgrounds and/or Waikaramu Roads.</del></li> </ol>
<b>Trent Simpkin (S23)</b>	S23.001	Heritage area overlays	HA-S2	Support in part	Use of 'and' between colour charts infers that the colour needs to be from all of the colour charts. A better explanation of what colours can be used is required.	Amend the standard to clarify if the colour has to be from one of these colour charts, or a colour that is within all of them.

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<b>Trent Simpkin (S33)</b>	S33.001	Heritage area overlays	HA-S2	Support in part	Brand names should not be used in the district plan i.e. Resene. Consideration needs to be given for Dulux and other paint suppliers who have the same or similar colors. There also needs to be provision made in this rule for unpainted materials - i.e. timber, concrete, steel etc, which often have clear coatings or stain.	Amend standard to de-brand the paint colours within the standard, and allow for use of raw materials, unpainted.
<b>Tristan Simpkin (S173)</b>	S173.001	Heritage area overlays	HA-S2	Support in part	Brand names should not be used in the district plan i.e. Resene. Consideration needs to be given for Dulux and other paint suppliers who have the same or similar colors. There also needs to be provision made in this rule for unpainted materials - i.e. timber, concrete, steel etc, which often have clear coatings or stain.	Amend standard to de-brand the paint colours within the standard, and allow for use of raw materials, unpainted.
<b>Alec Jack (S277)</b>	S277.015	Heritage area overlays	HA-S2	Oppose	I oppose the imposition of standards restricting the colour of the exterior facades of all buildings or structures. There are no heritage buildings on our land - all would be considered modern and so restrictions on colours is over reaching the intention to preserve heritage.	Amend Standard HA-S2 so that it does not apply to Pouerua Heritage Area.
<b>Trent Simpkin (S283)</b>	S283.007	Heritage area overlays	HA-S2	Oppose	Heritage colors are strictly painted, and need option for natural finishes. Submitter opposes this rule for three reasons: 1) it needs to allow for natural finishes i.e. timber, concrete etc, not just colors 2) the brand name 'Resene' should not be used, it should be generic 3) it does not allow for Colorsteel colors i.e. pre painted steel roofs etc which are often used on heritage buildings.	Amend standard to read ' <b>if the exterior surface is painted, it must have an exterior finish within Groups A, B or C as defined within the BS5252 standard cthey must be finished in accordance with the colour scheme from the following paint ranges or equivalent...</b> ' (inferred)
<b>Heritage New Zealand Pouhere Taonga (S570)</b>	S570.004	Heritage area overlays	HA-S2	Support in part	The plan provisions as notified promulgate an inconsistent set of rules with regards to the Heritage Colours standard HA-S2.	Amend HA-S2 to improve consistency and clarity of its application across the chapter and to only apply the standard to heritage areas where such a control is justified.

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<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.108	Heritage area overlays	HA-S3	Support	Federate Farmers supports the use of the accidental discovery as set out in this standard.	Retain Standard HA-S3 or ensure that amendments include similar wording that achieves the same intent
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.045	Heritage area overlays	Heritage Overlay - Kerikeri	Support in part	<p>Kerikeri Heritage Precinct (Heritage Character Area)</p> <ul style="list-style-type: none"> <li>o Access via Landing Road needs to be treated as the entrance to the heritage area and reflected through building restrictions on height, colours, non- reflective building materials, shape and design elements.</li> <li>o The rules should encourage native vegetative planting as means to lessen the visual amenity impact of buildings on the heritage area.</li> <li>o The heritage area should be extended to include the Kerikeri Inlet as this is the original gateway to Kororipo Pa and Town Basin. The visual view shaft needs protection.</li> <li>o It is important that the ridgelines form the boundary of the inner heritage area to prevent inappropriate development that will impact on the Town Basin area.</li> </ul>	Amend the provisions and spatial extent of Kerikeri Historic Heritage Area and insert additional new sub-areas (including associated overview, objectives, policies and rules) as indicated in submission
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.089	Heritage area overlays	Heritage Overlay - Kerikeri	Support in part	<p>Federated Farmers is concerned with the potential impacts of heritage area overlays and the restrictions the overlays will place over working farms in the Far North district. The farms in the district have been operating for many generations with the farmers proactively retaining the historic and cultural values that exist on the land. Federated Farmers supports the protection historical heritage as provided for by section 6 of the Resource Management Act 1991. Section 6 requires that the protection of historic heritage from inappropriate subdivision, use, and development is recognised and provided for. We have concerns that the heritage area overlays proposed go beyond what is provided for in the Act. The overlays for the</p>	Amend the Overview to the Kerikeri Heritage overlay so that it acknowledges and provides for existing, legally established rural activities as part of the existing environment

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					areas of Pouerua and Te Waimate Heritage areas do not acknowledge and provide for the existing rural activities that are legally occurring in those areas. We would not consider these activities as being an inappropriate use or development given the substantial contribution they make to the economy at all levels.	
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.046	Heritage area overlays	Heritage Overlay - Kohukohu	Support	We are supportive of the retention of the existing Kohukohu Heritage Area boundary as proposed.	Retain the Kohukohu Heritage Area
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.090	Heritage area overlays	Heritage Overlay - Kohukohu	Support in part	<p>Federated Farmers is concerned with the potential impacts of heritage area overlays and the restrictions the overlays will place over working farms in the Far North district. The farms in the district have been operating for many generations with the farmers proactively retaining the historic and cultural values that exist on the land.</p> <p>Federated Farmers supports the protection historical heritage as provided for by section 6 of the Resource Management Act 1991. Section 6 requires that the protection of historic heritage from inappropriate subdivision, use, and development is recognised and provided for.</p> <p>We have concerns that the heritage area overlays proposed go beyond what is provided for in the Act. The overlays for the areas of Pouerua and Te Waimate Heritage areas do not acknowledge and provide for the existing rural activities that are legally occurring in those areas. We would not consider these activities as being an inappropriate use or development given the substantial contribution they make to the economy at all levels.</p>	Amend the Overview to the Kohukohu Heritage overlay so that it acknowledges and provides for existing, legally established rural activities as part of the existing environment
<b>Heritage New Zealand Pouhere</b>	S409.034	Heritage area overlays	Heritage Overlay -	Support in part	Kororareka Russell Heritage Area and surrounds - It is extremely evident that the proposed	Amend the provisions and spatial extent of the Kororareka Russell Heritage Area and insert additional

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Taonga (S409)			Kororāreka Russell		<p>heritage area will not protect Russell Peninsula from adverse and detrimental development. There are already examples of building development that is completely out of character and scale in the area. Heritage New Zealand Pouhere Taonga requests the following:</p> <ul style="list-style-type: none"> <li>o That the heritage area be considered when standing upon Te Maiki (Flagstaff Hill). From this vantage point one can see across Kororareka towards Waikare Inlet, eastward out to Motorua Island, northward to the Black Rocks and west towards Waitangi and Paihia. These views hafts need to be protected and conserved from inappropriate development especially those on ridgelines.</li> <li>o Pa sites need to be included in the Heritage Area. There is a rich history associated with pa sites.</li> <li>o We advocate a separate heritage layer for the entrance to the Russell Peninsula starting from the Russell Whakaparara Road intersection. This area is to provide a visual protection from further adverse development, including promotion of native visual buffer planting. Russell is situated on a peninsula and the plan needs to take into account the special character of this peninsula.</li> <li>o In addition to the boundary defined within the draft plan, we request that a further planning layer be applied to the east and north for the balance of the peninsula that will prevent development on the ridgelines, restrict exterior colours to the heritage colour palate and control reflectivity. This is to include Long Beach and the area behind. It is essential that development is considered from when viewed not only from land but also from the Bay.</li> <li>o The planning controls in the draft district plan need to ensure that the viewshafts</li> </ul>	new sub-areas (including associated overview, objectives, policies and rules) as indicated in submission

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					remain	
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.091	Heritage area overlays	Heritage Overlay - Kororāreka Russell	Support in part	<p>Federated Farmers is concerned with the potential impacts of heritage area overlays and the restrictions the overlays will place over working farms in the Far North district. The farms in the district have been operating for many generations with the farmers proactively retaining the historic and cultural values that exist on the land.</p> <p>Federated Farmers supports the protection historical heritage as provided for by section 6 of the Resource Management Act 1991. Section 6 requires that the protection of historic heritage from inappropriate subdivision, use, and development is recognised and provided for.</p> <p>We have concerns that the heritage area overlays proposed go beyond what is provided for in the Act. The overlays for the areas of Pouerua and Te Waimate Heritage areas do not acknowledge and provide for the existing rural activities that are legally occurring in those areas. We would not consider these activities as being an inappropriate use or development given the substantial contribution they make to the economy at all levels.</p>	Amend the Overview to the Kororareka Heritage overlay so that it acknowledges and provides for existing, legally established rural activities as part of the existing environment
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.047	Heritage area overlays	Heritage Overlay - Mangōnui and Rangitoto Peninsula	Support in part	<p>Mangonui and Rangitoto Peninsula Historic Heritage Area</p> <ul style="list-style-type: none"> <li>o We are supportive of the proposed heritage areas insofar as the extent of the proposed boundaries for Manganui and Rangitoto Peninsula/Butler Point Area, however we consider that the boundary needs to be extended to include the entire harbour and associated adjacent ridge line perimeter. Our comments are as follows: <ul style="list-style-type: none"> <li>- The reason that both Maori and Europeans settled at Manganui and Rangitoto was because of the harbour itself.</li> </ul> </li> </ul>	Amend the provisions and spatial extent of Mangonui and Rangitoto Peninsula Historic Heritage Area and insert additional new sub-areas (including associated overview, objectives, policies and rules) as indicated in submission

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					<p>It provided shelter, ki moana, and was a gateway and stepping location for departures back to the Pacific and Hawaii and for trading. The entire harbour was utilised as evidenced by the recorded archaeology associated with Paewhenua Island, that included flaking floors, flax industry, and mill etc.</p> <ul style="list-style-type: none"> <li>- A number of pa sites including at Rangikapiti, Rangitoto, Taemaro Road (P04/70) and others are located at the entrance to and surrounding the harbour. Vistas to and from these pa sites need protection, including a prohibition on plantation planting on the pa sites - (P04/70) contains a pine plantation. These pa sites clearly demonstrate the spread of pre-European occupation around the perimeter of Manganui Harbour. These pa sites are related visually and through whakapapa.</li> <li>- It is important that the open areas of Butlers Point are protected from any further building development. This land is a backdrop to Manganui Township and Rangitoto Pa. That area also contains a significant number of recorded archaeological sites.</li> <li>- Heritage New Zealand requests that the proposed heritage areas be progressed, but with additional sublayer comprising the balance of the harbour area up to the perimeter ridgeline.</li> </ul> <p>Controls need to be sufficiently assertive to prevent development upon the ridgelines, or protruding above the ridgelines, and adoption of recessive colours and non-reflective building materials in the sub-area. By doing so the landscape character of the harbour will be retained.</p>	



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<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.092	Heritage area overlays	Heritage Overlay - Mangōnuī and Rangitoto Peninsula	Support in part	<p>Federated Farmers is concerned with the potential impacts of heritage area overlays and the restrictions the overlays will place over working farms in the Far North district. The farms in the district have been operating for many generations with the farmers proactively retaining the historic and cultural values that exist on the land.</p> <p>Federated Farmers supports the protection historical heritage as provided for by section 6 of the Resource Management Act 1991. Section 6 requires that the protection of historic heritage from inappropriate subdivision, use, and development is recognised and provided for.</p> <p>We have concerns that the heritage area overlays proposed go beyond what is provided for in the Act. The overlays for the areas of Pouerua and Te Waimate Heritage areas do not acknowledge and provide for the existing rural activities that are legally occurring in those areas. We would not consider these activities as being an inappropriate use or development given the substantial contribution they make to the economy at all levels.</p>	Amend the Overview to the Mangonui and Rangitoto Peninsula Heritage overlay so that it acknowledges and provides for existing, legally established rural activities as part of the existing environment
<b>RHL and LM Ferguson Family Trust (S513)</b>	S513.001	Heritage area overlays	Heritage Overlay - Mangōnuī and Rangitoto Peninsula	Oppose	<p>All of the Rangitoto Peninsula ('RP') (i.e. land on the eastern side of the Mangōnuī Harbour to the west of the Hihi urban area, and including Butler Point) is proposed to be subject to the 'Mangōnuī and Rangitoto Peninsula Heritage Area ('MRPHA') - Part B Overlay'. We consider it inappropriate and non-compliant with the RMA as well as contrary to the principles of fair and equitable regulatory practice to extend the RPHAB over the whole of the RP for the following reasons:</p> <ol style="list-style-type: none"> <li>1. The rationale for, and the areal extent of, the RPHAB was based on inadequate and incomplete expert evidence and analysis.</li> <li>2. The boundaries for the RPHAB do not</li> </ol>	Delete the Heritage Area overlay from the Rangitoto Peninsula except for the land directly associated with and/or proximal to listed Heritage Resources. At this time the only listed Heritage Resource on the RP is 'Butler House' that is historically significant in large part due to the whaling ship provisioning enterprise that Captain William Butler conducted in the mid-19th Century. The land that this resource and that enterprise is on, or directly relates to, is Lots 1 and 2 of Section 2 Village of Mangōnuī (Marchant Road, Hihi) and no other

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					<p>adhere to any self-consistent logic.</p> <p>3. The Ferguson Family Trust, having restored and maintained Butler House for over 50 years, and opened it to the public, has already voluntarily entered a formal agreement with Heritage New Zealand Pouhere Taonga. This places strict caveats on all aspects of the maintenance and development of Allot 1 Sec 2 Village of Mangōnui on which the Butler House is sited, as well as Allot 4 Sec 2 Village of Mangōnui. Thus, a further Heritage Area overlay over these historical sites is actually unnecessary as the sites are already protected.</p> <p>Although we do not see the point of a Heritage Area overlay complicating an already protected area, we are prepared to agree to this with respect to Lot 2,4,5,6,7,8 &amp; 10 Section 2 Village of Mangōnui; Lot 1 Section 2 Village of Mangōnui; Lot 9 Section 2 Village of Mangōnui; All the land in Crown Grant 57H (H.1.37); Allotment 67 Parish of Mangōnui East ... as this is entirely consistent with the vision our family has had for conserving these sites ever since we acquired the property in 1970.</p> <p>We do object strenuously to an extension of the heritage area over all of the rest of our property, Part Allotment 2 Parish of Mangōnui East and Part Lot 1 Deposited Plan 48582 that have no historical significance with regard to colonial history, and have no documented Maori sites.</p> <p>The Section 32 Heritage assessment did not evaluate, as it is required to do by the RMA, the impact of arbitrarily imposing Heritage Area overlays over large tracts of land with regard to the wider benefits and costs. This must include recognition of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions. Retaining</p>	<p>parts of the Rangitoto Peninsula .</p>

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					<p>the potential to develop areas of our property that have no heritage significance will be a necessary requirement to maintain the financial viability of our internationally significant tourist operation.</p> <p>Thus, a very real social, economic and cultural consequence of this draconian overreach by the Far North District Council would be closure of Butler Point to the General Public.</p>	
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.035	Heritage area overlays	Heritage Overlay - Paihia	Support in part	<p>Paihia Heritage Area - It should be noted that in the Paihia Cemetery in the rear yard of the Church of Paul and Henry Williams contains Maori burials. This is not referenced in the archaeologist's report.</p> <p>We support the recommendation of the consultant archaeologists for the inclusion of the Waitangi Islands - Motu o Rangi, Motuarahi, Motu Maire and Kuia Rongouru/Taylor Island because of their historical, contextual and spatial relationship. They are of significance to iwi and are listed with Heritage New Zealand Pouhere Taonga as wahi tapu.</p> <p>The heritage area should also include the Paihia Village Green scenic reserve, and the historic library at 2 Williams Road.</p> <p>There needs to be development restrictions on the entire ridge (behind the Church) that overlooks the Bay. This is a prominent ridge that contains Pa, archaeology and other artifacts. It is the backdrop for the town and provides a visual escapement from the bay encapsulating the town.</p> <p>An additional sub area is recommended for the area south of the river Te Haumai to include the settlement of Tohitapu as also suggested by Plan Heritage Limited.</p>	Amend the provisions and spatial extent of the Paihia Heritage Area and insert additional new sub-areas (including associated overview, objectives, policies and rules) as indicated in submission
<b>Northland Federated Farmers of</b>	S421.093	Heritage area overlays	Heritage Overlay - Paihia	Support in part	<p>Federated Farmers is concerned with the potential impacts of heritage area overlays and the restrictions the overlays will place</p>	Amend the Overview to the Paihia Heritage overlay so that it acknowledges and provides for

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<b>New Zealand (S421)</b>					<p>over working farms in the Far North district. The farms in the district have been operating for many generations with the farmers proactively retaining the historic and cultural values that exist on the land. Federated Farmers supports the protection historical heritage as provided for by section 6 of the Resource Management Act 1991. Section 6 requires that the protection of historic heritage from inappropriate subdivision, use, and development is recognised and provided for. We have concerns that the heritage area overlays proposed go beyond what is provided for in the Act. The overlays for the areas of Pouerua and Te Waimate Heritage areas do not acknowledge and provide for the existing rural activities that are legally occurring in those areas. We would not consider these activities as being an inappropriate use or development given the substantial contribution they make to the economy at all levels.</p>	<p>existing, legally established rural activities as part of the existing environment</p>
<b>The Paihia Property Owners Group (S565)</b>	S565.001	Heritage area overlays	Heritage Overlay - Paihia	Oppose	<p>The PDP approach associated with the Paihia Heritage Areas A and B is not supported. The analysis that underpins the PDP approach is broad in nature and has not been undertaken on a site by site basis to verify and confirm that each site has the values considered worthy of identification and protection. If Council is to impose the blanket identification of the areas, there must be more appropriate site by site analysis and assessment undertaken to confirm the heritage values sought to be protected. Development has been undertaken in accordance with the Operative District Plan in relation to the Paihia Mission Heritage Area which went through a lengthy plan change process and considered the area and surrounds in far greater detail than the PDP. Council's s32 report suggests that there is no</p>	<p>Amend the proposed Paihia Heritage Areas A and B and their provisions and revert back to the Paihia Mission Heritage Area and associated provisions.</p>

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					technical evidence to support the existing spatial extent for the Paihia Mission Heritage Area.	
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.039	Heritage area overlays	Heritage Overlay - Pouerua	Support in part	<p>Pouerua Historic Heritage Area</p> <ul style="list-style-type: none"> <li>o The proposed heritage area is a significant expansion on the current area, but that expansion is generally in a southern direction towards Moerewa that encompasses only a few recorded archaeological sites, inclusive of a pa site, but otherwise a landscape that does not appear to be of heritage value. The area does not contain any Stonefield sites and appears to be in modern pastoral farming. We would like to have clarification why this area is included in the report.</li> <li>o The boundary as extended slightly to the north does include a significant cultural landscape containing various pa sites and stone structures.</li> <li>o It is evident that there needs to be a continuous connection between the proposed Pouerua Heritage Areathrough to State Highway 12 and north of State Highway 1 through to the proposed southern boundary of the proposed Te Waimate Historic Heritage Area. This would protect the foreground vista through to the ridge pa sites from State Highway 1.</li> <li>o The focus of this heritage area should be on the Maunga and the stone gardens with very strict controls. The balance area (proposed extension area) could be subject to less restrictive rules. The context of the area is that the volcanic soils have been the driver of the rich cultural landscape that includes, gardens, pa, kainga and early colonial buildings.</li> </ul>	Amend the provisions and spatial extent of the Pouerua Heritage Area and insert additional new sub-areas (including associated overview, objectives, policies and rules) as indicated in submission
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.094	Heritage area overlays	Heritage Overlay - Pouerua	Support in part	Federated Farmers is concerned with the potential impacts of heritage area overlays and the restrictions the overlays will place over working farms in the Far North district. The farms in the district have been operating	Amend the Overview to the Pouerua Heritage overlay so that it acknowledges and provides for existing, legally established rural activities as part of the existing

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					<p>for many generations with the farmers proactively retaining the historic and cultural values that exist on the land. Federated Farmers supports the protection historical heritage as provided for by section 6 of the Resource Management Act 1991. Section 6 requires that the protection of historic heritage from inappropriate subdivision, use, and development is recognised and provided for. We have concerns that the heritage area overlays proposed go beyond what is provided for in the Act. The overlays for the areas of Pouerua and Te Waimate Heritage areas do not acknowledge and provide for the existing rural activities that are legally occurring in those areas. We would not consider these activities as being an inappropriate use or development given the substantial contribution they make to the economy at all levels.</p>	environment
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.036	Heritage area overlays	Heritage Overlay - Rangihoua	Support	The extent of the Rangihoua Heritage Area is deemed to be appropriate.	Retain the Rangihoua Heritage Area
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.095	Heritage area overlays	Heritage Overlay - Rangihoua	Support in part	<p>Federated Farmers is concerned with the potential impacts of heritage area overlays and the restrictions the overlays will place over working farms in the Far North district. The farms in the district have been operating for many generations with the farmers proactively retaining the historic and cultural values that exist on the land. Federated Farmers supports the protection historical heritage as provided for by section 6 of the Resource Management Act 1991. Section 6 requires that the protection of historic heritage from inappropriate subdivision, use, and development is recognised and provided for. We have concerns that the heritage area</p>	Amend the Overview to the Rangihoua Heritage overlay so that it acknowledges and provides for existing, legally established rural activities as part of the existing environment

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					<p>overlays proposed go beyond what is provided for in the Act. The overlays for the areas of Pouerua and Te Waimate Heritage areas do not acknowledge and provide for the existing rural activities that are legally occurring in those areas. We would not consider these activities as being an inappropriate use or development given the substantial contribution they make to the economy at all levels.</p>	
<p><b>Heritage New Zealand Pouhere Taonga (S409)</b></p>	<p>S409.041</p>	<p>Heritage area overlays</p>	<p>Heritage Overlay - Rāwene</p>	<p>Support in part</p>	<p>Rawene Historic Heritage Area</p> <ul style="list-style-type: none"> <li>o Rawene township is situated at the northern end of a peninsula that leads into the Hokianga Harbour. Rawene's vehicle access is from Twin Coast Discovery Highway via State Highway 12 from the south and from Kohukohu to the north via the car ferry. Due to the prominent location of the township, it is visible from both the Hokianga Harbour and land. The township with its unique character, historic buildings, and rich history is a tourism destination on the Twin Coast Discovery Highway. Many local business' cater for day travellers.</li> <li>o It seems that Plan Heritage Limited has defined the proposed heritage area boundary from "lots which fall within the early township that are distinctly different (earlier) subdivision form, and which are shown in historical aerial topography to have generally been developed by 1942". Unfortunately, that mapped area excludes some very important places.</li> <li>o Heritage New Zealand recommends that the proposed heritage area be expanded to include the Hokianga Health Enterprise Trust facility (hospital) - first free hospital service, the cemetery that contains the remains of ancestors (located diagonally opposite the hospital) and the Rawene Domain. In addition, adjacent to the camping ground</li> </ul>	<p>Amend the provisions and spatial extent of the Rawene Heritage Area and insert additional new sub-areas (including associated overview, objectives, policies and rules) as indicated in submission</p>

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					<p>contains a site of significance to Maori and needs to be incorporated into the heritage area.</p> <ul style="list-style-type: none"> <li>o A further sub area should include the entire peninsula and contain lesser rules that protect the entrance way view to the township by design, colour and shape and set back rules.</li> <li>o Furthermore, there needs to be restrictions the prevent development on the ridge line of the peninsula as the viewshafts need to be protected when looking to Rawene across the harbour</li> </ul>	
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.096	Heritage area overlays	Heritage Overlay - Rāwene	Support in part	<p>Federated Farmers is concerned with the potential impacts of heritage area overlays and the restrictions the overlays will place over working farms in the Far North district. The farms in the district have been operating for many generations with the farmers proactively retaining the historic and cultural values that exist on the land. Federated Farmers supports the protection historical heritage as provided for by section 6 of the Resource Management Act 1991. Section 6 requires that the protection of historic heritage from inappropriate subdivision, use, and development is recognised and provided for. We have concerns that the heritage area overlays proposed go beyond what is provided for in the Act. The overlays for the areas of Pouerua and Te Waimate Heritage areas do not acknowledge and provide for the existing rural activities that are legally occurring in those areas. We would not consider these activities as being an inappropriate use or development given the substantial contribution they make to the economy at all levels.</p>	Amend the Overview to the Rawene Heritage overlay so that it acknowledges and provides for existing, legally established rural activities as part of the existing environment
<b>Cinna Smith (S73)</b>	S73.001	Planning maps	Heritage Overlay - Te Waimate	Support in part	<p>Welcome any measures to better protect the outstanding heritage values of Te Waimate and support the proposed change to the</p>	Amend the heritage overlay boundary as follows:



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					<p>boundary area. However, the boundary area needs to be further extended to protect Te Waimate's open, pastoral vistas and other heritage landmarks that are currently excluded. The current draft does not adequately protect the landscape from undue development or change of land use. Unchecked development has ruined so much in Te Waimate in the past decade and the features that make Te Waimate unique and a taonga of national, and international, importance will soon be gone forever.</p>	<ul style="list-style-type: none"> <li>• Encompass the valley north of the Mission Station (to the bush and ridge), including Courthouse Lane and as far as the school (near the intersection of Waimate North Road).</li> <li>• The farm/valley directly opposite the Mission on Te Ahu Ahu Road (formerly 'Cook's Farm') was the site of the first pastoral farm in New Zealand. This is clearly marked and recognised in the maps and illustrations of missionary settlers. This area is directly visible from the Mission and I believe that it should be included in the heritage area.</li> <li>• On the edge of this farm, opposite Te Waimate's historic church, is a cluster of ancient trees where local Maori left their tūpāpaku/dead. It is my understanding that this area is of great spiritual significance to Maori, yet it is not within the proposed heritage boundary. Again, this area is clearly marked in the maps of early missionaries as a "knoll and sacred grove."</li> <li>• Also near the Mission, Cook's Lane is the first road from Te Waimate to Kerikeri. It is narrow dirt lane, but is now being used by large, heavy trucks associated with the kiwifruit</li> </ul>

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						development. I believe that this road should be protected from heavy use such as this and included in the heritage area.
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.043	Heritage area overlays	Heritage Overlay - Te Waimate	Support in part	<p>Te Waimate Historic Heritage Area</p> <ul style="list-style-type: none"> <li>o The proposed heritage area is an improvement on the current Heritage precinct however it still does not protect the landscape from undue development or change of land use.</li> <li>o Pastoral farming in New Zealand was first established at Te Waimate, including in the valley north of the Mission Station. This area is now under threat from horticultural farming practises that include structures associated with kiw fruit and avocado orchards. The proposed heritage area excludes most of this valley. We request that the heritage area be extended to include the valley through to the top of the bush escarpment and ridge situated immediately north of the Mission Station.</li> <li>o We also recommend controls associated with the change of land use from pastoral farming to horticulture. Cropping need not be included.</li> </ul>	Amend the provisions and spatial extent of Te Waimate Historic Heritage Area and insert additional new sub-areas (including associated overview, objectives, policies and rules) as indicated in submission
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.097	Heritage area overlays	Heritage Overlay - Te Waimate	Support in part	<p>Federated Farmers is concerned with the potential impacts of heritage area overlays and the restrictions the overlays will place over working farms in the Far North district. The farms in the district have been operating for many generations with the farmers proactively retaining the historic and cultural values that exist on the land. Federated Farmers supports the protection historical heritage as provided for by section 6 of the Resource Management Act 1991. Section 6 requires that the protection of</p>	Amend the Overview to the Te Waimate Heritage overlay so that it acknowledges and provides for existing, legally established rural activities as part of the existing environment

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					<p>historic heritage from inappropriate subdivision, use, and development is recognised and provided for.</p> <p>We have concerns that the heritage area overlays proposed go beyond what is provided for in the Act. The overlays for the areas of Pouerua and Te Waimate Heritage areas do not acknowledge and provide for the existing rural activities that are legally occurring in those areas. We would not consider these activities as being an inappropriate use or development given the substantial contribution they make to the economy at all levels.</p>	
<p><b>The General Trust Board of the Diocese of Auckland (S514)</b></p>	<p>S514.001</p>	<p>Planning maps</p>	<p>Heritage Overlay - Te Waimate</p>	<p>Oppose</p>	<p>The proposed inclusion of heritage protection for the Sunday School at the Church of St John the Baptist (Historic Site 117 being at 344 Te Ahu Ahu Road, Ohaeawai) is opposed.</p> <p>The Church is already included in the Historic Site overlay. As outlined in the Section 32 Evaluation Report for Historic Heritage and Heritage Areas, "there is no standard methodology or assessment criteria to identify significant heritage buildings" (page. 14). It is therefore considered that the current extent of the Heritage Overlay encapsulating the Church and excluding the Sunday School is sufficient to protect the heritage values of the site.</p>	<p>Delete the Te Waimate Heritage Area overlay from the Sunday School at 344 Te Ahu Ahu Road, Ohaeawai.</p>
<p><b>Heather Adams and Duncan Ross (S545)</b></p>	<p>S545.001</p>	<p>Planning maps</p>	<p>Heritage Overlay - Te Waimate</p>	<p>Support in part</p>	<p>We strongly support the concept of protecting the unique heritage values, context and landscape of Te Waimate Heritage Area, however we believe that the proposed plan does not go far enough to protect the outstanding landscape and heritage values of the area. Heritage sites have been left out of the plan, such as Cooks Lane, Courthouse Lane and the second site of the flour mill. These sites reinforce the uniqueness of the area. we have grave</p>	<p>Amend the Te Waimate Heritage Area to extend it to include much more of the unique historic vista from the Mission House complex, Cooks Lane, Courthouse Lane, Whakataha Road, the second site of the flour mill.</p>

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					<p>concerns for what is left of the pastoral landscape, particularly the vista from the Mission House. Already much of the 'notable attempt by the missionaries to recreate an English pastoral landscape' has been recently destroyed, the removal of the hedge rows, trees, a huge amount of soil being moved about, and replaced with overwhelming horticultural development.</p>	
<p><b>Heritage New Zealand Pouhere Taonga (S409)</b></p>	<p>S409.019</p>	<p>Historic heritage</p>	<p>Overview</p>	<p>Support in part</p>	<p>In the context of protecting historic heritage, the overall Section 6(f) RMA evaluation is not simply a matter of considering effects on listed historic heritage in a Plan but is broader and encompasses effects upon historic heritage generally in decision-making as such effects are part of the cumulative picture through consideration of the character and significance of the whole wide heritage area.</p> <p>Historic heritage includes those items Scheduled by Council and heritage yet to be identified and/or assessed.</p> <p>Reference should also be made to the blanket protection of dry stone walls</p> <p>It is noted that cultural landscapes are dealt with under the Heritage area overlays section of the PDP.</p> <p>However, the last paragraph is not proactive for scheduling purposes as was outlined in Appendix B of this submission for the Draft PDP.</p> <p>HNZPT considers that it is appropriate to proactively ensure that there is a systematic and on-going programme by council over time to review the Schedule with a view to assessing and scheduling more places and areas rather than what can become a 'one time only' upon Proposed Plan notification approach. Too much priority can also be placed upon additions to the HNZPT New Zealand Heritage List/Rarangi Korero.</p> <p>However, HNZPT do not have the same</p>	<p>Amend paragraph 3 of the Historical heritage Overview as follows (or wording to this effect):</p> <p>While this chapter only has Rules for Scheduled heritage resources <b>and dry stone walls of historic value that are not individually scheduled but are subject to blanket protection</b>, consideration of non-scheduled resources can occur at the time of processing a resource consent, or when undertaking earthworks.</p> <p>Amend the last paragraph of the Historical heritage Overview as follows (or wording to this effect):<del>Due to the scale of Historic Heritage within the District, it is not financially viable to identify all Heritage Resources, and for cultural reasons some resources should not be formally identified (e.g., urupa/burial grounds). Council will continue to where possible, work with other government agencies (e.g.,</del></p>

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					<p>level of resources or capabilities for the district as the Council does.                      Mention of a heritage fund supports PDP HH-P9.                      Including ArchSite as an information layer within the GIS system can help identify when an archaeological authority may be required before undertaking any work. It supports HH-P8 and HH-P11.</p>	<p><del>Heritage New Zealand Pouhere Taonga) tangata whenua and the public to identify valued Heritage Resources and schedule them in the District Plan.</del> <b>In identifying historic heritage for protection within the District, Council's emphasis is on historic heritage already listed by Heritage New Zealand Pouhere Taonga; sites and areas of significance to Maori identified by iwi/hapu; and locally, regionally and potentially nationally significant items identified by Council as part of a staged programme in conjunction with the Northland Regional Council. However, Council also envisages this formal process being off-set by additional, more modern approaches to recording, relating and celebrating the stories and events of the past, including non-statutory methods such as a heritage fund, heritage trails and information plaques in accordance with the Arts, Culture and Heritage Strategy for Far North. Council will also include ArchSite, the online version of the New Zealand Archaeological Association's Site</b></p>

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						<p>recording Scheme, as an information Map Layer tool within the GIS system. This will help users to assess when an archaeological authority may be required from Heritage New Zealand Pouhere Taonqa, although not all sites will be identified on it as the District has not been systematically surveyed; there will be previously unknown sites; and many sites have not yet been 'ground truthed'.</p>
<p><b>Northland Federated Farmers of New Zealand (S421)</b></p>	<p>S421.109</p>	<p>Historic heritage</p>	<p>Overview</p>	<p>Oppose</p>	<p>Federated Farmers is concerned that the Council is using regulatory methods as a means to manage historic heritage without the non-regulatory methods supporting in the background. Council needs to utilise more non-regulatory methods for managing historical heritage. Landowner engagement and education should be the first approach to the effective management of historic heritage rather than the Council relying on regulatory methods which will only work where there is damage and change to the historic heritage feature.</p> <p>As well, the overview needs to be consistent with the requirements of s6(f) of the Resource Management Act 1991. Section 6(f) requires the recognition and provision of the protection of historic heritage from inappropriate subdivision, use and development. Only inappropriate activities that could cause more than minor effects on heritage and cultural values should be managed. Existing use rights of lawfully</p>	<p>Amend the Overview so that it promotes the use of non-regulatory methods as well as ensuring that historic heritage will be protected from inappropriate subdivision, use and development</p>

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					established activities also need to be recognised and protected.	
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.002	Historic heritage	Objecitives	Support	The Proposed Plan is required to recognise and provide for the matters of national importance, in particular 6(f) "the protection of historic heritage from inappropriate subdivision, use and development" and s6(e) "the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga." HNZPT considers that the hybrid-plan format of the Proposed Plan, that includes: the identification of historic heritage; heritage area overlays; Kororareka Russell Township Zone and Sites and Areas of Significance to Maori issues (Overview), objectives, policies and rules each within a Section of the plan, is of assistance to the reader in understanding the background and reasons for the rules.	Retain the historic heritage objectives
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.020	Historic heritage	Objecitives	Support in part	HNZPT supports the Historic Heritage Objectives where they are consistent with the HNZPT non-statutory Sustainable Management of Historic Heritage Guidance Series: Guide to the Management of Historic Heritage: District Plans (April 2022) recommended Objectives. HNZPT is concerned about the protection of Dry Stone Walls. There are a number of locations in the district where historic (pre-1900) stone walls are prevalent. A specific Objective to recognise their importance would be appropriate.	Retain the objectives and insert a new objective as follows (or words to this effect): <b>HH-04 Dry stone walls of historic, cultural, amenity and landscape value to the community are maintained and protected throughout the district.</b>
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.110	Historic heritage	HH-O1	Support	Federated Farmers supports objectives HH-O1 and HH-O3 as they are currently drafted in the proposed district plan.	Retain Objective HH-O1 or ensure that amendments include similar wording that achieves the same intent
<b>Northland Federated Farmers of</b>	S421.112	Historic heritage	HH-O2	Support in part	In respect of objective HH-O2, Federated Farmers requests that the objective is amended to be consistent with s6(f) of the	Amend Objective HH-O2 as follows: <del>Land use and subdivision</del> <b>does not result in the loss or</b>

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New Zealand (S421)					Resource Management Act 1991. This will ensure that recognition is made in the objectives to only capture what is considered to be inappropriate subdivision, use and development for that specific heritage area.	<del>degradation of Heritage Resources.</del> <b>Historic heritage is protected from inappropriate subdivision, use, and development in the district.</b> or wording with similar intent
Northland Federated Farmers of New Zealand (S421)	S421.111	Historic heritage	HH-O3	Support	Federated Farmers supports objectives HH-O1 and HH-O3 as they are currently drafted in the proposed district plan.	Retain Objective HH-O3 or ensure that amendments include similar wording that achieves the same intent
Te Hiku Iwi Development Trust (S399)	S399.052	Historic heritage	Policies	Not Stated	The historical and cultural values policies do not provide for accidental discovery of artefacts or kōiwi (human remains) that are not the result of earthworks. The policies do not provide for the repatriation of taonga to tangata whenua as an automatic requirement of resource consents. This has led to the loss of taonga in the past.	Insert a new policy as follows: <b>HH-P16 Require a protocol for accidental discovery of artefacts or kōiwi (human remains) which is consistent with any relevant iwi/hapū management plan(s) as a condition of consent for all works requiring land use consent.</b>
Te Hiku Iwi Development Trust (S399)	S399.053	Historic heritage	Policies	Not Stated	The historical and cultural values policies do not provide for accidental discovery of artefacts or kōiwi (human remains) that are not the result of earthworks. The policies do not provide for the repatriation of taonga to tangata whenua as an automatic requirement of resource consents. This has led to the loss of taonga in the past.	Insert a new policy as follows: <b>HH-P17 Require activities adjacent to or affecting sites of significance to Māori and/or archaeological sites identified in a iwi/hapū management plan or where there is reasonable cause to suspect there is an archaeological site to demonstrate the activity is having appropriate regard to:a) the outcomes of consultation</b>



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						with tangata whenua including the affected hapū and relevant iwi authority;b) any management set out in an iwi/hapū management plan;c) any assessments or advice from a suitably qualified and experienced archaeological expert; andd) the outcomes of consultation with Heritage New Zealand Pouhere Taonga and the Department of Conservation
Heritage New Zealand Pouhere Taonga (S409)	S409.003	Historic heritage	Policies	Support	The Proposed Plan is required to recognise and provide for the matters of national importance, in particular 6(f) "the protection of historic heritage from inappropriate subdivision, use and development" and s6(e) "the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga." HNZPT considers that the hybrid-plan format of the Proposed Plan, that includes: the identification of historic heritage; heritage area overlays; Kororareka Russell Township Zone and Sites and Areas of Significance to Maori issues (Overview), objectives, policies and rules each within a Section of the plan, is of assistance to the reader in understanding the background and reasons for the rules.	Retain the historic heritage policies
Heritage New Zealand Pouhere Taonga (S409)	S409.024	Historic heritage	Policies	Support in part	A specific policy to recognise the importance of Dry Stone Walls would be appropriate.	Insert new policy HH-P16 as follows (or words to that effect): <b>HH-P16 Protect dry stone walls of historical, cultural and amenity value to the community through:1. Blanket protection of</b>

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						<p><b>dry stone walls throughout the District.2. Providing information and advice to the public, including Geographic Information Systems information on the location of protected dry stone walls.3. Discouraging planting close to dry stone walls.4. Encouraging proactive and appropriate maintenance.5. Recommending consultation with Heritage New Zealand where dry stone walls are estimated to have been constructed prior to 1900 or their age is in doubt.6. Limiting works affecting existing dry-stone walls, other than:</b></p> <p><b>a. Repairs or maintenance in situ using traditional methods, design and materials.b. Removal of up to 6m length of wall for access purposes only, where no alternative access exists.</b></p>
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.113	Historic heritage	HH-P1	Support	Federated Farmers supports policies HH-P1, HH-P3, HH-P4, HH-P5, HH-P7, HH-P9, HH-P10, HH-P11, HH-P12, HH-P13 and HH-P14 as currently drafted in the proposed district plan.	Retain Policy HH-P1 or ensure that amendments include similar wording that achieves the same intent
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.124	Historic heritage	HH-P2	Support in part	Federated Farmers has concerns over the proposed wording of Policy HH-P2 as it inconsistent with s6(f) of the Resource Management Act 1991. Section 6(f) requires the recognition and provision for the	Amend point a. of Policy HH-P2 as follows: a. Avoiding <b>inappropriate subdivision, use, and</b>

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					protection of the protection of historic heritage from inappropriate subdivision, use, and development. The policy as written does not reflect this.	<del>development significant adverse effects</del> and avoiding, remedying or mitigating any other adverse effects on the recognised heritage values of scheduled Heritage Resources  or wording with similar intent
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.114	Historic heritage	HH-P3	Support	Federated Farmers supports policies HH-P1, HH-P3, HH-P4, HH-P5, HH-P7, HH-P9, HH-P10, HH-P11, HH-P12, HH-P13 and HH-P14 as currently drafted in the proposed district plan.	Retain Policy HH-P3 or ensure that amendments include similar wording that achieves the same intent
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.115	Historic heritage	HH-P4	Support	Federated Farmers supports policies HH-P1, HH-P3, HH-P4, HH-P5, HH-P7, HH-P9, HH-P10, HH-P11, HH-P12, HH-P13 and HH-P14 as currently drafted in the proposed district plan.	Retain Policy HH-P4 or ensure that amendments include similar wording that achieves the same intent
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.021	Historic heritage	HH-P5	Support in part	Notwithstanding the scope of the proposed activity status to consider potential effects and involvement by HNZPT as an affected party, Policy HH-P5 should reference the need for the involvement of a suitably qualified and experienced heritage professional.	Amend subsection a. of Policy HH-P5 as follows (or words to that effect): a. The demolition or destruction is only part of the scheduled Heritage resource and it is demonstrated <b>by a suitably qualified and experienced heritage professional</b> that the part to be demolished or destroyed does not detract from the Heritage Resources values; or
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.116	Historic heritage	HH-P5	Support	Federated Farmers supports policies HH-P1, HH-P3, HH-P4, HH-P5, HH-P7, HH-P9, HH-P10, HH-P11, HH-P12, HH-P13 and HH-P14 as currently drafted in the proposed district plan.	Retain Policy HH-P5 or ensure that amendments include similar wording that achieves the same intent

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Northland Federated Farmers of New Zealand (S421)	S421.125	Historic heritage	HH-P6	Support in part	In respect of policy HH-P6, the policy should be amended so that it recognises that positive benefits can result in some circumstances from relocating certain historic heritage sites. For example, relocating a site out of an extreme flood hazard area to enable its on-going protection.	Insert a new point f. within Policy HH-P6 that recognises that in some circumstances there may be positive benefits from the relocation of certain historic heritage sites.
Northland Federated Farmers of New Zealand (S421)	S421.117	Historic heritage	HH-P7	Support	Federated Farmers supports policies HH-P1, HH-P3, HH-P4, HH-P5, HH-P7, HH-P9, HH-P10, HH-P11, HH-P12, HH-P13 and HH-P14 as currently drafted in the proposed district plan.	Retain Policy HH-P7 or ensure that amendments include similar wording that achieves the same intent
Heritage New Zealand Pouhere Taonga (S409)	S409.022	Historic heritage	HH-P8	Support in part	Policies HH-P8 and HH-P11 rely in part upon Standard EW-S3 Standard Accidental Discovery protocol for earthworks that triggers engagement with HNZPT and confirmation of the need or otherwise for an archaeological authority that will require an assessment. Mention of consultation with HNZPT generally would be useful and consistent with its inclusion in Policies HH-P11 and HH-P15.	Amend subsections d, e and f of Policy HH-P8 as follows (or words to that effect): d. avoidance of archaeological sites; <del>and</del> e. need for small-scale earthworks for burials within an existing cemetery or for landscaping within historic heritage sites and places; <b>and</b> <b>f any consultation undertaken with Heritage New Zealand Pouhere Taonga</b>
Northland Federated Farmers of New Zealand (S421)	S421.126	Historic heritage	HH-P8	Support in part	Policy HH-P8 needs to be amended to so that the requirement to demonstrate the protection of the heritage resource is removed. The need to demonstrate is not necessary as the policy requires the heritage resource to be protected after regard is had to the matters listed.	Amend Policy HH-P8 (inferred) as follows: Allow earthworks in proximity to scheduled Heritage Resources <del>only</del> where <del>it can be demonstrated that its</del> heritage values will be protected, having regard to the ... or wording with similar intent

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<b>Te Hiku Iwi Development Trust (S399)</b>	S399.048	Historic heritage	HH-P9	Not Stated	Mātauranga Māori and waahi are misspelled in the policy.	Amend point d. of Policy HH-P9 to include macrons as follows: d) encouraging mātauranga māori, tikanga and kaitiakitanga to manage and maintain wāhi taonga
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.118	Historic heritage	HH-P9	Support	Federated Farmers supports policies HH-P1, HH-P3, HH-P4, HH-P5, HH-P7, HH-P9, HH-P10, HH-P11, HH-P12, HH-P13 and HH-P14 as currently drafted in the proposed district plan.	Retain Policy HH-P9 or ensure that amendments include similar wording that achieves the same intent
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.119	Historic heritage	HH-P10	Support	Federated Farmers supports policies HH-P1, HH-P3, HH-P4, HH-P5, HH-P7, HH-P9, HH-P10, HH-P11, HH-P12, HH-P13 and HH-P14 as currently drafted in the proposed district plan.	Retain Policy HH-P10 or ensure that amendments include similar wording that achieves the same intent
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.050	Historic heritage	HH-P11	Not Stated	Policy HH-P11 does not recognise iwi/hapū management plans in land and subdivision activities	Amend point a. of Policy HH-P11 as follows: a. the outcomes of any consultation undertaken with tangata whenua, <b>any relevant iwi/hapū management plan</b> and the need to undertake a Cultural Impact Assessment;
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.120	Historic heritage	HH-P11	Support	Federated Farmers supports policies HH-P1, HH-P3, HH-P4, HH-P5, HH-P7, HH-P9, HH-P10, HH-P11, HH-P12, HH-P13 and HH-P14 as currently drafted in the proposed district plan.	Retain Policy HH-P11 or ensure that amendments include similar wording that achieves the same intent
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.127	Historic heritage	HH-P11	Support in part	Federated Farmers does not support policy HH-P11 as it is currently written. The policy, through the use of the term 'reasonable cause' introduces significant uncertainty for applicants as it is not clear what the term is	Delete Policy HH-P11, or if that relief is not accepted, amend as follows: Protect archaeological sites <del>where there is a reasonable cause to</del>

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					intended to mean and how it is to be determined and by whom. It also has the potential to increase the time, costs and resources required by an applicant.	<del>suspect they are present</del> , by ensuring land and subdivision activities have regard to: ... or wording with similar intent
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.121	Historic heritage	HH-P12	Support	Federated Farmers supports policies HH-P1, HH-P3, HH-P4, HH-P5, HH-P7, HH-P9, HH-P10, HH-P11, HH-P12, HH-P13 and HH-P14 as currently drafted in the proposed district plan.	Retain Policy HH-P12 or ensure that amendments include similar wording that achieves the same intent
<b>Transpower New Zealand Ltd (S454)</b>	S454.077	Historic heritage	HH-P12	Support	Transpower supports the inclusion of this policy in the FNPDP.	Retain Policy HH-P12
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.023	Historic heritage	HH-P13	Support in part	Policy HH-P13 should explicitly reference the need for the involvement of a suitably qualified and experienced heritage professional.	Amend subsection d. of Policy HH-P13 as follows (or words to that effect): d. the adverse effects on the heritage values of the scheduled Heritage Resource or Heritage Overlay are minimised <b>when assessed by a suitably qualified and experienced heritage professional.</b>
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.122	Historic heritage	HH-P13	Support	Federated Farmers supports policies HH-P1, HH-P3, HH-P4, HH-P5, HH-P7, HH-P9, HH-P10, HH-P11, HH-P12, HH-P13 and HH-P14 as currently drafted in the proposed district plan.	Retain Policy HH-P13 or ensure that amendments include similar wording that achieves the same intent
<b>Transpower New Zealand Ltd (S454)</b>	S454.078	Historic heritage	HH-P13	Support	Transpower supports the inclusion of this policy in the FNPDP.	Retain Policy HH-P13
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.123	Historic heritage	HH-P14	Support	Federated Farmers supports policies HH-P1, HH-P3, HH-P4, HH-P5, HH-P7, HH-P9, HH-P10, HH-P11, HH-P12, HH-P13 and HH-P14 as currently drafted in the proposed district plan.	Retain Policy HH-P14 or ensure that amendments include similar wording that achieves the same intent

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<b>Te Runanga o Ngai Takoto Trust (S390)</b>	S390.062	Historic heritage	HH-P15	Oppose	The submitter opposes policy HH-P15 and considers loss and degradation of heritage resources includes the loss of access to these resources. Clarity is sought on how Council proposes to provide access/legal right/physical access for tāngata whenua to their heritage, sites of significance and the like to maintain and carry out their cultural processes and procedures for current and future generations.	Amend policy HH-P15 by adding a new clause as follows: <b>(q) opportunities to create access (by rights of way or other methods) for tangata whenua to their sites of significance, to enable them to maintain and carry out their cultural processes and procedures for current and future generations.</b>
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.051	Historic heritage	HH-P15	Support	Point o. of Policy HH-P15 recognises iwi/hapū management plans	Retain point o. of Policy HH-P15
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.128	Historic heritage	HH-P15	Support in part	In respect of policy HH-P15, Federated Farmers is concerned over the intent of the policy which appears to be inconsistent with section 6 of the Resource Management Act 1991. We seek the amendment of the policy to be consistent with the requirements of the Act.	Amend Policy HH-P15 as follows: Manage land use, <b>development</b> and subdivision involving a scheduled heritage resource to address the effects of the activity requiring resource consent, including (but not limited to) consideration of the following matters where relevant to the application: a. <del>the particular heritage values of the scheduled Heritage Resource and its significance</del> <b>the subdivision, land use or development is not inappropriate for the environment is it located in ...</b> or wording with similar intent

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<b>Te Rūnanga o Whaingaroa (S486)</b>	S486.076	Historic heritage	HH-P15	Oppose	Te Rūnanga o Whaingaroa considers loss and degradation of heritage resources includes the loss of access to these resources. We seek clarity on how Council proposes to provide access/legal right/physical access for tāngata whenua to their heritage, sites of significance and the like to maintain and carry out their cultural processes and procedures for current and future generations.	Amend Policy HH-P15 by inserting a new paragraph: <b>(q). opportunities to create access (by rights of way or other methods) for tāngata whenua to their sites of significance, to enable them to maintain and carry out their cultural processes and procedures for current and future generations.</b>
<b>Te Rūnanga Ā Iwi O Ngapuhi (S498)</b>	S498.063	Historic heritage	HH-P15	Oppose	The submitter opposes policy HH-P15 and considers loss and degradation of heritage resources includes the loss of access to these resources. Clarity is sought on how Council proposes to provide access/legal right/physical access for tāngata whenua to their heritage, sites of significance and the like to maintain and carry out their cultural processes and procedures for current and future generations.	Amend policy HH-P15 by adding a new clause as follows: <b>(q) opportunities to create access (by rights of way or other methods) for tangata whenua to their sites of significance, to enable them to maintain and carry out their cultural processes and procedures for current and future generations.</b>
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.004	Historic heritage	Rules	Support	The Proposed Plan is required to recognise and provide for the matters of national importance, in particular 6(f) "the protection of historic heritage from inappropriate subdivision, use and development" and s6(e) "the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga." HNZPT considers that the hybrid-plan format of the Proposed Plan, that includes: the identification of historic heritage; heritage area overlays; Kororareka Russell Township	Retain the historic heritage rules



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					Zone and Sites and Areas of Significance to Maori issues (Overview), objectives, policies and rules each within a Section of the plan, is of assistance to the reader in understanding the background and reasons for the rules.	
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.029	Historic heritage	Rules	Support in part	Rules to recognise the importance of dry stone walls would be appropriate.	Insert a new rule as follows: <b>HH-RXXX Maintenance and repair of Existing Dry Stone WallsAll zones Outside of Heritage Area overlays Activity status: PermittedWhere:PER-1Works to existing dry stone walls are to:</b> <b>i. Maintenance or repair works in situ using traditional methods, design and materials.</b> <b>ii. Removal of up to a total of 6m length of wall per site for access purposes only, where no alternative access exists.</b> <b>Activity status where compliance not achieved - Reter to Rule HH-R2.</b>
<b>Northland Planning and Development 2020 Limited (S502)</b>	S502.028	Historic heritage	HH-R1	Support in part	There are times where a fence, or deck which is part of a Heritage Building may be repaired and as part of this it may not be painted, rather it may be left as a natural product or stained. We seek to add in 'if painted' to cover this particular scenario.	Amend HH-R1 PER-1 The exterior facades of all buildings or structures where the existing colour scheme is to be changed, must <b>if painted</b> be finished in accordance with the colour scheme from the following paint ranges or equivalent: i. resene heritage colours; ii. resene whites and neutrals; iv. resene colour range BS5252

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						(A01-C40 range).
<b>Waitangi Limited (S503)</b>	S503.026	Historic heritage	HH-R1	Not Stated	There are times where a fence, or deck which is part of a Heritage Building may be repaired and as part of this it may not be painted, rather it may be left as a natural product or stained. We seek to add in 'if painted' to cover this particular scenario.	Amend PER-1 of Rule HH-R1 as follows: The exterior facades of all buildings or structures where the existing colour scheme is to be changed, must <b>if painted</b> be finished in accordance with the colour scheme from the following paint ranges or equivalent...
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.025	Historic heritage	HH-R2	Support in part	The restricted discretionary wording for Rule HH-R2 should reference reversibility and the content of any conservation plan.	Amend Rule HH-R2 to include the following (or words to that effect): Matters of discretion are restricted to: <b>xxx. The extent to which any changes are consistent with a relevant Conservation Plan informed by the /COMOS New Zealand Charter 2010.xxx. The extent to which the changes are reversible.</b>
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.026	Historic heritage	HH-R3	Support in part	The matters over which control is reserved in Rule HH-R3 should refer to the reversibility of what is proposed.	Amend subsection a of Rule HH-R3 as follows (or words to that effect): a. Methodologies used to protect and maintain heritage values, including <b>reversibility and</b> integration with other scheduled Heritage Resources on the site or surrounding area;

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<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.027	Historic heritage	HH-R4	Support in part	The HNZPT non-statutory Sustainable Management of Historic Heritage Guidance Series: Guide to the Management of Historic Heritage: District Plans (April 2022) recommends restricted discretionary activity status for new structures within scheduled sites. While this is the case in the PDP for sites within Heritage area overlays, PDP Rule HH-R4 is problematic where an existing or future item may be located outside of these and changes including new structures are a permitted activity.	Amend PER-1 of Rule HH-R4 as follows (or words to that effect): <del>Any new buildings or structures, additions or alterations are setback a minimum of 20m from a scheduled Heritage Resource.</del> <b>This rule shall not apply to domestic small scale renewable electricity generation, and connections to buildings or structures for network utilities.</b>
<b>Northland Planning and Development 2020 Limited (S502)</b>	S502.029	Historic heritage	HH-R4	Support in part	The relevant authorizing authority or authorities will be able to determine if any adverse effects will be created on the scheduled heritage resource, such that if written approval is received from such authorities, application through the resource consenting process should not be required. At times there will be very minor structures which will be placed on a site within 20m of a heritage building which will have no adverse impacts. Where this is the case, an option should be made available such that with the approval of the relevant party no consent is required. Obtaining approval from the relevant party will ensure that the pertinent issues within the matters of discretion listed within this rule are adhered to.	Amend HH-R4 PER-1 Any new buildings or structures, additions or alterations are setback a minimum of 20m from a scheduled Heritage Resource <b>unless written approval has been received by the relevant authorising authority or authorities (Heritage New Zealand Pouhere Taonga, Department of Conservation and Tangata Whenua).</b>
<b>Waitangi Limited (S503)</b>	S503.027	Historic heritage	HH-R4	Not Stated	Heritage New Zealand will be able to determine if any adverse effects will be created on the scheduled heritage resource, such that if written approval is received from them an application through the resource consenting process should not be required. Similar to the examples above, at times there will be very minor structures which will be	Amend Rule HH-R4 as follows: Any new buildings or structures, additions or alterations are setback a minimum of 20m from a scheduled Heritage Resource <b>with the exception of the Waitangi Estate where written approval has been</b>

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					<p>placed on a site within 20m of a heritage building which will have no adverse impacts. Where this is the case, an option should be made available such that with the approval of the relevant party no consent is required. Obtaining approval from the relevant party will ensure that the pertinent issues within the matters of discretion listed within this rule are adhered to.</p>	<p><b>received by Heritage New Zealand Pouhere Taonga.</b></p>
<p><b>Heritage New Zealand Pouhere Taonga (S409)</b></p>	<p>S409.028</p>	<p>Historic heritage</p>	<p>HH-R5</p>	<p>Support in part</p>	<p>Rule HH-R5 is problematic where an existing or future item may be located outside of Heritage Area overlays Rule HA-R5 PER-2 and PER-3 that have 2m<sup>3</sup>, 5m<sup>2</sup> and 200m<sup>3</sup> thresholds. It is acknowledged that even small excavations can have large impacts on archaeology. Permitted earthworks within the setting of a heritage item has the potential to damage the heritage values of the item as well as any archaeology where the extent of the place has not been mapped in a Plan and/ or the setting is not well understood.</p> <p>Rule HH-R5 relies upon the Standard EW-S3 Standard Accidental Discovery protocol and quantity thresholds generally in the zone for the avoidance of archaeology.</p> <p>The requested addition in this submission of ArchSite, the online version of the New Zealand Archaeological Association's Site recording Scheme, as an information Map Layer tool within the GIS system, would help to avoid recorded archaeology when undertaking earthworks within a scheduled Heritage Resource setting and elsewhere.</p> <p>For consistency purposes, Rule HH-R5 should at the very least be consistent with Rule HA-RS PER-3 that is itself permissive in that 200m<sup>3</sup> is a standard Residential zone quantity threshold for earthworks in district plans.</p> <p>Reference should be made in Rule HH-R5 and in the Heritage Area overlays earthwork</p>	<p>Amend Rule HH-R5 as follows (or words to that effect):</p> <p><del>PER-1 Any earthworks are setback a minimum of 20m from a scheduled Heritage Resource.</del></p> <p><b>The earthworks</b></p> <ol style="list-style-type: none"> <li><b>1. Do not exceed 100m<sup>3</sup></b></li> <li><b>2. Are not within 20m of a Scheduled Heritage Resource or an archaeological site</b></li> <li><b>3. Comply with EW-S3 Accidental Discovery Protocol</b></li> </ol> <p>This rule does not apply to earthworks associated with burials within an existing cemetery.</p> <p><b>Note: In addition to the requirements of the District Plan, it should be noted that the Heritage New Zealand Pouhere Taonga Act 2014 ("HNZPTA") requires all applicants to obtain an authority from the HNZPTA before any archaeological site is modified or destroyed. This is the case regardless of whether the land on which the site is</b></p>

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					Rules to the setback distance from an archaeological site and not just a Scheduled heritage resource. Standard HA-S3 Accidental discovery protocol refers to a 20m setback for works to cease upon the discovery of any suspected sensitive material.	<b>located is designated, or the activity is permitted under the District Plan or a resource or building consent has been granted.</b>
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.129	Historic heritage	HH-R5	Support	Federated Farmers supports this rule as currently drafted as the setback for earthworks from a scheduled Heritage Resource of 20m is consistent with other setbacks for heritage area overlays.	Retain Rule HH-R5 or ensure that amendments include similar wording that achieves the same intent
<b>Northland Planning and Development 2020 Limited (S502)</b>	S502.030	Historic heritage	HH-R5	Support in part	The definition of earthworks is now all encompassing such that minor works are now defined as earthworks in the plan. Works such as putting in a path or trenching of cables are generally so minor that they should not require consent. Provision has been made for minor earthworks to be undertaken on site without triggering resource consent. A volume of 50m <sup>3</sup> has been adapted as anything less than 50m <sup>3</sup> doesn't trigger the Control of Earthworks bylaw.	Amend HH-R5 PER-1 Any earthworks are setback a minimum of 20m from a scheduled Heritage Resource. This rule does not apply to earthworks associated with burials within an existing cemetery <b>or minor earthworks under 50m<sup>3</sup> volume with a cut/fill face of less than 0.5 metres.</b>
<b>Waitangi Limited (S503)</b>	S503.028	Historic heritage	HH-R5	Not Stated	The definition of earthworks is now all encompassing such that minor works are now defined as earthworks in the plan. Works such as putting in a path or trenching of cables are generally so minor that they should not require consent. Provision has been made for minor earthworks to be undertaken on site without triggering resource consent. A volume of 50m <sup>3</sup> has been adapted as anything less than 50m <sup>3</sup> doesn't trigger the Control of Earthworks bylaw.	Amend Rule HH-R5 as follows: ... This rule does not apply to earthworks associated with burials within an existing cemetery <b>or minor earthworks under 50m<sup>3</sup> volume with a cut/fill face of less than 0.5 metres.</b>

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<b>Chorus New Zealand Limited, Spark New Zealand Trading Limited, Spark TowerCo Limited, Vodafone New Zealand Limited (S282)</b>	S282.011	Historic heritage	HH-R6	Support in part	While rule HH-R6 states that it does not apply to connections to buildings or structures for network utilities, there are no other rules in this section that would otherwise allow these activities and as such it would appear the intent is to allow for such connections as permitted activities.	Insert new rule to allow connections to buildings or structures for network utilities as permitted activities.
<b>Top Energy Limited (S483)</b>	S483.127	Historic heritage	HH-R6	Oppose	Top Energy opposes a discretionary activity status for infrastructure related activities within a site containing a Heritage Resource. Ensuring electricity connection to this resource is critical to ensuring they are looked after, are functional and safe. Top Energy considers that it is better to manage the effects of activities on sensitive resources through performance standards relating to earthworks and buildings and structures. Accordingly, Top Energy seek that HH-R10 be deleted, or amended to exclude network utilities and that HH-R4 and HHR5 be relied on instead to manage any adverse effects associated with the built form of network utilities.	Delete Rule HH-R6
<b>Top Energy Limited (S483)</b>	S483.189	Historic heritage	HH-R8	Support	Top Energy considers that there is a lack of clarity throughout the PDP in terms of how the Chapters interact with each other, and some consistency. The Overlay chapters are one example and are inconsistent with respect to referencing rules for "activities not otherwise listed". The How the Plan Works chapter includes a statement that indicates some overlays will automatically default to a permitted activity, however resource consent may still be	Amend all relevant overlay chapters as necessary to insert rules for "Activities not otherwise listed in this chapter", consistent with zone chapters.

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					<p>required under other Part 2: District-wide Matters chapters and/or Part 3: Area-Specific chapters (including the underlying zone). Some Chapters include notes which provide some clarity in this regard (e.g. Heritage Overlay) however this isn't consistently applied through the overlays or the District Wide Chapters generally.</p> <p>Some overlays include a catch all 'activities not otherwise specified' activity status (e.g. Treaty Settlement Land Overlay). Some overlays don't.</p> <p>This lack of consistency (coupled with inconsistent terminology) will cause confusion for Plan users and ultimately, impact the integrity of the plan. This is particularly relevant in the Overlay chapters where each Overlay chapter has a different approach to activity status default rules. With specific regard to the permitted activity default, it is noted that this could lead unintentional consequences.</p>	
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.030	Historic heritage	HH-R10	Support	<p>The HNZPT non-statutory Sustainable Management of Historic Heritage Guidance Series: Guide to the Management of Historic Heritage: District Plans (April 2022) recommends demolition or full destruction of a protected part of scheduled historic heritage should have at least non-complying status for the most significant heritage and discretionary activity status for other heritage.</p> <p>Prohibited Activity status for the Demolition or relocation of the Scheduled Heritage Resources given their significance is appropriate</p>	Retain Rule HH-R10
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.130	Notable trees	Overview	Not Stated	<p>Federated Farmers supports the recognition and identification of notable trees which are of importance to the district and its communities. However, it is considered that it will be important if the notable tree/s is/are located on private land that engagement</p>	<p>Amend the Overview to include a sentence that discusses the need for engagement to occur between the Council and landowners over how best to achieve the protection of a notable tree or trees</p>

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					between the Council and landowners needs to occur to ensure that the tree is best managed for future generations. This can be achieved through a mixture of regulatory and non-regulatory methods.	or wording with similar intent
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.054	Notable trees	NT-01	Support	not stated	Retain NT-01 as notified
<b>Top Energy Limited (S483)</b>	S483.128	Notable trees	NT-01	Not Stated	It is important that the protection of notable trees is balanced with enabling the safe and efficient use, development, maintenance, operation and upgrading of infrastructure and network utilities. Top Energy considers that NT-01 should be amended to include wording to this effect.	Amend Objective NT-O1 as follows: Notable Trees and groups of trees which contribute to the botanical, ecological, historical, cultural or amenity value of the District are identified and protected, <b>while enabling the safe and efficient use, development, maintenance, operation, repair and upgrading of infrastructure and network utilities.</b>
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.054	Notable trees	NT-P1	Not Stated	Point b. of Policy NT-P1 requires that the STEM assessment be taken into account when considering cultural values. The STEM assessment is irrelevant to an assessment of cultural values.	Amend point b. of Policy NT-P1 as follows: The tree or group of trees have significant cultural values <b>and are identified in either the relevant iwi/hapū management plan or in a Cultural Impact Assessment for the site,</b> <del>taking into account any assessment undertaken under the STEM including heritage, amenity, botanical and/or ecological values.</del>
<b>Transpower New Zealand Ltd (S454)</b>	S454.079	Notable trees	NT-P2	Support	Transpower supports the inclusion of a notable trees policy to address works that	Amend Policy NT-P2 as follows: Enable the pruning and trimming of <b>branches notable trees</b>



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					need to occur on notable trees to maintain the National Grid.	<p>where the works will:</p> <ul style="list-style-type: none"> <li>a. retain or improve the health of the notable tree;</li> <li>b. allow the regular maintenance of the notable tree;</li> <li>c. <del>will</del> improve public safety, or prevent damage to property or infrastructure;</li> <li>d. control any other maintenance works to ensure that the works will:               <ul style="list-style-type: none"> <li>i. maintain the health, form and shape of the tree; and</li> <li>ii. be supervised or undertaken by a suitably qualified and experienced arborist</li> </ul> </li> </ul>
<p><b>Top Energy Limited (S483)</b></p>	S483.129	Notable trees	NT-P2	Not Stated	It is important that this policy refers to notable trees specifically, and enables safe and efficient use and operation of infrastructure or network utilities.	<p>Amend Policy NT-P2 as follows:            Enable the pruning and trimming of branches <b>on Notable Trees</b> where the works will:</p> <ul style="list-style-type: none"> <li>a. retain or improve the health of the notable tree; <b>and</b></li> <li>b. allow the regular <b>maintenance pruning</b> of the notable tree; <b>or</b></li> <li>c. will improve public safety, or prevent damage to property or infrastructure; <b>or</b></li> <li>d. <b>Enable the safe and efficient use and operation of infrastructure or network utilities.</b></li> <li>e. control any other maintenance works to ensure</li> </ul>

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						that the works will: i. maintain the health, form and shape of the tree; and ii. be supervised or undertaken by a suitably qualified and experienced arborist.
Ministry of Education Te Tāhuhu o Te Mātauranga (S331)	S331.040	Notable trees	NT-P3	Support	The submitter supports policy NT-P3 and acknowledges the historic heritage, amenity, cultural, botanical or ecological values of notable trees. However, there may be an operational need to locate educational facilities within the root zone area of a notable tree or group of trees.	Retain policy NT-P3, as proposed.
Transpower New Zealand Ltd (S454)	S454.080	Notable trees	NT-P3	Support	Transpower supports the inclusion of this policy in the FNPDP	Retain Policy NT-P3
Top Energy Limited (S483)	S483.130	Notable trees	NT-P3	Not Stated	Top Energy considers that this policy needs to expressly refer to infrastructure and that it should be 'or' between a and b, not 'and.'	Amend Policy NT-P3 as follows: Only allow activity, <b>infrastructure</b> <del>and or</del> development within the root zone area of a notable tree or group of trees where: a. it is demonstrated that the activity, <b>infrastructure</b> <del>and or</del> development will not be detrimental to the long-term health and significance of the tree or group of trees; <del>and or</del> b. there is a functional or operational need for the <b>activity, infrastructure or</b> development to occur within the root protection area and there are no other practical alternative locations.

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Transpower New Zealand Ltd (S454)	S454.081	Notable trees	NT-P4	Support	Transpower supports the inclusion of this policy in the FNPD.	Retain Policy NT-P4
Top Energy Limited (S483)	S483.131	Notable trees	NT-P4	Support	Top Energy support this policy as proposed	Retain Policy NT-P4
Waka Kotahi NZ Transport Agency (S356)	S356.055	Notable trees	NT-P5	Support	not stated	Retain NT-P5 as notified
Te Runanga o Ngai Takoto Trust (S390)	S390.064	Notable trees	NT-P5	Support	The submitter supports policy NT-P5 but seeks a stronger policy direction and compliance measures when dealing with Notable Tree matters. This is in response to both historic and recent cases where significant trees have been destroyed or tampered with, without any recourse.	Amend policy NT-P5 to implement stronger Council approaches to monitoring and enforcement.
Top Energy Limited (S483)	S483.132	Notable trees	NT-P5	Not Stated	The wording of this policy needs to be updated to include direction on infrastructure for the removal of trees. In Top Energy's opinion, it is important that tree removal is provided for where it poses a serious threat to not just public safety, but also the safe and efficient use and operation of infrastructure or network utilities.	Amend point a of Policy NT-P5 as follows: a. there is an imminent threat to the safety of people and property, <b>or to the safe and efficient use and operation of infrastructure or network utilities;</b> or
Te Rūnanga o Whaingaroa (S486)	S486.078	Notable trees	NT-P5	Support	Te Rūnanga o Whaingaroa would further seek a stronger policy direction and compliance measures when dealing with Notable Tree matters. This is in response to both historic and recent cases where significant trees have been destroyed or tampered with, without any recourse.	Retain Policy NT-P5 but implement stronger Council approaches to monitoring and enforcement.
Te Rūnanga Ā Iwi O Ngapuhi (S498)	S498.065	Notable trees	NT-P5	Support	The submitter supports policy NT-P5 but seeks a stronger policy direction and compliance measures when dealing with Notable Tree matters. This is in response to both historic and recent cases where significant trees have been destroyed or tampered with, without any recourse.	Amend policy NT-P5 to implement stronger Council approaches to monitoring and enforcement.

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<b>Te Hiku Iwi Development Trust (S399)</b>	S399.055	Notable trees	NT-P6	Not Stated	We support consideration of any relevant iwi/hapū management plan and any consultation with tangata whenua, but consider that "giving consideration" to a matter may still lead to undesirable outcomes. We prefer that these matters be "given regard to" or better yet "given effect to"	Amend Policy NT-P6, in particular point o., as follows: Manage land use and subdivision involving a notable tree or trees to address the effects of the activity requiring resource consent, including (but not limited to) <del>consideration of</del> <b>having regard to</b> the following matters where relevant to the application: ..... o) <b>any Cultural Impact Assessment and</b> any consultation with tangata whenua; and ....
<b>Top Energy Limited (S483)</b>	S483.133	Notable trees	NT-P6	Support	Top Energy generally support the inclusion of this policy regarding potentially relevant matters for the consideration of resource consents under this chapter	Retain Policy NT-P6
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.131	Notable trees	NT-R1	Support	Federated Farmers opposes Rule NT-R1 as it is currently drafted in the proposed district plan. The rule does not provide for mechanical cultivation within the rootzone of a notable tree or trees as a permitted activity. A rootzone area can be 3 times the area of the trees canopy and can vary significantly between tree species. Federated Farmers recommends that the rule is amended to provide for mechanical cultivation within the rootzone area. As well, it is recommended that the Council uses the term 'tree protection zone' instead of the rootzone area. The term 'tree protection zone' is used in a number of plans and policies in New Zealand. It is a term that is recognised by suitably qualified arborists and can easily be calculated by (a) canopy drip line + 1m; (b) trunk diameter at 1.4m	Amend Rule NT-R1 as follows: NT-R1 Gardening, mowing and cultivation within the <del>rootzone area</del> <b>Tree Protection Area</b> of a notable tree or trees  Activity status: Permitted  Where:  PER-1  It does not: <del>a. involve mechanical cultivation;</del> ...

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					height multiplied by 12; and (c) tall narrow trees = ½ x Height. The tree protection zone will ensure that areas critical to the tree's health are protected and that resource users are able to understand the setbacks required.	or wording with similar intent
<b>Top Energy Limited (S483)</b>	S483.134	Notable trees	NT-R1	Support	Top Energy supports this provision as notified.	Retain Rule NT-R1
<b>Northland Planning and Development 2020 Limited (S502)</b>	S502.045	Notable trees	NT-R1	Support in part	We have sought the removal of 'or trees' as this rule should only apply to notable trees. Confirmation is sought regarding existing pathways. Where these are sealed but may have cracked, we seek relief that they can be resealed or repaved without consent? We have added in the words 'of new pathways' to try and capture the formation of new pathways only.	Amend NT-R1 NT-R1 Gardening, mowing and cultivation within the rootzone area of a notable tree <del>or trees</del> Where: PER-1 It does not: 1. involve mechanical cultivation; 2. include sealing or paving of <b>new pathways</b> ; 3. involve the release, injection or placement of chemicals or toxic substances; 4. involve planting of trees; and 5. involve altering of the existing ground level or the disturbance of land other than to the extent necessary to undertake gardening
<b>Waitangi Limited (S503)</b>	S503.029	Notable trees	NT-R1	Not Stated	We have sought the removal of 'or trees' as this rule should only apply to notable trees. Confirmation is sought regarding existing pathways. Where these are sealed but may have cracked, we seek relief that they can be resealed or repaved without consent? We have added in the words 'of new pathways' to try and capture the	Amend Rule NT-R1 as follows: NT-R1 Gardening, mowing and cultivation within the rootzone area of a notable tree <del>or trees</del> ... It does not: 1. ...

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					formation of new pathways only. Within item 4 the Waitangi Treaty Grounds has been excluded as trees which have significance tend to be planted in close proximity to each other and within the root zones of each other	<ol style="list-style-type: none"> <li>2. include sealing or paving <b>of new pathways;</b></li> <li>3. ...</li> <li>4. involve planting of trees <b>with the exception of the Waitangi Treaty Grounds;</b> and ...</li> <li>5.</li> </ol>
<b>Top Energy Limited (S483)</b>	S483.135	Notable trees	NT-R2	Not Stated	<p>Top Energy notes there are issues with the wording of this rule that need to be addressed including:</p> <ul style="list-style-type: none"> <li>- That the restriction on branch diameter to 50mm is unnecessarily restrictive, and inconsistent with other recent district plans in Northland. Top Energy considers that 200mm is a more reasonable branch diameter. Essentially, to maintain a notable tree adjacent to Top Energy assets at 50mm diameter, we would need to prune it annually, which is chargeable to FNDC (after the first trim) or FNDC need to employ someone to prune it annually. Trimming allowances need to be increased to provide for this.</li> <li>- Provision should be made for emergency tree works with no limit on root or branch diameter, in accordance with the definition sought by Top Energy in the Definitions Section.</li> </ul>	<p>Amend PER-1 of Rule NT-R2 and insert new requirement as follows (or to the same effect):</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p>The maximum branch diameter must not exceed <del>5</del><b>200</b>mm at severance...</p> <p><b>PER-XIf the pruning or trimming is required as emergency tree works, PER-1-6 above do not apply.</b></p>
<b>Top Energy Limited (S483)</b>	S483.136	Notable trees	NT-R3	Support	Top Energy supports this provision as notified.	Retain Rule NT-R3
<b>Top Energy Limited (S483)</b>	S483.137	Notable trees	NT-R4	Support	Top Energy supports the permitted activity status for pruning of notable trees close to existing electricity lines however considers	Amend Rule NT-R4 to delete PER-2 and PER-3., being <del>PER-2The works</del>

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					that clauses PER-2 and PER-3 should be deleted. The works are administered by Top Energy and other parties in accordance with the regulations, and imposing a separate requirement on the qualification level of the arborist is unnecessary. Furthermore, such tree works can be many, and requiring a notification to FNDC for these works is unnecessary and will flood FNDC with information that is ultimately not required	<del>must be undertaken or supervised by a person that complies with NT-S1 Qualified Arborist – Level 4. PER-3 Council is advised 14 days prior to the work commencing and is provided with written documentation by the arborist undertaking or supervising that they have the qualifications required by NT-S2 Qualified Arborist – Level 6</del>
<b>Top Energy Limited (S483)</b>	S483.138	Notable trees	NT-R5	Support	Top Energy supports this provision as notified, apart from clause PER-1 which requires the infrastructure to be greater than 1m below ground level. This is inconsistent with the 800mm for directional drilling provided for in NT-R6, and also inconsistent with the 650mm provided for in TREE-R2 of the Whangārei District Plan Notable Tree Chapter.	Amend point 1. of Rule NT-R5 (inferred) as follows: 1. is at least <del>1m</del> <b>650mm</b> below ground level;
<b>Top Energy Limited (S483)</b>	S483.139	Notable trees	NT-R8	Not Stated	Top Energy considers that provision needs to be made for the removal of a notable tree that constitutes emergency tree works in accordance with the definition sought earlier.	Amend NT-R8 as follows (or to the same effect): Removal or relocation of a notable tree Activity status: <b>Discretionary Permitted</b> <b>Where: PER-1</b> <b>The removal is required as emergency tree works.</b> Activity status where compliance not achieved: <del>Not applicable</del> <b>Discretionary</b>
<b>Top Energy Limited (S483)</b>	S483.190	Notable trees	NT-R9	Support	Top Energy considers that there is a lack of clarity throughout the PDP in terms of how the Chapters interact with each other, and	Amend all relevant overlay chapters as necessary to insert rules for "Activities not otherwise listed in this

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					<p>some consistency.</p> <p>The Overlay chapters are one example and are inconsistent with respect to referencing rules for "activities not otherwise listed". The How the Plan Works chapter includes a statement that indicates some overlays will automatically default to a permitted activity, however resource consent may still be required under other Part 2: District-wide Matters chapters and/or Part 3: Area-Specific chapters (including the underlying zone). Some Chapters include notes which provide some clarity in this regard (e.g. Heritage Overlay) however this isn't consistently applied through the overlays or the District Wide Chapters generally.</p> <p>Some overlays include a catch all 'activities not otherwise specified' activity status (e.g. Treaty Settlement Land Overlay). Some overlays don't.</p> <p>This lack of consistency (coupled with inconsistent terminology) will cause confusion for Plan users and ultimately, impact the integrity of the plan. This is particularly relevant in the Overlay chapters where each Overlay chapter has a different approach to activity status default rules. With specific regard to the permitted activity default, it is noted that this could lead unintentional consequences.</p>	<p>chapter", consistent with zone chapters.</p>
<p><b>Creative Northland (S300)</b></p>	<p>S300.002</p>	<p>Sites and areas of significance to Māori</p>	<p>Overview</p>	<p>Support</p>	<p>Creative Northland supports the acknowledgement of sites significant to Maori.</p> <p>We advocate for culture and history to be evident within the community and see opportunity for Creative Northland to help support these discussions at the table and help assist outcomes to consider creative consideration and plans to link into the destination management plan for the region.</p>	<p>Amend PDP to have specific sites identified with an action and upkeep maintenance strategy.</p> <p>Creative Northland can help form action outcomes with council as part of the strategy for arts, heritage and culture to help keep history and culture supported in the LTP across the region for the future communities to understand, enjoy and celebrate cultural and historic significance.</p>



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<b>Opononi Area School (S388)</b>	S388.001	Sites and areas of significance to Māori	Overview	Support	There is no public cemetery in the Opononi area, The Pakanae cemetery, known as "Ro Iho" is the only cemetery in the area from Koutu to Waiwhatawhata and it is a Māori cemetery. The names of the Urupā have changed over the centuries. Nga Hapu o Te Wahapu have authority to make decisions about who is buried there, where they are buried and upholding Tikanga. Refer to submission.	Amend to seek Council to provide support and resourcing in the PDP to preserve the cultural heritage and Taonga that is Ro Iho Urupā, and to provide support and resourcing to Māori people of the area in developing a Māori cemetery in their local area.
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.132	Sites and areas of significance to Māori	Overview	Support in part	<p>Federated Farmers fully supports the identification and protection of wāhi tapu, wāhi taonga and sites and areas of significance to Māori. What the overview does not highlight is that the identification and protection occurs as a result of effective engagement and a sound partnership between the Council, tangata whenua and the landowner where the wāhi tapu, wāhi taonga and sites and areas of significance are located. It is disappointing that the Council appears to only be prepared to use regulatory methods via consent processes to create opportunities for good faith and understanding to develop.</p> <p>Landowners appreciate being treated as a partner as well as being recognised as a directly affected party. Landowners should have more of a say in matters such as these as they are not someone with no greater rights than those of the general public. Council needs to be prepared to provide sufficient information to landowners on the location and extent of sites or areas of Significance to Māori on their property needs to be provided so that they are aware of any restrictions that apply and any obligations that they may have. Council should be working to facilitate better outcomes so that the best possible outcomes are achieved.</p>	<p>Amend the Overview to include:</p> <ul style="list-style-type: none"> <li>appropriate wording that recognises the role that landowners of private property have to play in the identification and protection of sites and areas of significance to Māori</li> <li>appropriate wording which essentially states that the Council will play a major role in facilitating a partnership and promoting effective engagement between tangata whenua, landowners and the Council in the identification and protection of sites and areas of significance to Māori</li> </ul>

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<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.011	Sites and areas of significance to Māori	Objectives	Support	The Proposed Plan is required to recognise and provide for the matters of national importance, in particular 6(f) "the protection of historic heritage from inappropriate subdivision, use and development" and s6(e) "the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga." HNZPT considers that the hybrid-plan format of the Proposed Plan, that includes: the identification of historic heritage; heritage area overlays; Kororareka Russell Township Zone and Sites and Areas of Significance to Maori issues (Overview), objectives, policies and rules each within a Section of the plan, is of assistance to the reader in understanding the background and reasons for the rules.	Retain the objectives for Sites and Areas of Significance to Maori
<b>Top Energy Limited (S483)</b>	S483.140	Sites and areas of significance to Māori	Objectives	Not Stated	Top Energy support the acknowledgement. importance and significance of these sites to tangata whenua/mana whenua. Top Energy acknowledge that the purpose of this Chapter is to protect these sites from inappropriate subdivision and development. However, in some instances there is an operational and functional need for infrastructure to be located within areas identified as being of significance to Māori, particularly given the extent that some of these areas cover.	Insert additional objectives and policies that recognises the need for the location of new infrastructure, within Sites and Areas of Significance to Māori where there is an operational and functional need and any adverse effects are adequately managed.
<b>Top Energy Limited (S483)</b>	S483.142	Sites and areas of significance to Māori	Objectives	Not Stated	Top Energy support the acknowledgement. importance and significance of these sites to tangata whenua/mana whenua. Top Energy acknowledge that the purpose of this Chapter is to protect these sites from inappropriate subdivision and development. However, in some instances there is an operational and functional need for infrastructure to be located within areas identified as being of significance to Māori, particularly given the extent that some of these areas cover.	Insert additional objective and policy that provides for the operation, maintenance repair and upgrading of infrastructure within sites and areas of significance to Māori.

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Waka Kotahi NZ Transport Agency (S356)	S356.056	Sites and areas of significance to Māori	SASM-O1	Support	not stated	Retain SASM-O1 as notified
Haititaimaran gai Marae Kaitiaki Trust (S394)	S394.019	Sites and areas of significance to Māori	SASM-O1	Support in part	In accord with tikanga, it may not be culturally appropriate to identify sites of significance in some instances. Protection of culturally significant areas is important for past, current and future generations.	Amend Objective SASM-O1 as follows: Sites and areas of significance to Māori are identified <b>where culturally appropriate</b> , recognised and managed, to ensure their <del>long term</del> protection <del>for future generations</del> .
Waka Kotahi NZ Transport Agency (S356)	S356.057	Sites and areas of significance to Māori	SASM-O2	Support	not stated	Retain SASM-O2 as notified
Haititaimaran gai Marae Kaitiaki Trust (S394)	S394.020	Sites and areas of significance to Māori	SASM-O2	Support in part	The culture and traditions that tangata whenua have with sites must also be recognised and provided for under s6(e) RMA. While future generations are important and a principal consideration, tangata whenua culture, traditions and relationships warrant recognition, provision and protection in and of themselves.	Amend Objective SASM-O2 as follows: The <b>culture, traditions and</b> relationship of tangata whenua with sites and areas of significance <del>to Māori is</del> <b>are</b> recognised and provided for, <del>to ensure its protection for future generations</del> .
Te Runanga o Ngai Takoto Trust (S390)	S390.063	Sites and areas of significance to Māori	SASM-O4	Oppose	The submitter opposes objective SASAM-O4 and considers that it needs to be qualified in terms of having such areas 'acknowledged by the wider community'.	Amend objective SASM-O4 to read as follows: Sites and areas of significance to Māori are known to, appreciated by, and acknowledged as important to, the wider community, <b>where this is considered appropriate by tāngata whenua</b> .

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Haititaimaran gai Marae Kaitiaki Trust (S394)	S394.021	Sites and areas of significance to Māori	SASM-O4	Support in part	In accord with tikanga, it may not be appropriate for tangata whenua to identify sites or areas of cultural significance. Tangata whenua culture, traditions and ancestral relationships must be recognised and provided for under s 6(e) RMA.	Amend Objective SASM-O4 as follows: <b>Where appropriate, S</b> sites and areas of significance to Māori are known to, appreciated by, and acknowledged as important to, the wider community.
Te Rūnanga o Whaingaroa (S486)	S486.077	Sites and areas of significance to Māori	SASM-O4	Oppose	In terms of Sites and Areas of Significance to Māori, we believe SASM-O4 needs to be qualified in terms of having such areas 'acknowledged by the wider community'.	Amend Objective SASM-O4 as follows: Sites and areas of significance to Māori are known to, appreciated by, and acknowledged as important to, the wider community, <b>where this is considered appropriate by tāngata whenua</b>
Te Rūnanga Ā Iwi O Ngapuhi (S498)	S498.064	Sites and areas of significance to Māori	SASM-O4	Oppose	The submitter opposes objective SASAM-O4 and considers that it needs to be qualified in terms of having such areas 'acknowledged by the wider community'.	Amend objective SASM-O4 to read as follows: Sites and areas of significance to Māori are known to, appreciated by, and acknowledged as important to, the wider community, <b>where this is considered appropriate by tāngata whenua.</b>
Te Hiku Iwi Development Trust (S399)	S399.056	Sites and areas of significance to Māori	Policies	Not Stated	We recognise that Te Rautaki o Te Oneroa-a-Tōhe/ Te Oneroa-a-Tōhe Beach Management Plan is provided for in national legislation. We note that there is also specific legislation requiring Councils to take iwi/hapū management plans into account. Preparation of environmental management plans represents a significant commitment on behalf of the iwi/hapū that prepared the plan. Achieving adoption of the plan has usually involved numerous hui and multiple drafts of the document and many hours of discussion and contribution by a large	Insert a new policy as follows: <b>Protect and preserve the culturally significant landscapes identified in iwi/hapū management plans held by Council from inappropriate land use, subdivision and development by:</b> a) Identifying the Area of Interest for iwi/hapū management plans on planning

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					<p>number of people. We consider that this commitment, including the financial commitment, should be recognised and that this section is the appropriate place to do it.</p>	<p><b>maps;b) Recognising and providing for the spiritual, cultural and historical relationship of iwi/hapū with the area identified in the plan(s);c) requiring that resource consent applications within or adjacent to the sites identified as significant within the relevant iwi/hapū management plan demonstrate that they have had regard to that Management Plan;d) provide an assessment of consistency with the vision, objectives and desired outcomes outlined in the Management Plan;e) provide an assessment of effects on values identified in the plan and provide, where relevant, evidence of outcomes of consultation with and/or cultural advice provided by tangata whenua.f) considering the relevant iwi authority or hapū as an affected person for any activity within the area where the adverse effects are considered minor or more than minor.</b></p>
<p><b>Heritage New Zealand Pouhere</b></p>	<p>S409.012</p>	<p>Sites and areas of</p>	<p>Policies</p>	<p>Support</p>	<p>The Proposed Plan is required to recognise and provide for the matters of national importance, in particular 6(f) "the protection</p>	<p>Retain the policies for Sites and Areas of Significance to Maori</p>

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<b>Taonga (S409)</b>		significance to Māori			of historic heritage from inappropriate subdivision, use and development" and s6(e) "the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga." HNZPT considers that the hybrid-plan format of the Proposed Plan, that includes: the identification of historic heritage; heritage area overlays; Kororareka Russell Township Zone and Sites and Areas of Significance to Maori issues (Overview), objectives, policies and rules each within a Section of the plan, is of assistance to the reader in understanding the background and reasons for the rules.	
<b>Transpower New Zealand Ltd (S454)</b>	S454.082	Sites and areas of significance to Māori	Policies	Not Stated	Transpower suggests the inclusion of a policy to address works that need to occur within or near sites or areas of significance to Māori.	Insert new policy SASM-P10 as follows: <b>Recognise and provide for new and existing infrastructure that has a functional or operational need to be located within a site or area of significance to Māori.</b>
<b>Top Energy Limited (S483)</b>	S483.141	Sites and areas of significance to Māori	Policies	Not Stated	Top Energy support the acknowledgement. importance and significance of these sites to tangata whenua/mana whenua. Top Energy acknowledge that the purpose of this Chapter is to protect these sites from inappropriate subdivision and development. However, in some instances there is an operational and functional need for infrastructure to be located within areas identified as being of significance to Māori, particularly given the extent that some of these areas cover.	Insert additional objectives and policies that recognises the need for the location of new infrastructure, within Sites and Areas of Significance to Māori where there is an operational and functional need and any adverse effects are adequately managed.
<b>Top Energy Limited (S483)</b>	S483.143	Sites and areas of significance to Māori	Policies	Not Stated	Top Energy support the acknowledgement. importance and significance of these sites to tangata whenua/mana whenua. Top Energy acknowledge that the purpose of this Chapter is to protect these sites from	Insert additional objective and policy that provides for the operation, maintenance repair and upgrading of infrastructure within sites and areas of

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					inappropriate subdivision and development. However, in some instances there is an operational and functional need for infrastructure to be located within areas identified as being of significance to Māori, particularly given the extent that some of these areas cover.	significance to Māori.
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.058	Sites and areas of significance to Māori	SASM-P1	Support	not stated	Retain SASM-P1 as notified
<b>Merata Kawharu Taituha, Renata Tane, Albie Apiata, Billie Taituha and Hirini Tane (S389)</b>	S389.011	Sites and areas of significance to Māori	SASM-P1	Support in part	Not stated	Amend Policy SASM-P1 as follows: <b>Together with tangata whenua, assist and resource them to identify sites and areas of significance. to Māori in collaboration with tangata whenua, and a</b> Assess their significance <b>and cultural values according to their tikanga and</b> using the criteria in policy 4.5.3 of the Northland Regional Policy Statement 2016.
<b>Haitaitamaran gai Marae Kaitiaki Trust (S394)</b>	S394.022	Sites and areas of significance to Māori	SASM-P1	Oppose	Policy 4.5.3 Northland Regional Policy Statement 2016 relates to historic heritage, not cultural heritage. It is not appropriate to apply a Western assessment to determine the degree of cultural significance. This approach is out of step with s 6(e) RMA. Tangata whenua are best placed to identify the scale of cultural significance of any site.	Delete Policy SASM-P1
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.059	Sites and areas of significance to Māori	SASM-P2	Support in part	Waka Kotahi supports the protection of sites and areas of significance to Maori but is concerned that requiring a Cultural Impact Assessment (CIA) in all cases is not always necessary. Engaging with Manawhenua is key and it is suggested that Manawhenua should decide on when a CIA is necessary.	Amend wording a follows: Protect sites and areas of significance to Māori by: a. ensuring that tangata whenua can actively participate in resource management processes which involve sites and areas of significance to

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						<p>Māori including those identified in Schedule 3 - Sites and areas of significance to Māori;                      b. requiring cultural impact assessments for activities likely to result in adverse effects on scheduled sites and areas of significance to Māori, <b>where Manawhenua consider this appropriate;</b></p>
<p><b>Merata Kawharu Taituha, Renata Tane, Albie Apiata, Billie Taituha and Hirini Tane (S389)</b></p>	<p>S389.012</p>	<p>Sites and areas of significance to Māori</p>	<p>SASM-P2</p>	<p>Support in part</p>	<p>Subpoint (b) - We specifically recommend for a "tangata whenua impact assessment" vs "cultural impact assessment" to be inserted into the policy because as stated above at 19 and 21, in the past, neighbouring hapū have unwittingly provided 'cultural impact assessments' beyond their rohe and into our rohe. While it is their right to give a perspective on their historic connections to whenua, it is not their right to give a tangata whenua perspective. That is completely different.                      Subpoint (d) - We recommend that 'acknowledging' be replaced with 'acknowledging, protecting and integrating mātauranga into practical outcomes' because 'acknowledging' is too weak and does not obligate nor actively encourage action. It needs to be more proactive.                      Subpoint (f) - We recommend that this clause add 'other' to include a broader range of values beyond spiritual or cultural.</p>	<p>Amend Policy SASM-P2 as follows:                      Protect sites and areas of significance to Māori by:</p> <ol style="list-style-type: none"> <li>1. ensuring that tangata whenua can actively participate in resource management processes which involve sites and areas of significance to Māori including those identified in Schedule 3 - Sites and areas of significance to Māori;</li> <li>2. requiring <b>cultural tangata whenua</b> impact assessments for activities likely to result in adverse effects on scheduled sites and areas of significance to Māori;</li> <li>3. recognition of the holistic nature of the Māori worldview and the exercise of kaitiakitanga;</li> <li>4. acknowledging, <b>protecting and integrating</b> matauranga <b>into</b></li> </ol>



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						<p><b>practical outcomes</b>Māori;</p> <p>5. having regard to iwi/Hapu environmental management plans; and</p> <p>6. restricting activities that compromise important spiritual, <del>and</del> <b>cultural or other</b> values held by tangata whenua and/or the wider community.</p>
<p><b>Haititaimaran gai Marae Kaitiaki Trust (S394)</b></p>	<p>S394.023</p>	<p>Sites and areas of significance to Māori</p>	<p>SASM-P2</p>	<p>Support in part</p>	<p>This provision fails to give substance to s 6(e) RMA.                      Requiring appropriate adverse effect management will assist in achieving the above.                      The world view of tangata whenua must be recognised and provided for.                      Mātauranga Māori forms a part of the culture and traditions of tangata whenua. It must also be recognised and provided for, not merely 'acknowledged'.</p>	<p>Amend Policy SASM-P2 as follows:                      Protect sites and areas of significance to Māori by...</p> <p>c. recognition <b>and provision</b> of the holistic nature of the Māori worldview and the exercise of kaitiakitanga;</p> <p>d. <del>acknowledging</del> <b>recognition and provision of</b> matauranga Māori...</p> <p>f. <b>avoiding significant adverse effects on cultural values and</b> restricting activities that compromise important spiritual and cultural values held by tangata whenua and/or the wider community....</p>
<p><b>Haititaimaran gai Marae Kaitiaki Trust (S394)</b></p>	<p>S394.024</p>	<p>Sites and areas of significance to Māori</p>	<p>SASM-P3</p>	<p>Support in part</p>	<p>In accord with tikanga, it may not be appropriate to identify sites of cultural significance.                      The Proposed Plan must recognise and</p>	<p>Amend Policy SASM-P3 as follows:                      Recognise <b>and provide for</b> the relationship that tangata whenua</p>

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					provide for the culture, traditions and relationships that tangata whenua have with their ancestral lands, including any site of significance.	have with <b>their lands, waters and other taonga, including</b> sites and areas of cultural significance to Māori, as the <del>whether or not identified in the</del> Sites and areas of significance to Māori as the party that requested scheduling.
Merata Kawharu Taituha, Renata Tane, Albie Apiata, Billie Taituha and Hirini Tane (S389)	S389.013	Sites and areas of significance to Māori	SASM-P4	Support in part	Not stated	Amend Policy SASM-P4 as follows: <del>Consider</del> <b>Apply</b> the following when assessing applications for land use and subdivision that may result in adverse effects on the relationship of tangata whenua with sites and areas of significance to Māori: <ul style="list-style-type: none"> <li>1. the outcomes of consultation undertaken with iwi, hapu or marae that has an association to the site or area;</li> <li>2. whether a <del>cultural</del> <b>tangata whenua</b> impact assessment has been undertaken by a suitably qualified person who is <del>acknowledged/</del>endorsed by the iwi, hapu or relevant marae, and any recommended conditions and/or monitoring to</li> </ul>

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						<p>achieve desired outcomes;</p> <ol style="list-style-type: none"> <li>3. any iwi/hapu environmental management plans lodged with Council;</li> <li>4. that tangata whenua are specialists in the tikanga of their hapu or iwi, including when preparing or undertaking a cultural impact assessment; and</li> <li>5. any protection, preservation or enhancement proposed.</li> </ol>
<p><b>Haititaimarangi Marae Kaitiaki Trust (S394)</b></p>	<p>S394.025</p>	<p>Sites and areas of significance to Māori</p>	<p>SASM-P4</p>	<p>Support in part</p>	<p>Haititaimarangi Marae has had a number of experiences where Council has accepted no or very high level consultation as sufficient for the purposes of drawing conclusions on the scale of cultural effects. Haititaimarangi considers greater guidance is needed. It is difficult to see how this approach assists Council in the proper exercise of its functions or to achieve the RMA's purpose. Hapū are specialists in their own tikanga. Any cultural impact assessment should be endorsed accordingly.</p>	<p>Amend Policy SASM-P4 as follows: Consider the following... :</p> <ol style="list-style-type: none"> <li>a. the <b>extent of engagement</b> outcomes of consultation undertaken with iwi, hapū or marae that has an association to the site or area;</li> <li>b. whether a cultural impact assessment has been undertaken by a suitably qualified person who is acknowledged/endorsed by the <del>iwi</del>, hapū or relevant marae, and any recommended conditions and/or monitoring to achieve desired outcomes;</li> <li>c. ...</li> <li>d. that tangata whenua are</li> </ol>

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						specialists in the tikanga of their hapū or iwi, including when preparing or undertaking a cultural impact assessment; <del>and</del> e. any protection, preservation or enhancement proposed; <del>and</del> <b>f. the scale of effects on any cultural values.</b>
<b>Ministry of Education Te Tāhuhu o Te Mātauranga (S331)</b>	S331.041	Sites and areas of significance to Māori	SASM-P8	Support	The submitter supports policy SASM P8 as it manages the effects of land use and development (including educational facilities) on sites and areas of significance to Māori to safeguard the Far North District's cultural landscape.	Retain policy SASM P8, as proposed.
<b>Merata Kawharu Taituha, Renata Tane, Albie Apiata, Billie Taituha and Hirini Tane (S389)</b>	S389.014	Sites and areas of significance to Māori	SASM-P9	Support in part	We recommend that the policy be clarified in these ways so as to promote a closer and more meaningful relationship between tangata whenua and Council as we stated at the outset of this submission. Consent costs should be waived.	Amend policy SASM-P9 as follows: Encourage protection, maintenance and restoration of scheduled sites and areas of significance to Māori, including <del>consideration of</del> <b>applying</b> the following additional measures: <ol style="list-style-type: none"> <li>1. <del>reducing or</del> waiving consent applications costs;</li> <li>2. providing funding, grants and other incentive <b>opportunities</b>; and</li> <li>3. <del>obtaining, recording and sharing</del> <b>Council-held</b> information about sites and areas of significance to Māori.</li> </ol>

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<b>Summit Forests New Zealand Limited (S148)</b>	S148.013	Sites and areas of significance to Māori	Rules	Not Stated	Sites and areas of significance may exist in areas of established plantation forestry. There are well established protocols that cover discovery and or management of sites and areas of significance to Māori that include consultation with local Māori and obtaining the authorities necessary for the removal of any plantation trees and/or wildings on those sites. The Plan needs to provide for the removal of plantation forest trees from sites and areas of significance subject to the provisions of an authority issued by Heritage New Zealand Pouhere Taonga as a permitted activity.	Amend the rules under Sites and areas of significance to Māori to provide for the removal of plantation forest trees from a scheduled site and areas of significance to Māori under an authority issued by Heritage New Zealand Pouhere Taonga as a permitted activity
<b>Horticulture New Zealand (S159)</b>	S159.049	Sites and areas of significance to Māori	Rules	Not Stated	Rule SASM-R3 states that activities not otherwise listed in this chapter are discretionary activities. Rural production activities are not listed as a specific activity so need to be provided for as a permitted activity	Insert a new rule <b>SASM-RXRural production activities Activity status: Permitted All zones and heritage overlays</b>
<b>Heritage New Zealand Pouhere Taonga (S409)</b>	S409.013	Sites and areas of significance to Māori	Rules	Support	The Proposed Plan is required to recognise and provide for the matters of national importance, in particular 6(f) "the protection of historic heritage from inappropriate subdivision, use and development" and s6(e) "the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga." HNZPT considers that the hybrid-plan format of the Proposed Plan, that includes: the identification of historic heritage; heritage area overlays; Kororareka Russell Township Zone and Sites and Areas of Significance to Maori issues (Overview), objectives, policies and rules each within a Section of the plan, is of assistance to the reader in understanding the background and reasons for the rules.	Retain the rules for Sites and Areas of Significance to Maori
<b>Top Energy Limited (S483)</b>	S483.144	Sites and areas of significance to Māori	Rules	Not Stated	Top Energy support the acknowledgement. importance and significance of these sites to tangata whenua/manua whenua. Top Energy acknowledge that the purpose of this	Amend rules to allow the suitable provision of new infrastructure where there is an operational and functional need, and the ongoing operation,

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					Chapter is to protect these sites from inappropriate subdivision and development. However, in some instances there is an operational and functional need for infrastructure to be located within areas identified as being of significance to Māori, particularly given the extent that some of these areas cover.	maintenance, repair and upgrading of infrastructure within sites and areas of significance to Māori
<b>Ministry of Education Te Tāhuhu o Te Mātauranga (S331)</b>	S331.042	Sites and areas of significance to Māori	SASM-R1	Support	The submitter supports rule SASM-R1 New buildings or structures, extensions or alterations to existing buildings or structures, earthworks or indigenous vegetation clearance, as it manages the effects of land use and development (including educational facilities) on sites and areas of significance to Māori to safeguard the Far North District's cultural landscape.	Retain rule SASM-R1 New buildings or structures, extensions or alterations to existing buildings or structures, earthworks or indigenous vegetation clearance, as proposed.
<b>Haitaitamaran gai Marae Kaitiaki Trust (S394)</b>	S394.026	Sites and areas of significance to Māori	SASM-R1	Support in part	Iwi authority do not necessarily represent all hapū that whakapapa to that iwi. The RMA does not mandate and iwi authority to speak on behalf of hapū. Consultation should be at a hapū level, acknowledging some hapū may wish to speak through iwi.	Amend point a of the matters of discretion relating to Rule SASM-R1 as follows: whether the requesting party listed in Schedule 3, the relevant <b>hapū iwi authority</b> , or Heritage New Zealand Pouhere Taonga, have been consulted, the <b>extent and outcome</b> of that consultation, and the extent to which the proposal responds to, or incorporates the outcomes of that consultation...
<b>Northland Planning and Development 2020 Limited (S502)</b>	S502.079	Sites and areas of significance to Māori	SASM-R1	Support in part	Changes have been sought to state that if written approval has been received by the requesting party listed in Schedule 3, then the works are deemed to be a permitted activity. At times minor works such as the trenching of a cable may be required or repair and maintenance activities may need to be undertaken which would trigger a	Amend SASM-R1 PER-1 The activity is undertaken by the requesting party listed in Schedule 3 <b>or by another party where written approval has been received from the requesting party for the works.</b>

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					resource consent. In these cases if the written approval from the requesting authority has been received a consent process should not be necessary. This also relates to items such as fencing which is generally exempt from earthworks provisions but not from the definition of a structure.	
<b>Waitangi Limited (S503)</b>	S503.025	Sites and areas of significance to Māori	SASM-R1	Not Stated	Changes have been sought to state that if written approval has been received by the requesting party listed in Schedule 3, then the works are deemed to be a permitted activity. In this case, Heritage NZ Pouhere Taonga are the requesting authority for MS09-49 which is the Waitangi Treaty Grounds. At times minor works such as the trenching of a cable is required or general repair and maintenance activities on the grounds are needed to be undertaken which would trigger a resource consent. In these cases given the very minor nature of some of these activities if the written approval from Heritage NZ has been received a consent process should not be necessary	Amend PER-1 of Rule SASM-R1 as follows: The activity is undertaken by the requesting party listed in Schedule 3 <b>or by another party where written approval has been received from the requesting party for the works.</b> In the event this relief is not accepted, given the wider implications of this change, we would also be satisfied in having this change apply to the Waitangi Estate specifically.
<b>Top Energy Limited (S483)</b>	S483.191	Sites and areas of significance to Māori	SASM-R3	Support	Top Energy considers that there is a lack of clarity throughout the PDP in terms of how the Chapters interact with each other, and some consistency. The Overlay chapters are one example and are inconsistent with respect to referencing rules for "activities not otherwise listed". The How the Plan Works chapter includes a statement that indicates some overlays will automatically default to a permitted activity, however resource consent may still be required under other Part 2: District-wide Matters chapters and/or Part 3: Area-Specific chapters (including the underlying zone). Some Chapters include notes which provide some clarity in this regard (e.g. Heritage	Amend all relevant overlay chapters as necessary to insert rules for "Activities not otherwise listed in this chapter", consistent with zone chapters.

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					<p>Overlay) however this isn't consistently applied through the overlays or the District Wide Chapters generally.</p> <p>Some overlays include a catch all 'activities not otherwise specified' activity status (e.g. Treaty Settlement Land Overlay). Some overlays don't.</p> <p>This lack of consistency (coupled with inconsistent terminology) will cause confusion for Plan users and ultimately, impact the integrity of the plan. This is particularly relevant in the Overlay chapters where each Overlay chapter has a different approach to activity status default rules.</p> <p>With specific regard to the permitted activity default, it is noted that this could lead unintentional consequences.</p>	
<b>PF Olsen Limited (S91)</b>	S91.004	Sites and areas of significance to Māori	SASM-R5	Oppose	<p>There are well established procedures in place and a significant depth of knowledge in the plantation forest industry with regards to sites and areas of significance to Māori. Protocols include discovery and/or management of sites and areas of significance to Māori that include consultation with local Māori and obtaining Authority from Heritage NZ for the removal of any plantation trees and/or wildings on those sites.</p> <p>There is no provision for non-complying activities under the Natural and Built Environments Bill.</p>	Amend the activity status to Controlled for plantation forestry activities and Permitted if an Authority has been granted by Heritage NZ.
<b>Bentzen Farm Limited (S167)</b>	S167.013	Ecosystems and indigenous biodiversity	Overview	Oppose	<p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas.</p> <p>Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.</p>	Amend the Overview as follows: Council has responsibilities under the RMA, the NZCPS and the RPS to identify and protect areas of significant indigenous biodiversity ( <del>Significant Natural Areas</del> ) and maintain indigenous biodiversity. Where <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant</b>



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						<p><b>habitats of indigenous fauna</b> are identified in the District Plan or through ecological assessments in accordance with the significance criteria in Appendix 5 of the RPS or any more recent National Policy Statement on indigenous biodiversity there <del>will be greater control over land use and subdivision</del> <b>conditions may be placed on consents</b> to ensure that the ecological significance of these areas are protected. There may be tension between the public and ecological benefits in protecting, maintaining or enhancing indigenous biodiversity and the associated costs or restrictions to private and public (including Māori) landowners.</p>
<p><b>Setar Thirty Six Limited (S168)</b></p>	<p>S168.020</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>Overview</p>	<p>Oppose</p>	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <ol style="list-style-type: none"> <li>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</li> <li>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</li> </ol> <p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude</p>	<p>Amend the Overview as follows: Council has responsibilities under the RMA, the NZCPS and the RPS to identify and protect areas of significant indigenous biodiversity <del>(Significant Natural Areas)</del> and maintain indigenous biodiversity. Where <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> are identified in the District Plan or</p>

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					<p>that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas. Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.</p>	<p>through ecological assessments in accordance with the significance criteria in Appendix 5 of the RPS or any more recent National Policy Statement on indigenous biodiversity there <del>will be greater control over land use and subdivision</del> <b>conditions may be placed on consents</b> to ensure that the ecological significance of these areas are protected. There may be tension between the public and ecological benefits in protecting, maintaining or enhancing indigenous biodiversity and the associated costs or restrictions to private and public (including Māori) landowners</p>
<p><b>The Shooting Box Limited (S187)</b></p>	<p>S187.013</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>Overview</p>	<p>Oppose</p>	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <ol style="list-style-type: none"> <li>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</li> <li>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</li> </ol> <p>Without the SNA areas being mapped, the</p>	<p>Amend the Overview as follows: Council has responsibilities under the RMA, the NZCPS and the RPS to identify and protect areas of significant indigenous biodiversity <del>(Significant Natural Areas)</del> and maintain indigenous biodiversity. Where <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> are identified in the District Plan or through ecological assessments in accordance with the significance</p>

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					<p>section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas.</p> <p>Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.</p>	<p>criteria in Appendix 5 of the RPS or any more recent National Policy Statement on indigenous biodiversity there <del>will be greater control over land use and subdivision</del> <b>conditions may be placed on consents</b> to ensure that the ecological significance of these areas are protected. There may be tension between the public and ecological benefits in protecting, maintaining or enhancing indigenous biodiversity and the associated costs or restrictions to private and public (including Māori) landowners.</p>
<p><b>Wendover Two Limited (S222)</b></p>	<p>S222.020</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>Overview</p>	<p>Support in part</p>	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <ol style="list-style-type: none"> <li>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</li> <li>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</li> </ol> <p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas. Without mapping the SNAs, the associated</p>	<p>Amend the Overview as follows: Council has responsibilities under the RMA, the NZCPS and the RPS to identify and protect areas of significant indigenous biodiversity (<del>Significant Natural Areas</del>) and maintain indigenous biodiversity. Where <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> are identified <del>in the District Plan or</del> through ecological assessments in accordance with the significance criteria in Appendix 5 of the RPS or any more recent National</p>

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					rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.	Policy Statement on indigenous biodiversity there <del>will be greater control over land use and subdivision</del> <b>conditions may be placed on consents</b> to ensure that the ecological significance of these areas are protected. There may be tension between the public and ecological benefits in protecting, maintaining or enhancing indigenous biodiversity and the associated costs or restrictions to private and public (including Māori) landowners.
<b>Matauri Trustee Limited (S243)</b>	S243.022	Ecosystems and indigenous biodiversity	Overview	Oppose	Amendments to the overview section, and the objectives, policies and rules are sought to: 1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and 2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process. Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas. Without mapping the SNAs, the associated rules lack precision, and in relying on case-	Amend the Overview as follows: Council has responsibilities under the RMA, the NZCPS and the RPS to identify and protect areas of significant indigenous biodiversity ( <del>Significant Natural Areas</del> ) and maintain indigenous biodiversity. <del>Where Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> are identified <del>in the District Plan or</del> through ecological assessments in accordance with the significance criteria in Appendix 5 of the RPS or any more recent National Policy Statement on indigenous

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					by-case assessment by landowners as proposed, risk not being consistently applied.	biodiversity there <del>will be greater control over land use and subdivision conditions may be placed on consents</del> to ensure that the ecological significance of these areas are protected. There may be tension between the public and ecological benefits in protecting, maintaining or enhancing indigenous biodiversity and the associated costs or restrictions to private and public (including Māori) landowners
<b>P S Yates Family Trust (S333)</b>	S333.013	Ecosystems and indigenous biodiversity	Overview	Support in part	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <ol style="list-style-type: none"> <li>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</li> <li>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</li> </ol> <p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas. Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.</p>	<p>Amend the Overview as follows: Council has responsibilities under the RMA, the NZCPS and the RPS to identify and protect areas of significant indigenous biodiversity <del>(Significant Natural Areas)</del> and maintain indigenous biodiversity. Where <del>Significant Natural Areas</del> areas of significant indigenous vegetation and significant habitats of indigenous fauna are identified <del>in the District Plan</del> or through ecological assessments in accordance with the significance criteria in Appendix 5 of the RPS or any more recent National Policy Statement on indigenous biodiversity there <del>will be greater control over land use and</del></p>

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						subdivision conditions may be placed on consents to ensure that the ecological significance of these areas are protected. There may be tension between the public and ecological benefits in protecting, maintaining or enhancing indigenous biodiversity and the associated costs or restrictions to private and public (including Māori) landowners
<b>Wakaiti Dalton (S355)</b>	S355.018	Ecosystems and indigenous biodiversity	Overview	Support in part	We are concerned that the overview section of the Ecosystems and Indigenous Biodiversity Chapter (EIB Chapter) does not contain or reflect the role of tangata whenua as kaitiaki over existing forests/bush that exist on their whenua. As detailed in the overview, there are large tracts of indigenous vegetation that exist of whenua Māori or land owned by Māori that are being managed and protected in accordance with Māori cultural values such as manaakitanga that is in line with tikanga and mātauranga Māori whereby tangata are exercising their role as kaitiaki. We are concerned that FNDC are proceeding with provisions that relate and reference Significant Natural Area's without undertaking the necessary engagement with tangata whenua. This is in direct conflict with the directions outlined in the exposure draft for the Natural and Built Environment Act and draft National Policy Statement for Indigenous Biodiversity (NPSIB).	Amend the overview to recognise and provide for tangata whenua as kaitiaki, acknowledging that tikanga and mātauranga Māori play a central role in how tangata whenua manage this resource.
<b>Matauri X Incorporation (S396)</b>	S396.021	Ecosystems and	Overview	Oppose	Matauri X do not believe that the provisions of the aforementioned Chapter appropriately meet section 6(e) of the RMA 1991. The	delete overview

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
		indigenous biodiversity			approach also does not promote kaitiakitanga and the entire chapter is rejected.	
<b>Kapiro Conservation Trust (S442)</b>	S442.018	Ecosystems and indigenous biodiversity	Overview	Support in part	RMA s74((1) states that: 'A territorial authority must prepare and change its district plan in accordance with ... a national policy statement'.  District councils manage the margins of water bodies and the activities that can occur in these areas. Several parts of the National Policy Statement for Freshwater Management 2020 (NPS-FM) give national direction to district councils specifically.	Amend PDP to give effect to the NPS Freshwater Management 2020 in all relevant parts of the DP, including the Ecosystems and Biodiversity, and Natural Character Chapters.
<b>Tracy and Kenneth Dalton (S479)</b>	S479.012	Ecosystems and indigenous biodiversity	Overview	Support	The overview section of the Ecosystems and Indigenous Biodiversity Chapter (EIB Chapter) does not contain or reflect the role of tangata whenua as kaitiaki over existing forests/bush that exist on their whenua. As detailed in the overview, there are large tracts of indigenous vegetation that exist of whenua Māori or land owned by Māori that are being managed and protected in accordance with Māori cultural values such as manaakitanga that is in line with tikanga and mātauranga Māori whereby tangata are exercising their role as kaitiaki. TKD are concerned that FNDC are proceeding with provisions that relate and reference Significant Natural Area's without undertaking the necessary engagement with tangata whenua. This is in direct conflict with the directions outlined in the exposure draft for the Natural and Built Environment Act and draft National Policy Statement for Indigenous Biodiversity (NPSIB).	Amend the overview to insert that FNDC undertake direct engagement with tangata whenua to better understand the role of tangata whenua as kaitiaki, particularly how this is variable across whanau, hapū and iwi and amend the overview to recognise and provide for tangata whenua as kaitiaki, acknowledging that tikanga and mātauranga Māori play a central role in how tangatawhenua manage this resource.
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.060	Ecosystems and indigenous biodiversity	Objectives	Support	not stated	Retain IB-O1-IB-O5 as notified
<b>Director-General of</b>	S364.008	Ecosystems and	Objectives	Not Stated	With the advent of myrtle rust, all Kunzea and Leptospermum taxa are currently	Amend objectives, policies and rules as appropriate to recognise and

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Conservation (Department of Conservation ) (S364)		indigenous biodiversity			considered threatened. The taxonomy and current threatened status of manuka and kanuka should be reflected and managed appropriately through objectives, policies and rules in the proposed plan. The relief sought is to be confirmed during the subsequent District Plan review stages once the 2022 version of the "Conservation status of New Zealand indigenous vascular plants" is available.	implement measures to address and manage the increased threat status of myrtle rust for manuka and kanuka
Matauri X Incorporation (S396)	S396.022	Ecosystems and indigenous biodiversity	Objectives	Oppose	Matauri X do not believe that the provisions of the aforementioned Chapter appropriately meet section 6(e) of the RMA 1991. The approach also does not promote kaitiakitanga and the entire chapter is rejected.	delete objectives
Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)	S425.023	Ecosystems and indigenous biodiversity	Objectives	Oppose	Council have not mapped 'significant natural areas' (SNA) but have included reference to SNA in rules. PHTTCCT consider the absence of mapping SNA will result in implementation confusion and unnecessary cost to PHTTCCT in order to determine compliance.	amend IB to: - Remove reference to significant natural areas in rules and rely on indigenous vegetation clearance thresholds.
Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)	S425.026	Ecosystems and indigenous biodiversity	Objectives	Not Stated	Furthermore, the provisions do not adequately provide for the maintenance, operation and upgrade of regionally significant infrastructure in accordance with the RPS.	amend provisions to ensure that maintenance, operation and upgrade of regionally significant infrastructure is provided for
Kapiro Conservation Trust (S442)	S442.074	Ecosystems and indigenous biodiversity	Objectives	Support	Consider New Objectives to encourage landowners to protect, and enhance biodiversity.	Insert as new objective: " <b>Landowners are encouraged and supported to protect and enhance the biodiversity values of their land</b> ".
Kapiro Conservation Trust (S442)	S442.075	Ecosystems and indigenous biodiversity	Objectives	Support	Ecosystem services are little acknowledged in this plan, yet they form a critical part of the environment.	Insert as new objective: " <b>The ecosystem services provided by areas of indigenous biodiversity</b>



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<b>are recognized and enhanced. These services include increased resilience to the effects of climate change".</b>
<b>Kapiro Conservation Trust (S442)</b>	S442.172	Ecosystems and indigenous biodiversity	Objectives	Support	Need to recognise the importance of encouraging landowners, occupiers and kaitiaki/guardians such as volunteer community groups to protect and enhance biodiversity. To date my experience is that FNDC has not performed well in supporting and encouraging conservation initiatives	Insert new objective: <b>Landowners, land occupiers, and kaitiaki/guardians are encouraged and supported to protect and enhance the biodiversity values of the land they have an interest in.</b>
<b>Kapiro Conservation Trust (S442)</b>	S442.173	Ecosystems and indigenous biodiversity	Objectives	Support	Ecosystem services are little acknowledged in this plan, yet they are essential to maintaining the life supporting capacity of the earth and mitigating the effects of climate change.	Insert new objective <b>The ecosystem services provided by areas of indigenous biodiversity are recognized and enhanced. These services include increased resilience to the effects of climate change, maintaining fresh water quality, and enabling resilient food production systems.</b>
<b>Top Energy Limited (S483)</b>	S483.145	Ecosystems and indigenous biodiversity	Objectives	Not Stated	Top Energy acknowledges that objectives and policies for infrastructure within SNAs are located within the Infrastructure Chapter but seek to ensure that appropriate provision for operation, repair, maintenance and upgrade of electricity infrastructure (in particular) is made in the objectives and policies of this Chapter in alignment with method 4.6.3, Policies 5.1.2 and 5.1.3 given that it also relates to indigenous vegetation clearance not captured as significant	Insert additional objectives that recognise the need for the location of new infrastructure within areas containing indigenous biodiversity where there is an operational and functional need, and any adverse effects are adequately managed. Insert additional objective that provides for the operation, maintenance repair and upgrading of

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						infrastructure within areas of indigenous biodiversity.
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.055	Ecosystems and indigenous biodiversity	Objectives	Support	Consider New Objectives to encourage landowners to protect, and enhance biodiversity	Insert <b>Landowners are encouraged and supported to protect and enhance the biodiversity values of their land.</b>
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.056	Ecosystems and indigenous biodiversity	Objectives	Support	Ecosystem services are little acknowledged in this plan, yet they form a critical part of the environment	Insert <b>The ecosystem services provided by areas of indigenous biodiversity are recognized and enhanced. These services include increased resilience to the effects of climate change.</b>
<b>Carbon Neutral NZ Trust (S529)</b>	S529.115	Ecosystems and indigenous biodiversity	Objectives	Support	The PDP provisions do not provide the level of protection noted in the RMA, Te Mana o te Taiao, anticipated NPS for indigenous biodiversity, Regional Policy Statement, Environment Court decision	Amend objectives to reflect the level for protection noted in the RMA, Te Mana o te Taiao, anticipated NPS for indigenous biodiversity, Regional Policy Statement, Environment Court decision
<b>Carbon Neutral NZ Trust (S529)</b>	S529.131	Ecosystems and indigenous biodiversity	Objectives	Not Stated	A large number of indigenous species are currently classed as threatened or at risk under the national NZ Threat Classification System. <sup>4</sup> About 50 indigenous bird species have become extinct in Aotearoa New Zealand as a result of human activities. <sup>5</sup> Many technical and policy reports have noted that concerted action is required to prevent further deterioration. As noted above, RMA s31(1) applies to decision-making in relation to the use and development of land - District Council functions include 'the control of any actual or potential effects of the use, development, or protection of land, including for the purpose	Amend the objectives to address RPS s4.4 regarding 'Maintaining and enhancing indigenous ecosystems and species' and 'indigenous taxa that are listed as threatened or at risk'.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					of ... (iii) the maintenance of indigenous biological diversity'. The Regional Policy Statement for Northland and Regional Plan contain a number of provisions that refer to aspects of biodiversity that are not about mapped SNAs (Box 1, below, provides examples). As noted above, under s75 of the RMA, the DP is required to give effect to the Regional Policy Statement, and must avoid inconsistency with the Regional Plan. The DP can be more stringent than the RPS, but cannot be more relaxed	
<b>Marianna Fenn (S542)</b>	S542.002	Ecosystems and indigenous biodiversity	Objectives	Support	Need to recognise the importance of encouraging landowners, occupiers and kaitiaki/guardians such as volunteer community groups to protect and enhance biodiversity To date my experience is that FNDC has not performed well in supporting and encouraging conservation initiatives	Insert new objective <b>Landowners, land occupiers, and kaitiaki/guardians are encouraged and supported to protect and enhance the biodiversity values of the land they have an interest in.</b>
<b>Marianna Fenn (S542)</b>	S542.003	Ecosystems and indigenous biodiversity	Objectives	Support	Ecosystem services are little acknowledged in this plan, yet they are essential to maintaining the life supporting capacity of the earth and mitigating the effects of climate change	Insert new objective <b>The ecosystem services provided by areas of indigenous biodiversity are recognized and enhanced. These services include increased resilience to the effects of climate change, maintaining fresh water quality, and enabling resilient food production systems.</b>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Martin John Yuretich (S40)</b>	S40.003	Ecosystems and indigenous biodiversity	IB-O1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	Amend the PDP to reflect the submission as follows: <ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Modify the approach to work in partnership with landowners (given that the Council is required to undertake mapping and identification of SNAs under the NPS-IB)</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• Include the option of a simple bush protection covenant by consent notice if owners wish to protect their bush, not just Reserves Act and QEII covenants</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<b>Joel Vieviorka (S41)</b>	S41.003	Ecosystems and indigenous biodiversity	IB-O1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting	Amend the PDP to reflect the submission as follows: <ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<ul style="list-style-type: none"> <li>• Modify the approach to work in partnership with landowners (given that the Council is required to undertake mapping and identification of SNAs under the NPS-IB)</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• Include the option of a simple bush protection covenant by consent notice if owners wish to protect their bush, not just Reserves Act and QEII covenants</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<p><b>Andrea Vicki Thomas (S43)</b></p>	<p>S43.002</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-O1</p>	<p>Oppose</p>	<p>Submitter opposes the added expense to landowners to now engage a ecologist to prove that the bush on their property to establish that indigenous vegetation is not an SNA. Any help by Council will be at the rate payers expense having already footed the bill for the original SNA mapping. There has been an increase of 30% from when the district was last mapped for a similar purpose in the 1990` s. This tells us that over 30 years our bush and forest has increased not decreased. Our land owners of the Far North have actually taken it upon themselves to increase these areas. They have fenced and restored wetlands, waterways and bush areas. What you are doing is creating a disincentive for landowners to do this work, not an incentive.</p>	<p>Amend to include mapping and identification of SNA's.</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Paul O'Connor (S49)</b>	S49.002	Ecosystems and indigenous biodiversity	IB-O1	Oppose	Removal of SNA maps from the PDP is unnecessary and puts the onus on landowners to prove bush on their property is not an SNA. This necessitates engaging and ecologist at their expense. It is not fair to assume all bush is under SNA unless proven otherwise.	Amend to assist land owners with the SNA identification process - thus encouraging them to protect SNA areas.
<b>Strand Homes Ltd/Okahu Developments Ltd (S77)</b>	S77.002	Ecosystems and indigenous biodiversity	IB-O1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	Amend to: <ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Trevor John Ashford (S146)</b>	S146.003	Ecosystems and indigenous biodiversity	IB-01	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	Amend to: <ul style="list-style-type: none"> <li>Acknowledgethat ratepayers have managed to enhance the SNAs in the District, instead offorcing them to do this, facilitate and assist them in what they are alreadydoing</li> <li>Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership withlandowners</li> <li>Provideincentives (support and resources), not disincentives, for landowners toenhance the natural biodiversity of their land</li> <li>Ifowners wish to protect their bush, the option of a simple bush protectioncovenant by consent notice should be available, not just Reserves Act and QEIIcovenants.</li> <li>MakeSNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<b>Manulife Forest Management (NZ) Ltd (S160)</b>	S160.014	Ecosystems and indigenous biodiversity	IB-01	Support	The submitter supports objective IB-01 and considers that it is important that SNAs are identified to provide certainty to landowners.	Retain objective IB-01 as it is written.
<b>Shanon Garton (S161)</b>	S161.002	Ecosystems and indigenous biodiversity	IB-01	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with	Amend to: <ul style="list-style-type: none"> <li>Acknowledge that ratepayers have managed to enhance</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<p>the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</p> <ul style="list-style-type: none"> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<p><b>Julianne Sally Bainbridge (S163)</b></p>	<p>S163.006</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-O1</p>	<p>Oppose</p>	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's</p>	<p>Amend the Plan:</p> <ul style="list-style-type: none"> <li>• to acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• to modify the approach to work in partnership with landowners</li> <li>• to provide incentives (support and resources), not</li> </ul>



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	<p>disincentives, for landowners to enhance the natural biodiversity of their land</p> <ul style="list-style-type: none"> <li>to provide the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants</li> <li>to make SNA mapping available publicly, even if it is not part of the PDP</li> </ul>
<b>Bentzen Farm Limited (S167)</b>	S167.014	Ecosystems and indigenous biodiversity	IB-O1	Oppose	Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas. Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.	Amend Objective IB-O1 as follows: Areas of significant indigenous vegetation and significant habitats of indigenous fauna ( <del>Significant Natural Areas</del> ) are identified and protected for current and future generations
<b>Setar Thirty Six Limited (S168)</b>	S168.021	Ecosystems and indigenous biodiversity	IB-O1	Oppose	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <ol style="list-style-type: none"> <li>Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</li> <li>Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</li> </ol> <p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas. Without mapping the SNAs, the associated rules lack precision, and in relying on case-</p>	Amend Objective IB-O1 as follows: Areas of significant indigenous vegetation and significant habitats of indigenous fauna ( <del>Significant Natural Areas</del> ) are identified and protected for current and future generations

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					by-case assessment by landowners as proposed, risk not being consistently applied.	
<b>The Shooting Box Limited (S187)</b>	S187.014	Ecosystems and indigenous biodiversity	IB-O1	Oppose	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <ol style="list-style-type: none"> <li>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</li> <li>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</li> </ol> <p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas.</p> <p>Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.</p>	Amend Objective IB-O1 as follows: Areas of significant indigenous vegetation and significant habitats of indigenous fauna ( <del>Significant Natural Areas</del> ) are identified and protected for current and future generations.
<b>Wendover Two Limited (S222)</b>	S222.021	Ecosystems and indigenous biodiversity	IB-O1	Support in part	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <ol style="list-style-type: none"> <li>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</li> <li>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</li> </ol> <p>Without the SNA areas being mapped, the</p>	Amend Objective IB-O1 as follows: Areas of significant indigenous vegetation and significant habitats of indigenous fauna ( <del>Significant Natural Areas</del> ) are identified and protected for current and future generations

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas. Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.	
<b>Matauri Trustee Limited (S243)</b>	S243.023	Ecosystems and indigenous biodiversity	IB-O1	Oppose	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <ol style="list-style-type: none"> <li>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</li> <li>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</li> </ol> <p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas. Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.</p>	Amend Objective IB-O1 as follows: Areas of significant indigenous vegetation and significant habitats of indigenous fauna ( <del>Significant Natural Areas</del> ) are identified and protected for current and future generations
<b>P S Yates Family Trust (S333)</b>	S333.014	Ecosystems and indigenous biodiversity	IB-O1	Support in part	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <ol style="list-style-type: none"> <li>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</li> <li>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</li> </ol> <p>Without the SNA areas being mapped, the</p>	Amend Objective IB-O1 as follows: Areas of significant indigenous vegetation and significant habitats of indigenous fauna ( <del>Significant Natural Areas</del> ) are identified and protected for current and future generations

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas. Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.</p>	
<p><b>Sapphire Surveyors Limited (S348)</b></p>	<p>S348.005</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-O1</p>	<p>Oppose</p>	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<p>Amend the PDP to reflect the submission as follows:</p> <ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Modify the approach to work in partnership with landowners (given that the Council is required to undertake mapping and identification of SNAs under the NPS-IB)</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• Include the option of a simple bush protection covenant by consent notice if owners wish to protect their bush, not just Reserves Act and QEII covenants</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>

SUMMARY OF SUBMISSIONS

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Sean Frieling (S357)	S357.032	Ecosystems and indigenous biodiversity	IB-O1	Oppose	<p>Despite clear opposition to SNA mapping, provisions in the PDP have retained the essence of the SNA mapping, but with the added expense to landowners to have to engage an ecologist to prove that the bush on their property is not an SNA. None of the methods in policy IB-P6 have been given effect under the PDP.</p> <p>Overall rural landowners have of their own volition increased not decreased the areas of SNA. Council is now creating rules in relation to these areas that create a disincentive for landowners to restore wetlands, waterways and bush areas.</p> <p>Support the development bonus provisions for allow for smaller lot sizes in the rural production zone for any subdivision that provides protection of indigenous vegetation.</p>	<p>Acknowledge that ratepayers have managed to enhance the SNA in the District, facilitate and assist them in what they are already doing.</p> <p>Modify the approach to mapping and identification of SNA in accordance with the draft NPS for indigenous biodiversity.</p> <p>Insert incentives, not disincentives for landowners to enhance the natural biodiversity of their land.</p> <p>Amend the options for bush protection.</p> <p>Make SNA mapping available to the public.</p>
Director-General of Conservation (Department of Conservation ) (S364)	S364.031	Ecosystems and indigenous biodiversity	IB-O1	Support in part	<p>The Director-General supports Objective IB-O1, however requests an amendment to the wording to promote the enhancement of Significant Natural Areas.</p>	<p>Amend Objective IB-O1 as follows: Areas of significant indigenous vegetation and significant habitats of indigenous fauna (Significant Natural Areas) are identified <del>and</del>, protected, <b>and enhanced</b> for current and future generations.</p>
Rua Hatu Trust (S377)	S377.003	Ecosystems and indigenous biodiversity	IB-O1	Oppose	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA.</p> <p>Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for</p>	<p>Amend to:</p> <ul style="list-style-type: none"> <li>Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<p>to work in partnership with landowners</p> <ul style="list-style-type: none"> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<p><b>Sean Jozef Vercammen (S395)</b></p>	<p>S395.003</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-O1</p>	<p>Oppose</p>	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<p>Amend to:</p> <ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</p> <ul style="list-style-type: none"> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<b>Kerry-Anne Smith (S410)</b>	S410.003	Ecosystems and indigenous biodiversity	IB-O1	Oppose	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<ul style="list-style-type: none"> <li>• Amend to:</li> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing <ul style="list-style-type: none"> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners <ul style="list-style-type: none"> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land <ul style="list-style-type: none"> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul> </li> </ul> </li> </ul> </li> </ul>
<b>Roger Myles Smith (S411)</b>	S411.003	Ecosystems and indigenous biodiversity	IB-O1	Oppose	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends</p>	<ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<p>mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</p> <ul style="list-style-type: none"> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<p><b>Northland Federated Farmers of New Zealand (S421)</b></p>	<p>S421.133</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-O1</p>	<p>Support</p>	<p>Federated Farmers has a significant interest in this chapter of the proposed district plan. The preservation of indigenous ecosystems and biodiversity has and will continue to create tensions between private landowners, Iwi and Councils.</p> <p>The approach taken to indigenous ecosystems and biodiversity is that landowners should it as a valuable asset rather than a hindrance. As part of this, it is important that activities such as lambing, calving, shelter, water supply and takes, fencing, access and works for access and fire breaks are permitted throughout the plan. Federated Farmers supports the Council removing the previous mapping that was included in the draft plan and the movement toward assessments being made where the permitted activity threshold has not been complied with.</p>	<p>Retain Objective IB-O1 or wording with similar effect</p>



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>John Joseph and Jacqueline Elizabeth Matthews (S439)</b>	S439.003	Ecosystems and indigenous biodiversity	IB-O1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	Amend Objective IB-O1: <ul style="list-style-type: none"> <li>to acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>to work in partnership with landowners given that the council is required to undertake mapping and identification of SNAs under the NPS-IB</li> <li>to provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>to provide the option of a simple bush protection covenant by consent notice if owners wish to protect their bush, not just Reserves Act and QEII covenants</li> <li>to make SNA mapping available publicly, even if it is not part of the PDP</li> </ul>
<b>LJ King Ltd (S464)</b>	S464.003	Ecosystems and indigenous biodiversity	IB-O1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine	<ul style="list-style-type: none"> <li>Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<p>to work in partnership with landowners</p> <ul style="list-style-type: none"> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<p><b>Helmut Friedrich Paul Letz and Angelika Eveline Letz (S470)</b></p>	<p>S470.003</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-O1</p>	<p>Oppose</p>	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>Reserves Act and QEII covenants.</p> <ul style="list-style-type: none"> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<p><b>Michael Foy (S472)</b></p>	<p>S472.040</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-O1</p>	<p>Oppose</p>	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<p><b>Elbury Holdings (S485)</b></p>	<p>S485.042</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-O1</p>	<p>Oppose</p>	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to</p>	<ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<p>them in what they are already doing</p> <ul style="list-style-type: none"> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<p><b>Elbury Holdings (S519)</b></p>	<p>S519.042</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-O1</p>	<p>Oppose</p>	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of</p>	<ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing             <ul style="list-style-type: none"> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice</li> </ul> </li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					the methods in policy IB-P6 have been given effect under the PDP.	should be available, not just Reserves Act and QEII covenants. <ul style="list-style-type: none"> <li>Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<b>Elbury Holdings (S541)</b>	S541.003	Ecosystems and indigenous biodiversity	IB-O1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	<ul style="list-style-type: none"> <li>Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners <ul style="list-style-type: none"> <li>Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul> </li> </ul>
<b>LJ King Limited (S543)</b>	S543.003	Ecosystems and indigenous biodiversity	IB-O1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial	<ul style="list-style-type: none"> <li>Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<p>to work in partnership with landowners</p> <ul style="list-style-type: none"> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<p><b>Kelvin Richard Horsford (S544)</b></p>	<p>S544.003</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-O1</p>	<p>Oppose</p>	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>Reserves Act and QEII covenants.</p> <ul style="list-style-type: none"> <li>• Make SNA mapping available publicly, even if it is not part of the PDP</li> </ul>
<p><b>LJ King Limited (S547)</b></p>	<p>S547.003</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-O1</p>	<p>Oppose</p>	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP</li> </ul>

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<b>Rodney S Gates and Cherie R Gates (S569)</b>	S569.003	Ecosystems and indigenous biodiversity	IB-O1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	<ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<b>Manulife Forest Management (NZ) Ltd (S160)</b>	S160.015	Ecosystems and indigenous biodiversity	IB-O2	Support	The submitter supports objective IB-02 and considers that it is important that indigenous biodiversity is managed to consider social, economic and cultural well-being of people and communities.	Retain objective IB-02 as it is written.
<b>Julianne Sally Bainbridge (S163)</b>	S163.007	Ecosystems and indigenous biodiversity	IB-O2	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush	<p>Amend the Plan:</p> <ul style="list-style-type: none"> <li>• to acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and</li> </ul>



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					<p>on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<p>assist them in what they are already doing</p> <ul style="list-style-type: none"> <li>• to modify the approach to work in partnership with landowners</li> <li>• to provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• to provide the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants</li> <li>• to make SNA mapping available publicly, even if it is not part of the PDP</li> </ul>
<p><b>Heather Golley (S254)</b></p>	<p>S254.003</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-O2</p>	<p>Oppose</p>	<p>Opposes objectives, sections, policies, rules, regulations, practice notes, and supporting documentation which relates to wellbeing, dog owners, dogs, the banning of dogs and cats (via resource consent conditions, covenants or consent notices), the impact of dogs on the environment, kennels, sub-divisions, dogs and their relationship with native flora and fauna, significant natural areas, zoning which limits dog ownership, and dog limits placed on Significant Natural Areas (SNAs). There is no identification of SNA's or the "Kiwi" areas referred to in the provisions, that also makes it impossible to properly understand and assess the impact of the DP on individuals and or the district. Our dogs are our family members, best friends, counsellors, workmates, pig hunters, and brilliant farmhands. Cats are family to many people, especially the elderly. Submitter does not accept that FNDC has a</p>	<p>Amend the provisions of the District Plan so they do not limit dog ownership or result in the banning of dogs and cats (via resource consent conditions, covenants or consent notices) (inferred). Make critical supporting documents, and all other undisclosed relevant information publicly available now, including Draft SNA maps, The 'Practice Note for Significant Indigenous Flora and Fauna', and the 'Bay of Islands Kiwi Distribution Map - Support Document'.</p>

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					<p>right to ban and restrict her family from owning pets responsibly, anywhere in Northland. FNDC needs to consider the unintended consequences of their actions including but not limited to:</p> <ul style="list-style-type: none"> <li>- humanitarian and mental health crises with people having to relinquish pets</li> <li>- animal rescue services and pounds being overwhelmed with dogs and cats, financially stressed</li> <li>- fewer children living in homes which have dogs and cats, which means they will increase their risk of harm from dogs because they will not learn how to care for, respect, and control their dogs.</li> <li>- less positive view of our district as a retirement area.</li> </ul>	
<b>The BOI Watchdogs (S354)</b>	S354.019	Ecosystems and indigenous biodiversity	IB-O2	Oppose	Controls should not be placed on the ownership of dogs until BOI Watchdog concerns have been addressed in order to determine if they are appropriate. Refer to full submission.	Delete this objective.
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.032	Ecosystems and indigenous biodiversity	IB-O2	Support in part	The Director-General supports the intention of Objective IB-O2, however, considers the wording could be amended to better align with the NPSIB exposure draft.	Amend the wording of Objective IB-O2 as follows: Indigenous biodiversity is <del>managed to maintain its extent and diversity</del> <b>protected, maintained, and restored</b> in a way that provides for the social, economic and cultural well-being of people and communities.
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.134	Ecosystems and indigenous biodiversity	IB-O2	Support	Federated Farmers has a significant interest in this chapter of the proposed district plan. The preservation of indigenous ecosystems and biodiversity has and will continue to create tensions between private landowners, Iwi and Councils. The approach taken to indigenous ecosystems and biodiversity is that	Retain Objective IB-O2 or wording with similar effect

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					landowners should it as a valuable asset rather than a hindrance. As part of this, it is important that activities such as lambing, calving, shelter, water supply and takes, fencing, access and works for access and fire breaks are permitted throughout the plan. Federated Farmers supports the Council removing the previous mapping that was included in the draft plan and the movement toward assessments being made where the permitted activity threshold has not been complied with.	
<b>Kapiro Conservation Trust (S442)</b>	S442.073	Ecosystems and indigenous biodiversity	IB-O2	Oppose	Fails to give effect to the environmental bottom lines approach required under the RMA. Human centric and use orientated. There will be threatened indigenous biodiversity which occurs outside areas identified as SNAs.	Amend IB-O2 <b>The extent and diversity of Indigenous biodiversity across the district is managed to maintained its extent and diversity in a way that provides for the social, economic and cultural well-being of people and communities.</b>
<b>Kapiro Conservation Trust (S442)</b>	S442.171	Ecosystems and indigenous biodiversity	IB-O2	Oppose	To use orientated and fails to give effect to the environmental bottom lines required by the RMA. Maintaining, protecting and enhancing natural assets will provide multiple benefits, including climate change mitigation, ecosystem services such as cleaner water and more reliable water supply, tourism attractions, and improvements in wellbeing for residents.	Amend by replacing with <b>Indigenous biodiversity is managed to maintain its extent and diversity in a way that provides for the social, economic and cultural well-being of people and communities. The extent and diversity of indigenous biodiversity across the district is maintained, protected, and where possible enhanced</b>
<b>Waiaua Bay Farm Limited (S463)</b>	S463.027	Ecosystems and	IB-O2	Oppose	WBF supports the apparent intent of this objective. However, the statement regarding management to maintain extent and diversity	Amend Objective IB-O2 as follows: Indigenous biodiversity is managed to <b>ensure no net loss of maintain its</b>

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		indigenous biodiversity			is unclear and may be interpreted as a "hard" environmental bottom line that could inappropriately constrain ecological restoration or regeneration projects. WBF suggests a reference to "no net loss" of diversity and extent may be a more appropriate way to clarify the objective and ensure that maintenance of extent is not treated as a requirement to avoid all adverse effects.	extent and diversity, <b>and</b> in a way that provides for the social, economic and cultural well-being of people and communities.
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.054	Ecosystems and indigenous biodiversity	IB-O2	Oppose	Fails to give effect to the environmental bottom lines approach required under the RMA. Human centric and use orientated. There will be threatened indigenous biodiversity which occurs outside areas identified as SNAs	Amend IB-O2 <b>The extent and diversity of Indigenous biodiversity across the district is managed to maintained its extent and diversity in a way that provides for the social, economic and cultural well-being of people and communities.</b>
<b>Marianna Fenn (S542)</b>	S542.001	Ecosystems and indigenous biodiversity	IB-O2	Oppose	To use orientated and fails to give effect to the environmental bottom lines required by the RMA. Maintaining, protecting and enhancing natural assets will provide multiple benefits, including climate change mitigation, ecosystem services such as cleaner water and more reliable water supply, tourism attractions, and improvements in wellbeing for residents.	Amend by replacing with <del>Indigenous biodiversity is managed to maintain its extent and diversity in a way that provides for the social, economic and cultural well-being of people and communities.</del> <b>The extent and diversity of indigenous biodiversity across the district is maintained, protected, and where possible enhanced</b>
<b>Scrumptious Fruit Trust (S568)</b>	S568.001	Ecosystems and	IB-O2	Support in part	the well being of communities is a consequence of that primary objective	amend IB-O2 should read that indigenous biodiversity is managed to maintain its extent and diversity in a

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		indigenous biodiversity				way that provides for itself primarily to be preserved and flourish.
<b>Haititaimaran gai Marae Kaitiaki Trust (S394)</b>	S394.027	Ecosystems and indigenous biodiversity	IB-O3	Support	This provision neatly captures the interrelationship between ss 6(c) and 6(e) RMA.	Retain Objective IB-O3
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.135	Ecosystems and indigenous biodiversity	IB-O3	Support	Federated Farmers has a significant interest in this chapter of the proposed district plan. The preservation of indigenous ecosystems and biodiversity has and will continue to create tensions between private landowners, Iwi and Councils. The approach taken to indigenous ecosystems and biodiversity is that landowners should it as a valuable asset rather than a hindrance. As part of this, it is important that activities such as lambing, calving, shelter, water supply and takes, fencing, access and works for access and fire breaks are permitted throughout the plan. Federated Farmers supports the Council removing the previous mapping that was included in the draft plan and the movement toward assessments being made where the permitted activity threshold has not been complied with.	Retain Objective IB-O3 or wording with similar effect
<b>Nicole Wooster (S259)</b>	S259.003	Ecosystems and indigenous biodiversity	IB-O4	Support in part	Landowners also take on a steward role especially with intergenerational properties and the policy framework should recognise this. Our farm has been in family ownership for 4 generations and the intention is for it to stay in family ownership. The land is not just a financial asset it is our home and a place for the wider family to stay connected to. Due to this stewardship of the land has not been as extensively farmed, unlike neighbouring land, and has areas of regenerating vegetation.	Insert recognition that landowners are also stewards of the land, not just tangata whenua.
<b>Northland Federated Farmers of</b>	S421.136	Ecosystems and	IB-O4	Support	Federated Farmers has a significant interest in this chapter of the proposed district plan. The preservation of indigenous ecosystems	Retain Objective IB-O4 or wording with similar effect

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<b>New Zealand (S421)</b>		indigenous biodiversity			and biodiversity has and will continue to create tensions between private landowners, Iwi and Councils. The approach taken to indigenous ecosystems and biodiversity is that landowners should treat it as a valuable asset rather than a hindrance. As part of this, it is important that activities such as lambing, calving, shelter, water supply and takes, fencing, access and works for access and fire breaks are permitted throughout the plan. Federated Farmers supports the Council removing the previous mapping that was included in the draft plan and the movement toward assessments being made where the permitted activity threshold has not been complied with.	
<b>Director-General of Conservation (Department of Conservation) (S364)</b>	S364.033	Ecosystems and indigenous biodiversity	IB-O5	Support	The Director-General supports Objective IB-O5	Retain Objective IB-O5
<b>Waiaua Bay Farm Limited (S463)</b>	S463.028	Ecosystems and indigenous biodiversity	IB-O5	Support	WBF supports this objective (inferred).	Retain Objective IB-O5
<b>Lynley Newport (S128)</b>	S128.003	Ecosystems and indigenous biodiversity	Policies	Support in part	Comment: Part e 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	Amend policy/ies to 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.

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					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-PI. There is no doubt or argument that habitat of ecological significance needs to be identified and protected, it is the methodology that is in question. Is the cost going to fall entirely on a landowner? 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?	
<b>Russell Landcare Trust (S276)</b>	S276.004	Ecosystems and indigenous biodiversity	Policies	Support in part	Protection and recognition of indigenous biodiversity is inadequate and the rules do not prevent incremental loss.	Delete policies IB-P1, IB-P2 and IB-P3 and replace these with Policy 4.4.1 of the Regional Policy Statement.
<b>Russell Landcare Trust (S276)</b>	S276.005	Ecosystems and indigenous biodiversity	Policies	Support in part	Protection and recognition of indigenous biodiversity is inadequate and the rules do not prevent incremental loss.	Insert a policy that recognises that not all significant natural areas will be mapped and that unmapped areas are to have, as far as practicable, the same level of protection in the proposed Plan as mapped Significant Natural Areas. Insert Operative Plan policies 12.2.4.1, 12.2.4.3, 12.2.4.5, 12.2.4.10, 12.2.4.11, 12.2.4.12, 12.2.4.13 and 12.2.4.14 to the policy section of the Ecosystems and Indigenous Biodiversity chapter.
<b>Te Aupōuri Commercial Development Ltd (S339)</b>	S339.026	Ecosystems and indigenous biodiversity	Policies	Not Stated	Subject to the relief sought in submission point 14 of submission lodged, TACDL consider new policies are needed to provide for these changes. However, it is considered that the requirement for these areas to be incorporated into a district plan schedule as	Insert a new policy as follows: <b>Encourage the protection of areas of significant indigenous biodiversity and habitats at the time of subdivision and</b>

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					being inappropriate as this would require a Schedule 1 Plan change process to be undertaken.	<b>development.</b>
<b>Te Aupōuri Commercial Development Ltd (S339)</b>	S339.027	Ecosystems and indigenous biodiversity	Policies	Not Stated	TACDL is supportive of FNDC's intention to provide assistance to landowners to protect and manage important indigenous vegetation and habitats, particularly to Māori as they are heavily burdened with the management of these resources for the benefit of the public good.	Insert new policy as follows: <b>Provide assistance to landowners to that have large areas of indigenous vegetation that meet the criteria of being significant</b>
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.009	Ecosystems and indigenous biodiversity	Policies	Not Stated	With the advent of myrtle rust, all Kunzea and Leptospermum taxa are currently considered threatened. The taxonomy and current threatened status of manuka and kanuka should be reflected and managed appropriately through objectives, policies and rules in the proposed plan. The relief sought is to be confirmed during the subsequent District Plan review stages once the 2022 version of the "Conservation status of New Zealand indigenous vascular plants" is available.	Amend objectives, policies and rules as appropriate to recognise and implement measures to address and manage the increased threat status of myrtle rust for manuka and kanuka
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.035	Ecosystems and indigenous biodiversity	Policies	Support in part	There are no scheduled SNAs within Schedule 4 of the Proposed District Plan. The Director-General is strongly opposed to this decision, which is considered contrary to section 6(c) of the RMA, the objectives and policies of the Regional Policy Statement for Northland, and the NPSIB exposure draft. The Director-General holds concerns that the wording of the policy in its current format will result in no SNAs being scheduled in the Proposed District Plan, as landowners will have the ability to refuse.	Insert a separate policy for mapping additional SNAs as they are identified
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.036	Ecosystems and indigenous biodiversity	Policies	Not Stated	The Director-General requests a new policy to ensure the characteristics that contribute to the significance of SNAs (i.e. fauna) are protected.	Insert new policy, with wording, or similar wording, as follows: <b>Recognise and protect SNAs by ensuring the</b>



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Conservation ) (S364)						characteristics that contribute to their significance are not adversely affected.
Matauri X Incorporation (S396)	S396.023	Ecosystems and indigenous biodiversity	Policies	Oppose	Matauri X do not believe that the provisions of the aforementioned Chapter appropriately meet section 6(e) of the RMA 1991. The approach also does not promote kaitiakitanga and the entire chapter is rejected.	delete policies
Northland Federated Farmers of New Zealand (S421)	S421.137	Ecosystems and indigenous biodiversity	Policies	Support in part	There are concerns that the policies do not provide for existing activities to continue. There needs to be an additional policy that recognises and provides for existing activities such as grazing and other farming activities to continue as long as the scale and intensity of effects do not / have not increased following the commencement date of the plan.	Insert a new policy as follows: <b>IB-P11 Provide recognition for grazing and farming existing activities that have not increased in their scale or intensity of effects from commencement date of the plan.</b> or wording with similar intent
Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)	S425.024	Ecosystems and indigenous biodiversity	Policies	Oppose	Council have not mapped 'significant natural areas' (SNA) but have included reference to SNA in rules. PHTTCCT consider the absence of mapping SNA will result in implementation confusion and unnecessary cost to PHTTCCT in order to determine compliance.	amend IB to: - Remove reference to significant natural areas in rules and rely on indigenous vegetation clearance thresholds.
Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)	S425.027	Ecosystems and indigenous biodiversity	Policies	Not Stated	Furthermore, the provisions do not adequately provide for the maintenance, operation and upgrade of regionally significant infrastructure in accordance with the RPS.	amend provisions to ensure that maintenance, operation and upgrade of regionally significant infrastructure is provided for.
John Andrew Riddell (S431)	S431.093	Ecosystems and indigenous biodiversity	Policies	Not Stated	The permitted activity rules applying to ecosystems and indigenous biodiversity are too permissive and do not achieve the purpose of the Act	Insert a further policy that recognises that not all significant natural areas will be mapped and that such unmapped areas are to have, as far as practicable, the same level of

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						protection in the proposed Plan as mapped Significant Natural Areas
John Andrew Riddell (S431)	S431.094	Ecosystems and indigenous biodiversity	Policies	Not Stated	Protection of indigenous biodiversity is a component of sustainable management of natural and physical resources via, for example sections 5(2)(b) and 6(c) of the Act.	<p>Insert the following policy:<b>That areas of significant indigenous vegetation and significant habitats of indigenous fauna be protected for the purpose of promoting sustainable management with attention being given to: (a) maintaining ecological values; (b) maintaining quality and resilience; (c) maintaining the variety and range of indigenous species contributing to biodiversity; (d) maintaining ecological integrity; and (e) maintaining tikanga Maori in the context of the above. Note: In determining whether a subdivision, use or development is appropriate in areas containing significant indigenous vegetation and significant habitats of indigenous fauna, Council shall consider each application on a case by case basis, giving due weight to Part II of the Act as well as those matters listed above</b></p>

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John Andrew Riddell (S431)	S431.095	Ecosystems and indigenous biodiversity	Policies	Not Stated	Protection of indigenous biodiversity is a component of sustainable management of natural and physical resources via, for example sections 5(2)(b) and 6(c) of the Act.	Insert the following policy: <b>That adverse effects on areas of significant indigenous vegetation and significant habitats of indigenous fauna are avoided, remedied or mitigated by: (a) seeking alternatives to the disturbance of habitats where practicable; (b) managing the scale, intensity, type and location of subdivision, use and development in a way that avoids, remedies or mitigates adverse ecological effects; (c) ensuring that where any disturbance occurs it is undertaken in a way that, as far as practicable: (i) minimises any edge effects; (ii) avoids the removal of specimen trees; (iii) does not result in linkages with other areas being lost; (iv) avoids adverse effects on threatened species; (v) minimises disturbance of root systems of remaining vegetation;(vi) does not result in the introduction of exotic weed species or pest animals;(d) encouraging, and where appropriate, requiring active pest control and avoiding the grazing of such areas</b>

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<b>John Andrew Riddell (S431)</b>	S431.096	Ecosystems and indigenous biodiversity	Policies	Not Stated	Protection of indigenous biodiversity is a component of sustainable management of natural and physical resources via, for example sections 5(2)(b) and 6(c) of the Act.	Insert the following policy: <b>That the contribution of areas of indigenous vegetation and habitats of indigenous fauna to the overall biodiversity and amenity of the District be taken into account in evaluating applications for resource consents.</b>
<b>John Andrew Riddell (S431)</b>	S431.097	Ecosystems and indigenous biodiversity	Policies	Not Stated	Protection of indigenous biodiversity is a component of sustainable management of natural and physical resources via, for example sections 5(2)(b) and 6(c) of the Act.	Insert the following policy: <b>In order to protect areas of significant indigenous fauna: (a) that dogs (excluding working dogs), cats, possums, rats, mustelids and other pest species are not introduced into areas with populations of kiwi, dotterel and brown teal; (b) in areas where dogs, cats, possums, rats, mustelids and other pest species are having adverse effects on indigenous fauna their removal is promoted</b>
<b>John Andrew Riddell (S431)</b>	S431.098	Ecosystems and indigenous biodiversity	Policies	Not Stated	Protection of indigenous biodiversity is a component of sustainable management of natural and physical resources via, for example sections 5(2)(b) and 6(c) of the Act.	Insert the following policy: <b>That when considering resource consent applications in areas identified as known high density kiwi habitat, the Council may impose</b>

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						<b>conditions, in order to protect kiwi and their habitat.</b>
<b>John Andrew Riddell (S431)</b>	S431.099	Ecosystems and indigenous biodiversity	Policies	Not Stated	Protection of indigenous biodiversity is a component of sustainable management of natural and physical resources via, for example sections 5(2)(b) and 6(c) of the Act.	Insert the following policy: <b>That habitat restoration be promoted.</b>
<b>John Andrew Riddell (S431)</b>	S431.100	Ecosystems and indigenous biodiversity	Policies	Not Stated	Protection of indigenous biodiversity is a component of sustainable management of natural and physical resources via, for example sections 5(2)(b) and 6(c) of the Act.	Insert the following policy: <b>That the maintenance of riparian vegetation and habitats be recognised and provided for, and their restoration encouraged, for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna, preservation of natural character and the maintenance of general ecosystem health and indigenous biodiversity</b>
<b>John Andrew Riddell (S431)</b>	S431.101	Ecosystems and indigenous biodiversity	Policies	Not Stated	Protection of indigenous biodiversity is a component of sustainable management of natural and physical resources via, for example sections 5(2)(b) and 6(c) of the Act.	Insert the following policy: <b>That when considering an application to clear areas of significant indigenous vegetation or significant habitats of indigenous fauna, enabling Maori to provide for the sustainable management of their ancestral land will be recognised and provided for by Council</b>

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<b>Kapiro Conservation Trust (S442)</b>	S442.174	Ecosystems and indigenous biodiversity	Policies	Support	Need to include a policy of identifying areas of significant indigenous biodiversity that are likely to be particularly vulnerable and/or change in their location and extent due to the effects of climate change and establish buffer zones where appropriate. An example is ensuring there are buffer zones around coastal wetlands that anticipate and provide for inland retreat.	Insert new policy <b>Identify areas of significant indigenous biodiversity that are particularly vulnerable and/or likely to change in their location and extent due to the effects of climate change and, where appropriate, establish buffer zones to ensure that these areas are able to move and persist.</b>
<b>Top Energy Limited (S483)</b>	S483.146	Ecosystems and indigenous biodiversity	Policies	Not Stated	Top Energy acknowledges that objectives and policies for infrastructure within SNAs are located within the Infrastructure Chapter but seek to ensure that appropriate provision for operation, repair, maintenance and upgrade of electricity infrastructure (in particular) is made in the objectives and policies of this Chapter in alignment with method 4.6.3, Policies 5.1.2 and 5.1.3 given that it also relates to indigenous vegetation clearance not captured as significant	Insert additional policies that recognise the need for the location of new infrastructure within areas containing indigenous biodiversity where there is an operational and functional need, and any adverse effects are adequately managed. Insert additional policy that provides for the operation, maintenance repair and upgrading of infrastructure within areas of indigenous biodiversity.
<b>Carbon Neutral NZ Trust (S529)</b>	S529.116	Ecosystems and indigenous biodiversity	Policies	Oppose	The PDP provisions do not provide the level of protection noted in the RMA, Te Mana o te Taiao, anticipated NPS for indigenous biodiversity, Regional Policy Statement, Environment Court decision	Amend the PDP policies to reflect the level of protection in the RMA, Te Mana o te Taiao, anticipated NPS for indigenous biodiversity, Regional Policy Statement, Environment Court decision
<b>Carbon Neutral NZ Trust (S529)</b>	S529.120	Ecosystems and indigenous biodiversity	Policies	Support in part		Amend the PDP policies, to implement the objectives to 'protect, maintain and increase indigenous biodiversity for future generations', or protect significant vegetation and fauna 'for future generations

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<b>Carbon Neutral NZ Trust (S529)</b>	S529.132	Ecosystems and indigenous biodiversity	Policies	Support in part	<p>A large number of indigenous species are currently classed as threatened or at risk under the national NZ Threat Classification System.<sup>4</sup> About 50 indigenous bird species have become extinct in Aotearoa New Zealand as a result of human activities.<sup>5</sup> Many technical and policy reports have noted that concerted action is required to prevent further deterioration.<sup>6</sup></p> <p>As noted above, RMA s31(1) applies to decision-making in relation to the use and development of land - District Council functions include 'the control of any actual or potential effects of the use, development, or protection of land, including for the purpose of ... (iii) the maintenance of indigenous biological diversity'.</p> <p>The Regional Policy Statement for Northland and Regional Plan contain a number of provisions that refer to aspects of biodiversity that are not about mapped SNAs (Box 1, below, provides examples). As noted above, under s75 of the RMA, the DP is required to give effect to the Regional Policy Statement, and must avoid inconsistency with the Regional Plan. The DP can be more stringent than the RPS, but cannot be more relaxed</p>	Amend the policies to address RPS s4.4 regarding 'Maintaining and enhancing indigenous ecosystems and species' and 'indigenous taxa that are listed as threatened or at risk'.
<b>Carbon Neutral NZ Trust (S529)</b>	S529.138	Ecosystems and indigenous biodiversity	Policies	Not Stated	<p>We consider that the DP should include Policy similar to Policy 12.2.4.10 of the Operative DP but with the aim of protecting not just kiwi, dotterel and brown teal, but also other indigenous species that are classed as threatened or at risk (under NZTCS) and vulnerable to this type of predation.</p>	Insert new policy to protect kiwi, dotterel, brown teal and also other indigenous species that are classed as threatened or at risk (under NZTCS) and vulnerable to this type of predation.
<b>Marianna Fenn (S542)</b>	S542.004	Ecosystems and indigenous biodiversity	Policies	Support	<p>Need to include a policy of identifying areas of significant indigenous biodiversity that are likely to be particularly vulnerable and/or change in their location and extent due to the effects of climate change and establish buffer zones where appropriate. An example is ensuring there are buffer zones around</p>	Add new policy <b>Identify areas of significant indigenous biodiversity that are particularly vulnerable and/or likely to change in their location and</b>

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					coastal wetlands that anticipate and provide for inland retreat	<b>extent due to the effects of climate change and, where appropriate, establish buffer zones to ensure that these areas are able to move and persist</b>
<b>Martin John Yuretich (S40)</b>	S40.005	Ecosystems and indigenous biodiversity	IB-P1	Oppose	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<p>Amend the PDP to reflect the submission as follows:</p> <ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Modify the approach to work in partnership with landowners (given that the Council is required to undertake mapping and identification of SNAs under the NPS-IB)</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• Include the option of a simple bush protection covenant by consent notice if owners wish to protect their bush, not just Reserves Act and QEII covenants</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>



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<b>Joel Vieviorka (S41)</b>	S41.005	Ecosystems and indigenous biodiversity	IB-P1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	Amend the PDP to reflect the submission as follows:: <ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Modify the approach to work in partnership with landowners (given that the Council is required to undertake mapping and identification of SNAs under the NPS-IB)</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• Include the option of a simple bush protection covenant by consent notice if owners wish to protect their bush, not just Reserves Act and QEII covenants</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<b>Paul O'Connor (S49)</b>	S49.003	Ecosystems and indigenous biodiversity	IB-P1	Oppose	Removal of SNA maps form the PDP is unnecessary and puts the onus on landowners to prove bush on their property is not an SNA. This necessitates engaging and ecologist at their expense. It is not fair to assume all bush is under SNA unless proven otherwise.	Amend to assist land owners with theSNA identification process - thus encouraging them to protect SNA areas.

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<b>Michael John Winch (S67)</b>	S67.002	Ecosystems and indigenous biodiversity	IB-P1	Support	My property at Totara North (Allot 25 Parish of Totara) comprises 35ha of mature native forest that meets the criteria for a Significant Natural Area in Appendix 5 of the RPS. The whole of the title is subject to a QEII Open Space covenant. I agree to the land being identified as a SNA in Schedule 4 of the District Plan.	retain policy IB-P1
<b>Strand Homes Ltd/Okahu Developments Ltd (S77)</b>	S77.004	Ecosystems and indigenous biodiversity	IB-P1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	<p>Amend to:</p> <ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>

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<b>Lynley Newport (S128)</b>	S128.001	Ecosystems and indigenous biodiversity	IB-P1	Support in part	Relegate Policy IB-P1 to follow IB-6. This policy should refer to SUB-R6 environmental benefit) as another time/method to assess the significance of indigenous vegetation, potentially also SUB-R7 (Management Plan).	Amend Policy IB-P1 by relegating it to follow what is currently Policy IB-P6. Amend by adding an (f) written along similar lines to (e) but referring to the Environmental Benefit Subdivision rule: <i>"requiring an assessment of the ecological significance of indigenous vegetation when subdividing pursuant to Rules SUB-R6 or SUB-R7"</i>
<b>Trevor John Ashford (S146)</b>	S146.005	Ecosystems and indigenous biodiversity	IB-P1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	Amend to: <ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> </ul>

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						<ul style="list-style-type: none"> <li>Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<b>Summit Forests New Zealand Limited (S148)</b>	S148.016	Ecosystems and indigenous biodiversity	IB-P1	Not Stated	<p>SFNZ acknowledges the statements made regarding the high proportion of the District that has potentially significant ecological values and the fact that over half of those lands are in private ownership. As noted, this creates potential tension between those seeking to protect those areas and those wishing to make reasonable economic use of their lands. It is essential that the Plan takes a pragmatic approach to protecting significant natural areas and allowing people to meet their social, economic, and cultural wellbeing by:</p> <ul style="list-style-type: none"> <li>- Ensuring there is certainty about what is or is not an SNA including drawing clear boundaries between rural production areas and SNA and ensuring there is reliable mapping of SNA across the district.</li> <li>- Supporting landowners with the costs of identifying and managing SNA on their lands</li> <li>- Avoiding unnecessary compliance costs associated with potential SNA and rural production activities.</li> </ul> <p>IB-P1 should explicitly state that Council will work with landowners to accurately map all SNA across the district.</p>	Amend IB-P1 to clearly state that Council will "work with all landowners to accurately map and schedule all SNA within the district" or words of like effect
<b>Manulife Forest Management (NZ) Ltd (S160)</b>	S160.016	Ecosystems and indigenous biodiversity	IB-P1	Support in part	<p>The submitter supports policy IB-P1, in part and considers that the mapping of SNAs is critical to provide certainty to the landowner and that relying on a definition that is open to interpretation or requires experts to carry out surveys is not conducive to managing SNAs.</p>	Amend policy IB-P1 to state all SNAs will be mapped.
<b>Shanon Garton (S161)</b>	S161.004	Ecosystems and indigenous biodiversity	IB-P1	Oppose	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to</p>	<p>Amend to:</p> <ul style="list-style-type: none"> <li>Acknowledge that ratepayers have managed to enhance the SNAs in the District,</li> </ul>

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					<p>engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<p>instead of forcing them to do this, facilitate and assist them in what they are already doing</p> <ul style="list-style-type: none"> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<p><b>Julianne Sally Bainbridge (S163)</b></p>	<p>S163.008</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-P1</p>	<p>Oppose</p>	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for</p>	<p>Amend the Plan:</p> <ul style="list-style-type: none"> <li>• to acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• to modify the approach to work in partnership with landowners</li> <li>• to provide incentives (support and resources), not disincentives, for landowners</li> </ul>

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					the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	<p>to enhance the natural biodiversity of their land</p> <ul style="list-style-type: none"> <li>to provide the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants</li> <li>to make SNA mapping available publicly, even if it is not part of the PDP</li> </ul>
<b>Bentzen Farm Limited (S167)</b>	S167.015	Ecosystems and indigenous biodiversity	IB-P1	Oppose	This policy cannot be achieved unless by way of 4th schedule process private plan change which is an unreasonable burden to place on landowners.	Delete Policy IB-P1
<b>Setar Thirty Six Limited (S168)</b>	S168.022	Ecosystems and indigenous biodiversity	IB-P1	Oppose	This policy cannot be achieved unless by way of 4th schedule process private plan change which is an unreasonable burden to place on landowners.	Delete Policy IB-P1
<b>The Shooting Box Limited (S187)</b>	S187.015	Ecosystems and indigenous biodiversity	IB-P1	Oppose	This policy cannot be achieved unless by way of 4th schedule process private plan change which is an unreasonable burden to place on landowners.	Delete Policy IB-P1.
<b>Thomson Survey Ltd (S192)</b>	S192.001	Ecosystems and indigenous biodiversity	IB-P1	Support in part	<p>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.</p> <p>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).</p>	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";

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					<p>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?</p> <p>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.</p>	
<p><b>Wendover Two Limited (S222)</b></p>	<p>S222.022</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-P1</p>	<p>Oppose</p>	<p>Policy IB-P1 seeks to "encouraging landowners to include identified Significant Natural Areas in Schedule 4 of the District Plan at the time of subdivision and development;..."</p> <p>This policy cannot be achieved unless by way of 4th schedule process private plan</p>	<p>Delete Policy IB-P1</p>

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					change which is an unreasonable burden to place on landowners.	
<b>Matauri Trustee Limited (S243)</b>	S243.024	Ecosystems and indigenous biodiversity	IB-P1	Oppose	Policy IB-P1 seeks to "encouraging landowners to include identified Significant Natural Areas in Schedule 4 of the District Plan at the time of subdivision and development;..." This policy cannot be achieved unless by way of 4th schedule process private plan change which is an unreasonable burden to place on landowners.	Delete Policy IB-P1
<b>Amber Hookway (S261)</b>	S261.005	Ecosystems and indigenous biodiversity	IB-P1	Oppose	Following protests by tangata whenua, farmers and other landowners who said the proposal to identify land as SNAs undermined their sovereignty and property rights, this opposition culminated in a large hiko to the Council's Kaikohe headquarters where tangata whenua delivered a petition against the process. Encouraging landowners to include identified Significant Natural Areas in Schedule 4 of the District Plan at the time of subdivision and development; implies this is voluntary when it clearly isn't.	Delete SNAs/wetlands from the Proposed District Plan and reinstate Policy 13.4.6 from the Operative District Plan: <b>That any subdivision proposal provides for the protection, restoration and enhancement of heritage resources, areas of significant indigenous vegetation and significant habitats of indigenous fauna, threatened species, the natural character of the coastal environment and riparian margins, and outstanding landscapes and natural features where appropriate.</b>
<b>Wilson Hookway (S264)</b>	S264.005	Ecosystems and indigenous biodiversity	IB-P1	Oppose	Following protests by tangata whenua, farmers and other landowners who said the proposal to identify land as SNAs undermined their sovereignty and property rights, this opposition culminated in a large hiko to the Council's Kaikohe headquarters where tangata whenua delivered a petition against the process. Encouraging landowners to include identified Significant Natural Areas in Schedule 4 of the District Plan at the time of subdivision and	Delete SNAs/wetlands from the Proposed District Plan and reinstate Policy 13.4.6 from the Operative District Plan: <b>That any subdivision proposal provides for the protection, restoration and enhancement of heritage resources, areas of significant indigenous vegetation and</b>



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					development; implies this is voluntary when it clearly isn't.	<b>significant habitats of indigenous fauna, threatened species, the natural character of the coastal environment and riparian margins, and outstanding landscapes and natural features where appropriate.</b>
<b>P S Yates Family Trust (S333)</b>	S333.015	Ecosystems and indigenous biodiversity	IB-P1	Oppose	Policy IB-P1 seeks to "encouraging landowners to include identified Significant Natural Areas in Schedule 4 of the District Plan at the time of subdivision and development;..." This policy cannot be achieved unless by way of 4th schedule process private plan change which is an unreasonable burden to place on landowners	Delete Policy IB-P1
<b>Te Aupōuri Commercial Development Ltd (S339)</b>	S339.025	Ecosystems and indigenous biodiversity	IB-P1	Not Stated	The PDP relies primarily on the identification of SNA's by using the methods and criteria outlined in Appendix 5 of the RPS. However, the criteria are principally based on ecological values and there is no provision or recognition of te ao Māori values or mātauranga Māori. In TACDL's view, IB-P1 needs to be broadened to ensure the following is achieved: - Engagement with tangata whenua is undertaken as part of the identification of any SNA's; - Mātauranga and tikanga Māori is incorporated. Further, in TACDL's view, this policy lacks clarity and purpose as an identification policy as it includes other directives that do not relate to identification. Finally, TACDL oppose the inclusion of clause (e) as they consider this to be overly onerous and inappropriate. For these reasons, TACDL seek amendments to improve clarity and legibility. On this basis, TACDL considers separate	Amend Policy IB-P1 to delete points c, d and e, and insert a new point as follows: Identify Significant Natural Areas by: a... b... ; <b>and c. engaging with the mana whenua of the area to identify taonga species in accordance with mātauranga Māori.</b> <del>c. encouraging landowners to include identified Significant Natural Areas in Schedule 4 of the District Plan at the time of subdivision and development;</del> d. providing assistance to landowners to add Significant Natural Areas to Schedule 4 of the District Plan; <del>and e. requiring an assessment of the ecological significance for</del>

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					policies need to be created to provide direction for the desired outcomes.	<del>indigenous vegetation clearance to establish permitted activity thresholds in Rule IB-R2-R4.</del>
<b>Sapphire Surveyors Limited (S348)</b>	S348.011	Ecosystems and indigenous biodiversity	IB-P1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	<p>Amend the PDP to reflect the submission as follows:</p> <ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Modify the approach to work in partnership with landowners (given that the Council is required to undertake mapping and identification of SNAs under the NPS-IB)</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• Include the option of a simple bush protection covenant by consent notice if owners wish to protect their bush, not just Reserves Act and QEII covenants</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<b>Wakaiti Dalton (S355)</b>	S355.019	Ecosystems and	IB-P1	Support in part	The PDP relies primarily on the identification of SNA's by using the methods and criteria outlined in Appendix 5 of the RPS. However,	Amend That requires engagement with tangata whenua to identify areas of significant ecosystems and

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		indigenous biodiversity			the criteria are principally based on ecological values and there is no provision or recognition of te ao Māori values or mātauranga Māori. In our view, IB-P1 needs to be broadened to ensure the following is achieved: - Engagement with tangata whenua is undertaken as part of the identification of any SNA's;- Mātauranga and tikanga Māori is incorporated. Additionally, it is considered that clarity and coherence of this policy would be improved by narrowing its focus to identification related directions only and establishing new policies to encourage protection and provide assistance.	biodiversity, particularly for the identification of taonga species Delete clauses (c) - (e) of policy IB-P1.
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.061	Ecosystems and indigenous biodiversity	IB-P1	Support	not stated	Retain IB-P1 as notified
<b>Sean Frieling (S357)</b>	S357.034	Ecosystems and indigenous biodiversity	IB-P1	Oppose	Despite clear opposition to SNA mapping, provisions in the PDP have retained the essence of the SNA mapping, but with the added expense to landowners to have to engage an ecologist to prove that the bush on their property is not an SNA. None of the methods in policy IB-P6 have been given effect under the PDP. Overall rural landowners have of their own volition increased not decreased the areas of SNA. Council is now creating rules in relation to these areas that create a disincentive for landowners to restore wetlands, waterways and bush areas. Support the development bonus provisions for allow for smaller lot sizes in the rural production zone for any subdivision that provides protection of indigenous vegetation.	Acknowledge that ratepayers have managed to enhance the SNA in the District, facilitate and assist them in what they are already doing. Modify the approach to mapping and identification of SNA in accordance with the draft NPS for indigenous biodiversity. Insert incentives, not disincentives for landowners to enhance the natural biodiversity of their land. Amend the options for bush protection. Make SNA mapping available to the public.
<b>Director-General of Conservation (Department of</b>	S364.034	Ecosystems and indigenous biodiversity	IB-P1	Support in part	There are no scheduled SNAs within Schedule 4 of the Proposed District Plan. The Director-General is strongly opposed to this decision, which is considered contrary to section 6(c) of the RMA, the objectives and	Amend Policy IB-P1 as follows: Identify Significant Natural Areas by: a. using the ecological significance criteria in Appendix 5 of the RPS or in any more recent National Policy

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<p><b>Conservation ) (S364)</b></p>					<p>policies of the Regional Policy Statement for Northland, and the NPSIB exposure draft. The Director-General holds concerns that the wording of the policy in its current format will result in no SNAs being scheduled in the Proposed District Plan, as landowners will have the ability to refuse. It is requested that the wording of Policy IB-P1 be amended to ensure areas that meet SNA criteria are suitably protected.</p> <p>The Director-General encourages ground truthing/physical inspection to ensure the areas scheduled as SNAs meet the relevant criteria.</p>	<p>Statement on indigenous biodiversity;<del>b.including areas that meet the ecological significance criteria as Significant Natural Areas in Schedule 4 of the District Plan and on the planning maps where this is agreed with the landowner and verified by physical inspection where practicable;c. encouraging landowners to include including identified Significant Natural Areas in Schedule 4 of the District Plan at the time of subdivision and development;d. providing assistance to landowners to add Significant Natural Areas to Schedule 4 of the District Plan; and e. requiring an assessment of the ecological significance for indigenous vegetation clearance to establish permitted activity thresholds in Rule IBR2-R4.</del></p>
<p><b>Far North District Council (S368)</b></p>	<p>S368.089</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-P1</p>	<p>Support in part</p>	<p>Minor drafting change to improve readability in e.</p>	<p>Amend IB-P1</p> <p>a. using the ecological significance criteria in Appendix 5 of the RPS or in any more recent National Policy Statement on indigenous biodiversity;</p> <p>b. including areas that meet the ecological significance criteria as Significant Natural Areas in Schedule 4 of the District Plan and on the</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>planning maps where this is agreed with the landowner and verified by physical inspection where practicable;</p> <p>c. encouraging landowners to include identified Significant Natural Areas in Schedule 4 of the District Plan at the time of subdivision and development;</p> <p>d. providing assistance to landowners to add Significant Natural Areas to Schedule 4 of the District Plan; and</p> <p>e. requiring an assessment of the ecological significance for indigenous vegetation clearance to establish <b>compliance with the permitted activity thresholds in Rules IB-R2 to IB-R4</b></p>
<p><b>Rua Hatu Trust (S377)</b></p>	<p>S377.005</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-P1</p>	<p>Oppose</p>	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<p>Amend to:</p> <ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>to enhance the natural biodiversity of their land</p> <ul style="list-style-type: none"> <li>If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<p><b>Sean Jozef Vercammen (S395)</b></p>	<p>S395.005</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-P1</p>	<p>Oppose</p>	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<p>Amend to:</p> <ul style="list-style-type: none"> <li>Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<ul style="list-style-type: none"> <li>Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.057	Ecosystems and indigenous biodiversity	IB-P1	Not Stated	Council is required to map significant natural areas. "Encouraging" landowners at the time of subdivision and development is inadequate to achieve this requirement. When resource consent is required is one of the few opportunities Council has to exert control over this process.	Amend point c. of Policy IB-P1 as follows: c. <b>encouraging requiring</b> landowners to include identified Significant Natural Areas in Schedule 4 of the District Plan at the time of subdivision and development;
<b>Kerry-Anne Smith (S410)</b>	S410.005	Ecosystems and indigenous biodiversity	IB-P1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	Amend to: <ul style="list-style-type: none"> <li>Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>Reserves Act and QEII covenants.</p> <ul style="list-style-type: none"> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<b>Roger Myles Smith (S411)</b>	S411.005	Ecosystems and indigenous biodiversity	IB-P1	Oppose	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<b>John Andrew Riddell (S431)</b>	S431.090	Ecosystems and indigenous biodiversity	IB-P1	Not Stated	<p>Protection of indigenous biodiversity is a component of sustainable management of natural and physical resources via, for example sections 5(2)(b) and 6(c) of the Act. Further directive guidance on the protection and enhancement of indigenous biodiversity</p>	<p>Delete Policies IB-P1, IB-P2 and IB-P3 and replace with a reproduced Policy 4.4.1 of the Regional Policy Statement.</p>



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					is given by policy 11 of the Coastal Policy Statement and policy 4.4.1 of the Regional Policy Statement. The proposed Plan does not give effect to these policies.	
<b>John Joseph and Jacqueline Elizabeth Matthews (S439)</b>	S439.005	Ecosystems and indigenous biodiversity	IB-P1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	Amend Policy IB-P1: <ul style="list-style-type: none"> <li>to acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>to work in partnership with landowners given that the council is required to undertake mapping and identification of SNAs under the NPS-IB</li> <li>to provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>to provide the option of a simple bush protection covenant by consent notice if owners wish to protect their bush, not just Reserves Act and QEII covenants</li> <li>to make SNA mapping available publicly, even if it is not part of the PDP</li> </ul>
<b>Kapiro Conservation Trust (S442)</b>	S442.076	Ecosystems and indigenous biodiversity	IB-P1	Oppose	SNAs need to be identified and mapped throughout the district not just where landowners agree.	Amend to reflect district wide mapping and rules applicable to SNAs.
<b>Kapiro Conservation Trust (S442)</b>	S442.175	Ecosystems and indigenous biodiversity	IB-P1	Oppose	If SNAs are to be protected for future generations they must be identified and mapped throughout the district. This will serve to educate landowners about the value	Amend to reflect district wide mapping and rules applicable to SNAs. If SNAs based solely on the presence of regenerating manuka / kanuka are

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					of biodiversity on their land, enable targeted support, and address the risk of incremental district wide loss and degradation of SNA areas.	included, these areas should be separately identified and clearly distinguished from other SNAs. These manuka / kanuka SNAs could also be subject to a separate, slightly more permissive, rule regime. A large percentage of our property at 903B Kohumaru Rd is identified as SNA and, subject to the boundaries of those SNA areas being refined, I support that designation.
<b>LJ King Ltd (S464)</b>	S464.005	Ecosystems and indigenous biodiversity	IB-P1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	<ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP</li> </ul>

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<b>Helmut Friedrich Paul Letz and Angelika Eveline Letz (S470)</b>	S470.005	Ecosystems and indigenous biodiversity	IB-P1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	<ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<b>Michael Foy (S472)</b>	S472.042	Ecosystems and indigenous biodiversity	IB-P1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine	<ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified</li> </ul>

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					whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	<p>to work in partnership with landowners</p> <ul style="list-style-type: none"> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<b>Adams-Te Whata Whanau Trust (S473)</b>	S473.003	Ecosystems and indigenous biodiversity	IB-P1	Support in part	IB-P1 as a pensioner, I am concerned about the cost of obtaining an assessment of the ecological significance for indigenous vegetation clearance to establish permitted activity thresholds in rule R2-R4. I received no income from my land.	amend IB-P1 for Council to provide assessments of ecological significance for indigenous vegetation clearance, or fund or contribute to the costs of beneficiaries needing to obtain an assessment of the ecological significance of their land
<b>Tracy and Kenneth Dalton (S479)</b>	S479.013	Ecosystems and indigenous biodiversity	IB-P1	Oppose	The PDP relies primarily on the identification of SNA's by using the methods and criteria outlined in Appendix 5 of the RPS. However, the criteria are principally based on ecological values and there is no provision or recognition of te ao Māori values or mātauranga Māori. In our view, IB-P1 needs to be broadened to ensure the following is achieved: Engagement with tangata whenua is undertaken as part of the identification of any SNA's; Mātauranga and tikanga Māori is incorporated.	Amend the policy to require engagement with tangata whenua to identify areas of significant ecosystems and biodiversity, particularly for the identification of taonga species.
<b>Tracy and Kenneth Dalton (S479)</b>	S479.014	Ecosystems and	IB-P1	Oppose	It is considered that clarity and coherence of this policy would be improved by narrowing its focus to identification related directions	Delete clauses (c) - (e) of policy IB-P1.

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		indigenous biodiversity			only and establishing new policies to encourage protection and provide assistance.	
<b>Elbury Holdings (S485)</b>	S485.044	Ecosystems and indigenous biodiversity	IB-P1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	<ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.057	Ecosystems and indigenous biodiversity	IB-P1	Oppose	SNAs need to be identified and mapped throughout the district not just where landowners agree	Amend to reflect district wide mapping and rules applicable to SNAs
<b>Elbury Holdings (S519)</b>	S519.044	Ecosystems and	IB-P1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the	<ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District,</li> </ul>

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		indigenous biodiversity			concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	<p>instead of forcing them to do this, facilitate and assist them in what they are already doing</p> <ul style="list-style-type: none"> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<b>Elbury Holdings (S541)</b>	S541.005	Ecosystems and indigenous biodiversity	IB-P1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial	<ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified</li> </ul>

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					assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	<p>to work in partnership with landowners</p> <ul style="list-style-type: none"> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<b>Marianna Fenn (S542)</b>	S542.005	Ecosystems and indigenous biodiversity	IB-P1	Oppose	If SNAs are to be protected for future generations they must be identified and mapped throughout the district. This will serve to educate landowners about the value of biodiversity on their land, enable targeted support, and address the risk of incremental district wide loss and degradation of SNA areas	Amend to reflect district wide mapping and rules applicable to SNAs. If SNAs based solely on the presence of regenerating manuka / kanuka are included, these areas should be separately identified and clearly distinguished from other SNAs. These manuka / kanuka SNAs could also be subject to a separate, slightly more permissive, rule regime. A large percentage of our property at 903B Kohumaru Rd is identified as SNA and, subject to the boundaries of those SNA areas being refined, I support that designation
<b>LJ King Limited (S543)</b>	S543.005	Ecosystems and indigenous biodiversity	IB-P1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA.	<ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> </ul>

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					<p>Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<ul style="list-style-type: none"> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP</li> </ul>
<p><b>Kelvin Richard Horsford (S544)</b></p>	<p>S544.005</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-P1</p>	<p>Oppose</p>	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> </ul>



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						<ul style="list-style-type: none"> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP</li> </ul>
<p><b>LJ King Limited (S547)</b></p>	<p>S547.005</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-P1</p>	<p>Oppose</p>	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.</li> <li>• Make SNA mapping available publicly, even if it is not part of the PDP</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Te Rūnanga o Ngāti Rēhia (S559)</b>	S559.019	Ecosystems and indigenous biodiversity	IB-P1	Oppose	Biodiversity and its continued protection are important to Ngāti Rēhia. Our whakapapa connects us to all our native fauna and flora. It is our kaitiaki responsibility to listen to our native fauna and flora and be their voice. Māori land is usually undeveloped land, historically we were not provided the same ability to lend, receive subsidies, or grants to allow us to develop at the same way as non-Māori. This has left Māori as owners of majority of the large parcels of land that have high biodiversity values in the Far North outside of the Crown owned conversation blocks. Policy and rules should not impact our ability utilise our whenua in a way that will help us to provide social, cultural and economic prosperity for our people. The current approach to provisions is not considered to meet s6(e) of the RMA.	Delete IB-P1 and redraft with tangata whenua (inferred).
<b>Rodney S Gates and Cherie R Gates (S569)</b>	S569.005	Ecosystems and indigenous biodiversity	IB-P1	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above provisions have retained the essence of the SNA mapping, but with the added expense to landowner to have to engage an ecologist to prove that the bush on their property is NOT an SNA. Despite policy IB-P6(a,) which recommends Council's consideration of "assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a SNA", any financial assistance will still be at ratepayer's expense, having already footed the bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	<ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing</li> <li>• Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners</li> <li>• Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land</li> <li>• If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice</li> </ul>

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						<p>should be available, not just Reserves Act and QEII covenants.</p> <ul style="list-style-type: none"> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<b>Bentzen Farm Limited (S167)</b>	S167.016	Ecosystems and indigenous biodiversity	IB-P2	Oppose	Because areas of Significant Natural Area are not mapped, avoidance can only be achieved in relation to areas of significant indigenous vegetation and significant habitats of indigenous fauna. The change proposed by this submission gives effect to the requirements of the NZCPS 2010.	Amend Policy IB-P2 as follows: Within the coastal environment: a. avoid adverse effects of land use and subdivision on <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna;</b> and b. avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on areas of important and vulnerable indigenous vegetation, habitats and ecosystems.
<b>Setar Thirty Six Limited (S168)</b>	S168.023	Ecosystems and indigenous biodiversity	IB-P2	Oppose	Because areas of Significant Natural Area are not mapped, avoidance can only be achieved in relation to areas of significant indigenous vegetation and significant habitats of indigenous fauna. The change proposed by this submission gives effect to the requirements of the NZCPS 2010	Amend Policy IB-P2 as follows: Within the coastal environment: a. avoid adverse effects of land use and subdivision on <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna;</b> and ...
<b>The Shooting Box Limited (S187)</b>	S187.016	Ecosystems and	IB-P2	Oppose	Because areas of Significant Natural Area are not mapped, avoidance can only be achieved in relation to areas of significant	Amend Policy IB-P2 as follows: Within the coastal environment: a. avoid adverse effects of land use

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		indigenous biodiversity			indigenous vegetation and significant habitats of indigenous fauna. The change proposed by this submission gives effect to the requirements of the NZCPS 2010.	and subdivision on Significant Natural Areas areas of significant indigenous vegetation and significant habitats of indigenous fauna □ and b. avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on areas of important and vulnerable indigenous vegetation, habitats and ecosystems.
<b>The Shooting Box Limited (S187)</b>	S187.017	Ecosystems and indigenous biodiversity	IB-P2	Oppose	Because areas of Significant Natural Area are not mapped, avoidance can only be achieved in relation to areas of significant indigenous vegetation and significant habitats of indigenous fauna. The change proposed by this submission gives effect to the requirements of the NZCPS 2010.	Amend Policy IB-P2 as follows: Within the coastal environment: a. avoid adverse effects of land use and subdivision on <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna;</b> and b. avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on areas of important and vulnerable indigenous vegetation, habitats and ecosystems.
<b>Wendover Two Limited (S222)</b>	S222.023	Ecosystems and indigenous biodiversity	IB-P2	Support in part	Because areas of Significant Natural Area are not mapped, avoidance can only be achieved in relation to areas of significant indigenous vegetation and significant habitats of indigenous fauna. The change proposed by this submission gives effect to the requirements of the NZCPS 2010.	Amend Policy IB-P2 as follows: Within the coastal environment: a. avoid adverse effects of land use and subdivision on <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna ;and</b>

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						b. avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on areas of important and vulnerable indigenous vegetation, habitats and ecosystems.
<b>Matauri Trustee Limited (S243)</b>	S243.025	Ecosystems and indigenous biodiversity	IB-P2	Oppose	Because areas of Significant Natural Area are not mapped, avoidance can only be achieved in relation to areas of significant indigenous vegetation and significant habitats of indigenous fauna. The change proposed by this submission gives effect to the requirements of the NZCPS 2010.	Amend Policy IB-P2 as follows: Within the coastal environment: a. avoid adverse effects of land use and subdivision on <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> ; and b. avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on areas of important and vulnerable indigenous vegetation, habitats and ecosystems.
<b>P S Yates Family Trust (S333)</b>	S333.016	Ecosystems and indigenous biodiversity	IB-P2	Support in part	Because areas of Significant Natural Area are not mapped, avoidance can only be achieved in relation to areas of significant indigenous vegetation and significant habitats of indigenous fauna. The change proposed by this submission gives effect to the requirements of the NZCPS 2010.	Amend Policy IB-P2 as follows: Within the coastal environment: a. avoid adverse effects of land use and subdivision on <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> ; and b. avoid significant adverse

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						effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on areas of important and vulnerable indigenous vegetation, habitats and ecosystems.
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.063	Ecosystems and indigenous biodiversity	IB-P2	Oppose	There is slight confusion and duplication in relation to IP-02 and this needs to be clarified to ensure these provisions complement and work together.	Amending as follows: Within the coastal environment: a. avoid adverse effects of land use and subdivision on the <b>qualities and characteristics</b> of Significant Natural Areas; and b. avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on areas of important and vulnerable indigenous vegetation, habitats and ecosystems; <b>and</b> c. <b>In relation to infrastructure, Policy IP2 also applies.</b>
<b>Director-General of Conservation (Department of Conservation) (S364)</b>	S364.037	Ecosystems and indigenous biodiversity	IB-P2	Support in part	The Director-General requests Policy IB-P2 be updated to give effect to Policy 11(a) of the NZCPS	Amend 'clause a' of Policy IB-P2 to incorporate the wording under Policy 11(a) of the NZCPS.
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.058	Ecosystems and indigenous biodiversity	IB-P2	Not Stated	Policy 11 of the New Zealand Coastal Policy Statement refers specifically to threatened and at risk taxa of flora and fauna as well as ecosystems and habitats. The policy as written does not specifically provide for threatened and at risk species. On that basis	Amend Policy IB-P2 as follows: Within the coastal environment: a) avoid adverse effects of land use and subdivision on Significant Natural Areas, <b>indigenous taxa that are listed as threatened or at risk in</b>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Policy IB-I2 is not consistent with the National Policy Statement.	<p><b>the New Zealand Threat Classification System lists; indigenous ecosystems and vegetation types that are threatened in the coastal environment, or are naturally rare, habitats of indigenous species where the species are at the limit of their natural range, or are naturally rare, areas containing nationally significant examples of indigenous community types; and areas set aside for full or partial protection of indigenous biological diversity under other legislation, and.</b></p> <p>b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on areas of important <del>and vulnerable</del> indigenous <del>species vegetation,</del> habitats and ecosystems</p>
<b>John Andrew Riddell (S431)</b>	S431.091	Ecosystems and indigenous biodiversity	IB-P2	Not Stated	Protection of indigenous biodiversity is a component of sustainable management of natural and physical resources via, for example sections 5(2)(b) and 6(c) of the Act. Further directive guidance on the protection and enhancement of indigenous biodiversity is given by policy 11 of the Coastal Policy Statement and policy 4.4.1 of the Regional Policy Statement. The proposed Plan does not give effect to these policies.	Delete Policies IB-P1, IB-P2 and IB-P3 and replace with a reproduced Policy 4.4.1 of the Regional Policy Statement.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Kapiro Conservation Trust (S442)</b>	S442.077	Ecosystems and indigenous biodiversity	IB-P2	Oppose	RMA, s75 says a district plan must give effect to the NZCPS and the RPS. This policy is a good start, however, this policy does not give full effect to the RPS, policy 4.4.1(1). And NZCPS policy 11 For example the NZCPS, policy 11(a) and the RPS, policy 4.4.1(1)(a) requires the avoidance of adverse effects on indigenous taxa that are listed as threatened or at-risk. Reliance solely on the criteria may not necessarily pick these matters up. These need to be expressly listed in the plan to give full effect to the higher order documents. Also (b) only picks up one of the matters in RPS, policy 4.4.1(2) when there actually 3. Also the NZCPS, policy 11(b) lists 6 individually. A useful comparison and perhaps template is the proposed Northland Regional Plan, policy D.2.18 or the Whangarei District Plan, CA. 1.3 (4) and . This policy mirrors the RPS, policy 4.4.1. RMA, s75(4) and (5) says a district plan must not be inconsistent with a regional plan.	Amend to give full effect to RPS and the NZCPS, policy 11(a) and (b).
<b>Transpower New Zealand Ltd (S454)</b>	S454.083	Ecosystems and indigenous biodiversity	IB-P2	Not Stated	A consequential amendment to this policy is required to ensure that the FNPDP gives effect to the NPSET as set out in the submission point on I-P2 above.	Amend IB-P2 as follows: Within the coastal environment, <b>subject to Policy I-Px:</b> a. avoid adverse effects of land use and subdivision on Significant Natural Areas; and b. avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on areas of important and vulnerable indigenous vegetation, habitats and ecosystems.



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Waiaua Bay Farm Limited (S463)</b>	S463.029	Ecosystems and indigenous biodiversity	IB-P2	Oppose	<p>WBF opposes the uncertainty of subclause (b) insofar as it refers to the avoidance of effects on "...areas of important and vulnerable indigenous vegetation, habitats and ecosystems".</p> <p>Unless the composition of "important and vulnerable" is clearly quantified/stated in the Proposed Plan, the interpretation and application of this policy is unduly vague. If this is a reference to species that are the New Zealand Threat Classification List, that should be clearly expressed, and provision made for future updates to that List.</p>	Delete sub-clause b. of Objective IB-P2 or amend it to clarify the reference to "important and vulnerable" features.
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.058	Ecosystems and indigenous biodiversity	IB-P2	Oppose	<p>RMA, s75 says a district plan must give effect to the NZCPS and the RPS. This policy is a good start, however, this policy does not give full effect to the RPS, policy 4.4.1(1). And NZCPS policy 11 For example the NZCPS, policy 11(a) and the RPS, policy 4.4.1(1)(a) requires the avoidance of adverse effects on indigenous taxa that are listed as threatened or at-risk. Reliance solely on the criteria may not necessarily pick these matters up. These need to be expressly listed in the plan to give full effect to the higher order documents. Also (b) only picks up one of the matters in RPS, policy 4.4.1(2) when there actually 3. Also the NZCPS, policy 11(b) lists 6 individually. A useful comparison and perhaps template is the proposed Northland Regional Plan, policy D.2.18 or the Whangarei District Plan, CA. 1.3 (4) and . This policy mirrors the RPS, policy 4.4.1. RMA, s75(4) and (5) says a district plan must not be inconsistent with a regional plan.</p>	Amend to give full effect to RPS and the NZCPS, policy 11(a) and (b)
<b>Te Rūnanga o Ngāti Rēhia (S559)</b>	S559.020	Ecosystems and indigenous biodiversity	IB-P2	Oppose	<p>Biodiversity and its continued protection are important to Ngāti Rēhia. Our whakapapa connects us to all our native fauna and flora. It is our kaitiaki responsibility to listen to our native fauna and flora and be their voice. Māori land is usually undeveloped land,</p>	Delete IB-P2 and redraft with tangata whenua (inferred).

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					historically we were not provided the same ability to lend, receive subsidies, or grants to allow us to develop at the same way as non-Māori. This has left Māori as owners of majority of the large parcels of land that have high biodiversity values in the Far North outside of the Crown owned conversation blocks. Policy and rules should not impact our ability utilise our whenua in a way that will help us to provide social, cultural and economic prosperity for our people. The current approach to provisions is not considered to meet s6(e) of the RMA.	
<b>Scrumptious Fruit Trust (S568)</b>	S568.002	Ecosystems and indigenous biodiversity	IB-P2	Support in part		amend IB-P2 to gave an express requirement that any domestic, non indigenous animal, is generally not permitted, and if permitted , rules and by laws will promote strict direct controls - eg if dogs permitted in some foreshore areas must be on a leash
<b>Bentzen Farm Limited (S167)</b>	S167.017	Ecosystems and indigenous biodiversity	IB-P3	Oppose	Because areas of Significant Natural Area are not mapped, avoidance can only be achieved in relation to areas of significant indigenous vegetation and significant habitats of indigenous fauna. The change proposed by this submission gives effect to the requirements of the NZCPS 2010.	Amend Policy IB-P3 as follows: Outside the coastal environment: a. avoid, remedy or mitigate adverse effects of land use and subdivision on <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> to ensure adverse effects are no more than minor; and b. avoid, remedy or mitigate adverse effects of land use and subdivision on areas of important and vulnerable indigenous vegetation, habitats and ecosystems to ensure there are

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						no significant adverse effects.
<b>Setar Thirty Six Limited (S168)</b>	S168.024	Ecosystems and indigenous biodiversity	IB-P3	Oppose	Because areas of Significant Natural Area are not mapped, avoidance can only be achieved in relation to areas of significant indigenous vegetation and significant habitats of indigenous fauna. The change proposed by this submission gives effect to the requirements of the NZCPS 2010.	Amend Policy IB-P3 as follows: Outside the coastal environment: a. avoid, remedy or mitigate adverse effects of land use and subdivision on <b>Significant Natural Areas areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> to ensure adverse effects are no more than minor; and ...
<b>Wendover Two Limited (S222)</b>	S222.024	Ecosystems and indigenous biodiversity	IB-P3	Support in part	Because areas of Significant Natural Area are not mapped, avoidance can only be achieved in relation to areas of significant indigenous vegetation and significant habitats of indigenous fauna. The change proposed by this submission gives effect to the requirements of the NZCPS 2010.	Amend Policy IB-P3 as follows: Outside the coastal environment: a. avoid, remedy or mitigate adverse effects of land use and subdivision on <b>Significant Natural Areas areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> to ensure adverse effects are no more than minor; and b. avoid, remedy or mitigate adverse effects of land use and subdivision on areas of important and vulnerable indigenous vegetation, habitats and ecosystems to ensure there are no significant adverse effects.
<b>Matauri Trustee</b>	S243.026	Ecosystems and	IB-P3	Oppose	Because areas of Significant Natural Area are not mapped, avoidance can only be achieved in relation to areas of significant	Amend Policy IB-P3 as follows: Outside the coastal environment: a. avoid, remedy or mitigate adverse

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Limited (S243)		indigenous biodiversity			indigenous vegetation and significant habitats of indigenous fauna. The change proposed by this submission gives effect to the requirements of the NZCPS 2010.	effects of land use and subdivision on <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> to ensure adverse effects are no more than minor; and b. avoid, remedy or mitigate adverse effects of land use and subdivision on areas of important and vulnerable indigenous vegetation, habitats and ecosystems to ensure there are no significant adverse effects.
Russell Landcare Trust (S276)	S276.109	Ecosystems and indigenous biodiversity	IB-P3	Support	Policy 4.4.1(1) of the Regional Policy Statement sets a 'no more than minor' effects regime for SNAs outside the coastal environment. The District Plan test should be consistent for such areas.	Retain policy IB-P3 which sets a 'no more than minor' effects regime for SNAs outside the coastal environment (inferred).
Waka Kotahi NZ Transport Agency (S356)	S356.064	Ecosystems and indigenous biodiversity	IB-P3	Oppose	There is slight confusion and duplication in relation to IP-03 and this needs to be clarified to ensure these provisions complement and work together.	Amend as follows: Outside the coastal environment: a. avoid, remedy or mitigate adverse effects of land use and subdivision on <b>the qualities and characteristics</b> of Significant Natural Areas to ensure adverse effects are no more than minor; and b. avoid, remedy or mitigate adverse effects of land use and subdivision on areas of important and vulnerable indigenous vegetation, habitats and ecosystems to ensure there are no significant adverse effects;

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<b>and</b> <b>c. In relation to infrastructure, Policy IP3 also applies.</b>
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.038	Ecosystems and indigenous biodiversity	IB-P3	Support in part	The Director-General supports the intention of Policy IB-P3, however requests an amendment to recognise and provide for the matters of national importance under section 6(c) of the RMA and to give effect to the RPS for Northland.	Amend Policy IB-P3 as follows:  Outside the coastal environment: a. avoid, <del>remedy or mitigate</del> significant adverse effects of land use and subdivision on Significant Natural Areas <del>to ensure adverse effects are no more than minor;</del> and  b. avoid, remedy or mitigate adverse effects of land use and subdivision on areas of important and vulnerable indigenous vegetation, habitats and ecosystems to ensure there are no significant adverse effects.
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.059	Ecosystems and indigenous biodiversity	IB-P3	Not Stated	Policy IB-3 as written does not specifically provide for threatened and at risk species of flora and fauna. These species are most at risk of adverse effects.	Amend Policy IB-P3 as follows: Outside the coastal environment: a) avoid, remedy or mitigate adverse effects of land use and subdivision on Significant Natural Areas <b>and threatened and at risk indigenous species</b> to ensure adverse effects are no more than minor; and b) avoid, remedy or mitigate

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						adverse effects of land use and subdivision on areas of important <del>and vulnerable</del> indigenous vegetation, habitats and ecosystems to ensure there are no significant adverse effects.
<b>John Andrew Riddell (S431)</b>	S431.092	Ecosystems and indigenous biodiversity	IB-P3	Not Stated	Protection of indigenous biodiversity is a component of sustainable management of natural and physical resources via, for example sections 5(2)(b) and 6(c) of the Act. Further directive guidance on the protection and enhancement of indigenous biodiversity is given by policy 11 of the Coastal Policy Statement and policy 4.4.1 of the Regional Policy Statement. The proposed Plan does not give effect to these policies.	Delete Policies IB-P1, IB-P2 and IB-P3 and replace with a reproduced Policy 4.4.1 of the Regional Policy Statement.
<b>Kapiro Conservation Trust (S442)</b>	S442.078	Ecosystems and indigenous biodiversity	IB-P3	Oppose	Many of the reasons listed for IB-P2 apply to this policy in regards to giving effect to the RPS, policy 4.4.1. This policy only partially gives effect to the RPS. A useful comparison and perhaps template is the proposed Northland Regional Plan, policy D.2.18. This policy mirrors the RPS, policy 4.4.1. RMA, s75(4) says a district plan must not be inconsistent with a regional plan.	Amend to give full effect to the RPS. Policy 4.4.1 for indigenous biodiversity outside of the coastal environment.
<b>Transpower New Zealand Ltd (S454)</b>	S454.084	Ecosystems and indigenous biodiversity	IB-P3	Not Stated	A consequential amendment to this policy is required to ensure that the FNPDP gives effect to the NPSET as set out in the submission point on I-P2 above.	Amend IB-P3 as follows: Outside the coastal environment, <b>subject to Policy I-Px:</b> a. avoid, remedy or mitigate adverse effects of land use and subdivision on Significant Natural Areas to ensure adverse effects are no more than minor; and b. avoid, remedy or mitigate adverse effects of land use and subdivision on areas of important

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						and vulnerable indigenous vegetation, habitats and ecosystems to ensure there are no significant adverse effects.
<b>Waiaua Bay Farm Limited (S463)</b>	S463.030	Ecosystems and indigenous biodiversity	IB-P3	Oppose	WBF opposes the vague wording of sub-clause (b) of this policy for the same reasons given in relation to policy IB-P2.	Delete sub-clause b. of Policy IB-P3 or amend it to clarify the reference to "important and vulnerable" features
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.059	Ecosystems and indigenous biodiversity	IB-P3	Oppose	Many of the reasons listed for IB-P2 apply to this policy in regards to giving effect to the RPS, policy 4.4.1. This policy only partially gives effect to the RPS. A useful comparison and perhaps template is the proposed Northland Regional Plan, policy D.2.18. This policy mirrors the RPS, policy 4.4.1. RMA, s75(4) says a district plan must not be inconsistent with a regional plan.	Amend to give full effect to the RPS. Policy 4.4.1 for indigenous biodiversity outside of the coastal environment.
<b>Te Rūnanga o Ngāti Rēhia (S559)</b>	S559.021	Ecosystems and indigenous biodiversity	IB-P3	Oppose	Biodiversity and its continued protection are important to Ngāti Rēhia. Our whakapapa connects us to all our native fauna and flora. It is our kaitiaki responsibility to listen to our native fauna and flora and be their voice. Māori land is usually undeveloped land, historically we were not provided the same ability to lend, receive subsidies, or grants to allow us to develop at the same way as non-Māori. This has left Māori as owners of majority of the large parcels of land that have high biodiversity values in the Far North outside of the Crown owned conversation blocks. Policy and rules should not impact our ability utilise our whenua in a way that will help us to provide social, cultural and economic prosperity for our people. The current approach to provisions is not considered to meet s6(e) of the RMA.	Delete IB-P3 and redraft with tangata whenua (inferred).
<b>Lynley Newport (S129)</b>	S129.001	Ecosystems and indigenous biodiversity	IB-P4	Support in part	The submitter supports IB-P4 and the ability to offsets but considers that offsetting should also be available in the coastal environment.	Amend IB-P4 to read: If adverse effects on indigenous species, habitats cannot be avoided, remedied or mitigated in accordance

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						with IB-P2 and/or P3, consider whether it is appropriate to apply the following steps as an effects management hierarchy: (remainder unchanged)
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.039	Ecosystems and indigenous biodiversity	IB-P4	Support in part	The Director General supports the intention of Policy IB-P4, however requests amendments to ensure the policy incorporates the principles of the NPSIB exposure draft.	Amend Policy IB-P4 to require that any biodiversity offset, or biodiversity compensation be in accordance with the principles of Appendices 3 and 4 of NPSIB (or like principles). Insert Appendices 3 and 4 of NPSIB (or like principles) into the Plan
<b>KiwiRail Holdings Limited (S416)</b>	S416.031	Ecosystems and indigenous biodiversity	IB-P4	Support	KiwiRail have an interest in these provisions and support the policy direction setting out the hierarchy of avoid, remedy, mitigation and offsetting in relation to environmental effects in sensitive areas.	Retain Policy IB-P4
<b>Kapiro Conservation Trust (S442)</b>	S442.079	Ecosystems and indigenous biodiversity	IB-P4	Neutral	Forest & Bird tentatively supports this policy but wishes to see where discussions on other policies land.	Retain IB-P4.
<b>Kapiro Conservation Trust (S442)</b>	S442.176	Ecosystems and indigenous biodiversity	IB-P4	Support in part	Offsetting and compensation should only be available where there will be a net gain in indigenous biodiversity and it should not be seen as being available for consideration as of right Support definitions of biodiversity offsetting and compensation subject to amendments needed to reflect need for net gain in indigenous biodiversity>	Amend (a) to require a net gain in indigenous biodiversity; and Amend (b) to reflect the need for compensation up to a net gain; and Amend definitions of biodiversity offsetting and biodiversity compensation to reflect need for net gain.
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.060	Ecosystems and indigenous biodiversity	IB-P4	Neutral	Forest & Bird tentatively supports this policy but wishes to see where discussions on other policies land	Retain IB-P4



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<b>Marianna Fenn (S542)</b>	S542.006	Ecosystems and indigenous biodiversity	IB-P4	Support in part	Offsetting and compensation should only be available where there will be a net gain in indigenous biodiversity and it should not be seen as being available for consideration as of right Support definitions of biodiversity offsetting and compensation subject to amendments needed to reflect need for net gain in indigenous biodiversity	Amend (a) to require a net gain in indigenous biodiversity; and Amend (b) to reflect the need for compensation up to a net gain; and Amend definitions of biodiversity offsetting and biodiversity compensation to reflect need for net gain
<b>PF Olsen Limited (S91)</b>	S91.005	Ecosystems and indigenous biodiversity	IB-P5	Support	Policy supported	Retain Policy IB-P5
<b>Ballance Agri-Nutrients Limited (S143)</b>	S143.005	Ecosystems and indigenous biodiversity	IB-P5	Support	Ballance supports policies that do not impose unreasonable restrictions on existing primary production activities	Retain the policy IB-P5
<b>Summit Forests New Zealand Limited (S148)</b>	S148.014	Ecosystems and indigenous biodiversity	IB-P5	Support	SFNZ acknowledges the statements made regarding the high proportion of the District that has potentially significant ecological values and the fact that over half of those lands are in private ownership. As noted, this creates potential tension between those seeking to protect those areas and those wishing to make reasonable economic use of their lands. It is essential that the Plan takes a pragmatic approach to protecting significant natural areas and allowing people to meet their social, economic, and cultural wellbeing by: <ul style="list-style-type: none"> <li>- Ensuring there is certainty about what is or is not an SNA including drawing clear boundaries between rural production areas and SNA and ensuring there is reliable mapping of SNA across the district.</li> <li>- Supporting landowners with the costs of identifying and managing SNA on their lands</li> <li>- Avoiding unnecessary compliance costs associated with potential SNA and rural production activities.</li> </ul>	Retain IB-P5

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Horticulture New Zealand (S159)</b>	S159.051	Ecosystems and indigenous biodiversity	IB-P5	Support in part	Recognition of primary production and highly versatile soils is supported. However, the defined term is highly productive land which should be used in the policy	Amend section a) of Policy IB-P5, replacing the term 'highly versatile soils' with 'highly productive land'.
<b>Bentzen Farm Limited (S167)</b>	S167.018	Ecosystems and indigenous biodiversity	IB-P5	Oppose	Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas. Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.	Amend Policy IB-P5 as follows: Ensure that the management of land use and subdivision to protect <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> and maintain indigenous biodiversity is done in a way that: a. does not impose unreasonable restrictions on existing primary production activities, particularly on highly versatile soils; b. recognises the operational need and functional need of some activities, including regionally significant infrastructure, to be located within <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> in some circumstances; c. allows for maintenance, use and operation of existing structures, including infrastructure; and d. enables Māori land to be used and developed to support the

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						social, economic and cultural well-being of tangata whenua, including the provision of papakāinga, marae and associated residential units and infrastructure.
Setar Thirty Six Limited (S168)	S168.025	Ecosystems and indigenous biodiversity	IB-P5	Oppose	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <ol style="list-style-type: none"> <li>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</li> <li>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</li> </ol> <p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas.</p> <p>Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.</p>	<p>Amend Policy IB-P5 as follows: Ensure that the management of land use and subdivision to protect <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> and maintain indigenous biodiversity is done in a way that:</p> <ol style="list-style-type: none"> <li>a. does not impose unreasonable restrictions on existing primary production activities, particularly on highly versatile soils;</li> <li>b. recognises the operational need and functional need of some activities, including regionally significant infrastructure, to be located within <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> in some circumstances; ...</li> </ol>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>NZ Agricultural Aviation Association (S182)</b>	S182.014	Ecosystems and indigenous biodiversity	IB-P5	Support	Support policies that do not impose unreasonable restrictions on existing primary production activities	Retain Policy IB-P5
<b>The Shooting Box Limited (S187)</b>	S187.018	Ecosystems and indigenous biodiversity	IB-P5	Oppose	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <ol style="list-style-type: none"> <li>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</li> <li>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</li> </ol> <p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas.</p> <p>Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.</p>	<p>Amend Policy IB-P5 as follows: Ensure that the management of land use and subdivision to protect <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> and maintain indigenous biodiversity is done in a way that:</p> <ol style="list-style-type: none"> <li>a. does not impose unreasonable restrictions on existing primary production activities, particularly on highly versatile soils</li> <li>b. recognises the operational need and functional need of some activities, including regionally significant infrastructure, to be located within <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> in some circumstances;</li> <li>c. allows for maintenance, use and operation of existing structures, including infrastructure; and</li> <li>d. enables Māori land to be used and developed in support the</li> </ol>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						social, economic and cultural well-being of tangata associated residential units and infrastructure.
<b>Wendover Two Limited (S222)</b>	S222.025	Ecosystems and indigenous biodiversity	IB-P5	Support in part	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <ol style="list-style-type: none"> <li>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</li> <li>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</li> </ol> <p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas.</p> <p>Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.</p>	<p>Amend Policy IB-P5 as follows: Ensure that the management of land use and subdivision to protect <b>Significant Natural Areas areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> and maintain indigenous biodiversity is done in a way that:</p> <ol style="list-style-type: none"> <li>a. does not impose unreasonable restrictions on existing primary production activities, particularly on highly versatile soils;</li> <li>b. recognises the operational need and functional need of some activities, including regionally significant infrastructure, to be located within <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> in some circumstances;</li> <li>c. allows for maintenance, use and operation of existing structures, including infrastructure; and</li> </ol>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>d. enables Māori land to be used and developed to support the social, economic and cultural well-being of tangata whenua, including the provision of papakāinga, marae and associated residential units and infrastructure.</p>
<p><b>Matauri Trustee Limited (S243)</b></p>	<p>S243.027</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-P5</p>	<p>Oppose</p>	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <ol style="list-style-type: none"> <li>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</li> <li>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</li> </ol> <p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas. Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.</p>	<p>Amend Policy IB-P5 as follows: Ensure that the management of land use and subdivision to protect <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> and maintain indigenous biodiversity is done in a way that:</p> <ol style="list-style-type: none"> <li>a. does not impose unreasonable restrictions on existing primary production activities, particularly on highly versatile soils;</li> <li>b. recognises the operational need and functional need of some activities, including regionally significant infrastructure, to be located within <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> in some circumstances;</li> <li>c. allows for maintenance, use</li> </ol>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						and operation of existing structures, including infrastructure; and d. enables Māori land to be used and developed to support the social, economic and cultural well-being of tangata whenua, including the provision of papakāinga, marae and associated residential units and infrastructure.
<b>Russell Landcare Trust (S276)</b>	S276.006	Ecosystems and indigenous biodiversity	IB-P5	Support in part	Protection and recognition of indigenous biodiversity is inadequate and the rules do not prevent incremental loss.	Amend clause B of Policy IB-P5 so that it sets the policy test for restrictions on primary production as whether they are necessary for protection and enhancement of indigenous biodiversity.
<b>Chorus New Zealand Limited, Spark New Zealand Trading Limited, Spark TowerCo Limited, Vodafone New Zealand Limited (S282)</b>	S282.012	Ecosystems and indigenous biodiversity	IB-P5	Support	This policy recognises the importance as well as operational and function needs of regionally significant infrastructure at a policy level and allows for the location of such within Significant Natural Areas in some circumstances.	Retain IB-P5.
<b>Ministry of Education Te Tāhuhu o Te Mātauranga (S331)</b>	S331.043	Ecosystems and indigenous biodiversity	IB-P5	Support	The submitter supports policy IB-P5 as it acknowledges the Ministry may have an operational need to provide educational facilities for existing communities in Significant Natural Areas.	Retain policy IB-P5, as proposed.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<p><b>P S Yates Family Trust (S333)</b></p>	<p>S333.017</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-P5</p>	<p>Support in part</p>	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <ol style="list-style-type: none"> <li>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</li> <li>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</li> </ol> <p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas.</p> <p>Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.</p>	<p>Amend Policy IB-P5 as follows: Ensure that the management of land use and subdivision to protect <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> and maintain indigenous biodiversity is done in a way that:</p> <ol style="list-style-type: none"> <li>a. does not impose unreasonable restrictions on existing primary production activities, particularly on highly versatile soils;</li> <li>b. recognises the operational need and functional need of some activities, including regionally significant infrastructure, to be located within <del>Significant Natural Areas</del> <b>areas of significant indigenous vegetation and significant habitats of indigenous fauna</b> in some circumstances;</li> <li>c. allows for maintenance, use and operation of existing structures, including infrastructure; and</li> <li>d. enables Māori land to be used and developed to support the social, economic and cultural well-being of tangata whenua, including the provision of papakāinga, marae and</li> </ol>



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						associated residential units and infrastructure.
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.062	Ecosystems and indigenous biodiversity	IB-P5	Support	not stated	Retain IB-P5 as notified
<b>Director-General of Conservation (Department of Conservation) (S364)</b>	S364.040	Ecosystems and indigenous biodiversity	IB-P5	Support in part	The Director-General considers that Policy IB-P5 should be amended to ensure that land use and subdivision in relation to SNAs is managed in an appropriate way. It is unclear what circumstances would meet the criteria for "unreasonable restriction". It is further considered that the "operational need" of "some activities" should not have a higher priority than SNAs.	Amend Policy IB-P5 as follows: Ensure that the management of land use and subdivision to protect Significant Natural Areas and maintain indigenous biodiversity is done in a way that: <del>a. does not impose unreasonable restrictions on existing primary production activities, particularly on highly versatile soils;</del> b. recognises the <del>operational need</del> and functional need of <del>some</del> activities, including regionally significant infrastructure, to be located within Significant Natural Areas in some circumstances; c. allows for maintenance, use and operation of existing structures, including infrastructure; and d. enables Māori land to be used and developed to support the social, economic and cultural well-being of tangata whenua, including the provision of papakāinga, marae and associated residential units and

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						infrastructure.
<b>KiwiRail Holdings Limited (S416)</b>	S416.032	Ecosystems and indigenous biodiversity	IB-P5	Support	The recognition that there are sometimes operation and functional needs for buildings and structures to be located in SNA's (and in other scheduled areas), is supported by KiwiRail. As previously noted, the rail corridor is not able to be easily relocated given its nature as a long linear transport network.	Retain Policy IB-P5
<b>John Andrew Riddell (S431)</b>	S431.102	Ecosystems and indigenous biodiversity	IB-P5	Not Stated	The permitted activity rules applying to ecosystems and indigenous biodiversity are too permissive and do not achieve the purpose of the Act.	Amend clause b of policy IB-P5 so that it sets the policy test for restrictions on primary production as whether they are necessary for protection and enhancement of indigenous biodiversity
<b>Kapiro Conservation Trust (S442)</b>	S442.080	Ecosystems and indigenous biodiversity	IB-P5	Oppose	<p>This policy is trying to do too much. It is combining the protection of SNAs elements with maintenance of other indigenous biodiversity into one policy direction.</p> <p>Sub policy (a) - Existing primary production areas are already cleared or highly modified so shouldn't generally be captured by the RPS SNA definition. The maintenance of biodiversity will likely be the only provisions applying. The wording of this sub-policy does not align with the wording of the other three sub-policies and gives primary production activities primacy over the protection and maintenance of indigenous biodiversity. There are no higher document directions indicating this should be the case. ALSO the term "unreasonable" is far too ambiguous. The sub-policy if it remains requires tightening up. Sub-Policy (b) and (c) are already provided for in the infrastructure and renewable energy chapters. It also gives all infrastructure primacy over indigenous biodiversity when there is no higher order</p>	<p>Delete in the first instance, if not deleted then amend as follows:  "Ensure that the management of land use, <b>development</b> and subdivision to protect Significant Natural Areas and maintain indigenous biodiversity is done in a way that:  a) <del>Does not impose unreasonable restrictions on</del> <b>Allows for</b> existing primary production activities, to continue particularly on highly versatile soils where the Significant Natural Areas's values are protected and indigenous biodiversity values are maintained;  ...</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					direction for this Sub-policy (d) could be retained in a separate format.	
<b>Kapiro Conservation Trust (S442)</b>	S442.177	Ecosystems and indigenous biodiversity	IB-P5	Oppose	Query how "unreasonable" will be determined for the purposes of (a). There is increasing awareness and support for the need to transform and improve practices in our agricultural sector. What might have been seen as "unreasonable" in the past may now be a minimum for being able to continue to operate. The wording of this policy may assist in holding back required progress The current definition of "normal farming practices" has been used to avoid prosecution for disturbance of ephemeral wetlands.	Amend (a) to <del>Does not impose unreasonable restrictions on</del> <b>Allows for existing primary production activities, to continue particularly on highly versatile soils provided that Significant Natural Areas are protected and indigenous biodiversity values of the site are maintained;</b> and Amend "farming" definition to exclude significant earthworks.
<b>Transpower New Zealand Ltd (S454)</b>	S454.085	Ecosystems and indigenous biodiversity	IB-P5	Not Stated	A consequential amendment to this policy is required to ensure that the FNPDP gives effect to the NPSET as set out in the submission point on I-P2 above.	Amend IB-P5 as follows: Ensure that the management of land use and subdivision to protect Significant Natural Areas and maintain indigenous biodiversity, <b>subject to Policy I-Px</b> , is done in a way that:
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.061	Ecosystems and indigenous biodiversity	IB-P5	Oppose	This policy is trying to do too much. It is combining the protection of SNAs elements with maintenance of other indigenous biodiversity into one policy direction. Sub policy (a) - Existing primary production areas are already cleared or highly modified so shouldn't generally be captured by the RPS SNA definition. The maintenance of biodiversity will likely be the only provisions applying. The wording of this sub-policy does not align with the wording of the other three sub-policies and gives primary production activities primacy over the protection and maintenance of indigenous biodiversity. There are no higher document directions indicating this should be the case. Also the	Delete IB-P5 if not deleted then Amend as follows Ensure that the management of land use, <b>development</b> and subdivision to protect Significant Natural Areas and maintain indigenous biodiversity is done in a way that: a) <del>Does not impose unreasonable restrictions on</del> <b>Allows for</b> existing primary production activities, to continue <del>particularly on highly versatile</del>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					term "unreasonable" is far too ambiguous. The sub-policy if it remains requires tightening up. Sub-Policy (b) and (c) are already provided for in the infrastructure and renewable energy chapters. It also gives all infrastructure primacy over indigenous biodiversity when there is no higher order direction for this Sub-policy (d) could be retained in a separate format	<del>soils</del> where the Significant Natural Areas's values are protected and indigenous biodiversity values are maintained;
<b>Marianna Fenn (S542)</b>	S542.007	Ecosystems and indigenous biodiversity	IB-P5	Oppose	Query how "unreasonable" will be determined for the purposes of (a). There is increasing awareness and support for the need to transform and improve practices in our agricultural sector. What might have been seen as "unreasonable" in the past may now be a minimum for being able to continue to operate. The wording of this policy may assist in holding back required progress The current definition of "normal farming practices" has been used to avoid prosecution for disturbance of ephemeral wetlands	Amend (a) to <del>Does not impose unreasonable restrictions on</del> <b>Allows for existing primary production activities, to continue particularly on highly versatile soils provided that Significant Natural Areas are protected and indigenous biodiversity values of the site are maintained;</b> and Amend "farming" definition to exclude significant earthworks
<b>Te Rūnanga o Ngāti Rēhia (S559)</b>	S559.022	Ecosystems and indigenous biodiversity	IB-P5	Oppose	Biodiversity and its continued protection are important to Ngāti Rēhia. Our whakapapa connects us to all our native fauna and flora. It is our kaitiaki responsibility to listen to our native fauna and flora and be their voice. Māori land is usually undeveloped land, historically we were not provided the same ability to lend, receive subsidies, or grants to allow us to develop at the same way as non-Māori. This has left Māori as owners of majority of the large parcels of land that have high biodiversity values in the Far North outside of the Crown owned conversation blocks. Policy and rules should not impact our ability utilise our whenua in a way that will help us to provide social, cultural and economic prosperity for our people. The current approach to	Delete IB-P5 and redraft with tangata whenua (inferred).

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					provisions is not considered to meet s6(e) of the RMA.	
<b>PF Olsen Limited (S91)</b>	S91.006	Ecosystems and indigenous biodiversity	IB-P6	Support	Policy supported	Retain Policy IB-P6
<b>Lynley Newport (S128)</b>	S128.002	Ecosystems and indigenous biodiversity	IB-P6	Support in part	<p>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.</p> <p>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.</p>	Amend Policy IB-P6 by making it IB-PI and by deleting the word "consideration of" from the preamble and simply saying:"... through the following non-regulatory methods:". In summary, to be reworded as follows: <i>Encourage the protection, maintenance and restoration of indigenous biodiversity, with priority given to Significant Natural Areas, through the following non-regulatory methods including consideration of ...</i>
<b>Summit Forests New Zealand Limited (S148)</b>	S148.015	Ecosystems and indigenous biodiversity	IB-P6	Support	SFNZ acknowledges the statements made regarding the high proportion of the District that has potentially significant ecological values and the fact that over half of those lands are in private ownership. As noted, this creates potential tension between those seeking to protect those areas and those wishing to make reasonable economic use of their lands. It is essential that the Plan takes a pragmatic approach to protecting significant natural areas and allowing people to meet their social, economic, and cultural wellbeing by:	Retain IB-P6

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<ul style="list-style-type: none"> <li>- Ensuring there is certainty about what is or is not an SNA including drawing clear boundaries between rural production areas and SNA and ensuring there is reliable mapping of SNA across the district.</li> <li>- Supporting landowners with the costs of identifying and managing SNA on their lands</li> <li>- Avoiding unnecessary compliance costs associated with potential SNA and rural production activities.</li> </ul>	
<p><b>Bentzen Farm Limited (S167)</b></p>	<p>S167.019</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-P6</p>	<p>Support in part</p>	<p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas. Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied. An amendment is sought to provide a policy basis for rule SUB-R6 Environmental benefit subdivision and SUB-R7 Management plan subdivision.</p> <p>This outcome gives effect to objective 3.4 and policy 4.4.2 of the Regional Policy Statement for Northland.</p>	<p>Amend Policy IB-P6 as follows:  Encourage the protection, maintenance and restoration of indigenous biodiversity, <del>with priority given to Significant Natural Areas,</del> through <b>both regulatory and non-regulatory methods</b> including consideration of:  <del>a. assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a Significant Natural Area;</del>  <b>a. Enabling subdivision and land use where that results in the restoration or enhancement of indigenous biodiversity, including under-represented ecosystems, and where biodiversity is increased and legally protected.</b>  b. reducing or waiving resource consent application fees;  c. providing, or assisting in obtaining funding from other agencies and trusts;</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>d. sharing and helping to improve information on indigenous biodiversity; and</p> <p>e. working directly with iwi and hapū, landowners and community groups on ecological protection and enhancement projects.</p>
<p><b>Setar Thirty Six Limited (S168)</b></p>	<p>S168.026</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-P6</p>	<p>Support in part</p>	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <ol style="list-style-type: none"> <li>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</li> <li>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</li> </ol> <p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas.</p> <p>Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied. In addition, an amendment is sought to provide a policy basis for rule SUB-R6 Environmental benefit subdivision and SUB-R7 Management plan subdivision.</p> <p>This outcome gives effect to objective 3.4 and policy 4.4.2 of the Regional Policy Statement for Northland.</p>	<p>Amend Policy IB-P6 as follows: Encourage the protection, maintenance and restoration of indigenous biodiversity, <del>with priority given to Significant Natural Areas,</del> through <b>both regulatory and non-regulatory</b> methods including consideration of:</p> <ol style="list-style-type: none"> <li>a. <del>assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a Significant Natural Area;</del></li> <li>a. <b>Enabling subdivision and land use where that results in the restoration or enhancement of indigenous biodiversity, including under-represented ecosystems, and where biodiversity is increased and legally protected...</b></li> </ol>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>The RPS recognises at 4.4.3 that "ecologically beneficial use and development and voluntary efforts can be actively encouraged by including appropriate rules and incentives in regional and district plans".</p> <p>Subdivision is one such incentive - providing the necessary capital injection to enact the land use change required and establishing a community of care, and on-going obligations in respect to biodiversity.</p>	
<p><b>The Shooting Box Limited (S187)</b></p>	<p>S187.019</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-P6</p>	<p>Support in part</p>	<p>Refer to submission for detailed reasons for decision requested relating, but not limited to, the following: reasons provided in the Ecosystems and Indigenous Biodiversity overview section; the outcome gives effect to Objective 3.4 and 4.4.2 of the Regional Policy Statement; and how subdivision provides necessary capital injection for on-going obligations in respect to biodiversity.</p>	<p>Amend Policy IB-P6 as follows:  Encourage the protection, maintenance and restoration of indigenous biodiversity, <del>with priority given to Significant Natural Areas,</del> through <b>both regulatory and non-regulatory methods</b> including consideration of:  <del>a. assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a Significant Natural Area;</del>  <b>a. Enabling subdivision and land use where that results in the restoration or enhancement of indigenous biodiversity, including under-represented ecosystems, and where biodiversity is increased and legally protected.</b>  b. reducing or waiving resource consent application fees;  c. providing, or assisting in obtaining funding from other</p>



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>agencies and trusts.</p> <p>d. sharing and helping to improve information on indigenous biodiversity; and</p> <p>e. working directly with iwi and hapū, landowners and community groups on ecological protection and enhancement projects.</p>
<p><b>Thomson Survey Ltd (S192)</b></p>	<p>S192.002</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-P6</p>	<p>Support in part</p>	<p>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.</p> <p>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).</p> <p>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</p>	<p>Amend IB-P6 by making it IB-PI and by deleting the word "<del>consideration of</del>" from the preamble and simply saying: "... <b>through the following non-regulatory methods:</b>"</p>

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					<p>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-PI. 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?</p> <p>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.</p>	
<p><b>Wendover Two Limited (S222)</b></p>	<p>S222.026</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-P6</p>	<p>Support in part</p>	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <ol style="list-style-type: none"> <li>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</li> <li>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</li> </ol> <p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or</p>	<p>Amend Policy IB-P6 as follows: Encourage the protection, maintenance and restoration of indigenous biodiversity, <del>with priority given to Significant Natural Areas,</del> through <b>both regulatory and non-regulatory</b> methods including consideration of:  <del>a. assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a Significant Natural Area;</del>  <b>a. Enabling subdivision and land use where</b></p>

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					<p>effective methods to protect such areas.</p> <p>Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.</p> <p>In addition, an amendment is sought to provide a policy basis for rule SUB-R6 Environmental benefit subdivision and SUB-R7 Management plan subdivision. This outcome gives effect to objective 3.4 and policy 4.4.2 of the Regional Policy Statement for Northland. The RPS recognises at 4.4.3 that "ecologically beneficial use and development and voluntary efforts can be actively encouraged by including appropriate rules and incentives in regional and district plans". Subdivision is one such incentive - providing the necessary capital injection to enact the land use change required and establishing a community of care, and on-going obligations in respect to biodiversity.</p>	<p><b>that results in the restoration or enhancement of indigenous biodiversity, including under-represented ecosystems, and where biodiversity is increased and legally protected.</b></p> <p>b. reducing or waiving resource consent application fees;</p> <p>c. providing, or assisting in obtaining funding from other agencies and trusts;</p> <p>d. sharing and helping to improve information on indigenous biodiversity; and</p> <p>e. working directly with iwi and hapū, landowners and community groups on ecological protection and enhancement projects.</p>
<p><b>Matauri Trustee Limited (S243)</b></p>	<p>S243.028</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-P6</p>	<p>Oppose</p>	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <ol style="list-style-type: none"> <li>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</li> <li>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</li> </ol> <p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or</p>	<p>Amend Policy IB-P6 as follows: Encourage the protection, maintenance and restoration of indigenous biodiversity, <del>with priority given to Significant Natural Areas,</del> through <b>both regulatory and non-regulatory methods</b> including consideration of:</p> <ol style="list-style-type: none"> <li>a. <del>assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a Significant Natural Area;</del></li> </ol>

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					<p>effective methods to protect such areas. Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied. In addition, an amendment is sought to provide a policy basis for rule SUB-R6 Environmental benefit subdivision and SUB-R7 Management plan subdivision. This outcome gives effect to objective 3.4 and policy 4.4.2 of the Regional Policy Statement for Northland.</p> <p>The RPS recognises at 4.4.3 that "ecologically beneficial use and development and voluntary efforts can be actively encouraged by including appropriate rules and incentives in regional and district plans". Subdivision is one such incentive - providing the necessary capital injection to enact the land use change required and establishing a community of care, and on-going obligations in respect to biodiversity.</p>	<p>a. <b>Enabling subdivision and land use where that results in the restoration or enhancement of indigenous biodiversity, including under-represented ecosystems, and where biodiversity is increased and legally protected.</b></p> <p>b. reducing or waiving resource consent application fees;</p> <p>c. providing, or assisting in obtaining funding from other agencies and trusts;</p> <p>d. sharing and helping to improve information on indigenous biodiversity; and</p> <p>e. working directly with iwi and hapū, landowners and community groups on ecological protection and enhancement projects.</p>
<p><b>Nicole Wooster (S259)</b></p>	<p>S259.004</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-P6</p>	<p>Support in part</p>	<p>IB-P7 refers to 'support' while IB-P6 is not that clear. To get these outcomes support is required and should be provided as it's a community/country benefit at the cost of the landowner as they lose the ability for any other land use in most instances, especially in the coastal environment. The individual landowner does not benefit as under other government regulations most of this vegetation would not qualify for carbon credits or emission offsets due to the vegetation age and the way the emission scheme is being proposed. It also means that unlike land that has been extensively</p>	<p>Amend wording to include 'support' in the first part and council to provide financial aid to actively manage large protected areas due to the community benefit.</p>

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					<p>farmed it can be planted to obtain carbon credits, while an SNA for example would not be allowed to be cleared to benefit from this new activity which may be the only financially viable option for marginal farm operations with reducing profits, uncertainty over future meat demand and greater regulations. Support should also be in the form of financial aid due to the community benefit, e.g an ecological fund, or help from an ecologist. Compensation in the form of support is important as reasonable use of the land no longer exists if vegetation cannot be removed and applies for large areas of your property.</p>	
<p><b>P S Yates Family Trust (S333)</b></p>	<p>S333.018</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-P6</p>	<p>Support in part</p>	<p>As above in the reasons for the changes to the Overview section. In addition, an amendment is sought to provide a policy basis for rule SUB-R6 Environmental benefit subdivision and SUB-R7 Management plan subdivision. This outcome gives effect to objective 3.4 and policy 4.4.2 of the Regional Policy Statement for Northland. The RPS recognises at 4.4.3 that "ecologically beneficial use and development and voluntary efforts can be actively encouraged by including appropriate rules and incentives in regional and district plans". Subdivision is one such incentive - providing the necessary capital injection to enact the land use change required and establishing a community of care, and on-going obligations in respect to biodiversity.</p>	<p>Amend Policy IB-P6 as follows: Encourage the protection, maintenance and restoration of indigenous biodiversity, <del>with priority given to Significant Natural Areas,</del> through <b>both regulatory and non-regulatory</b> methods including consideration of: <del>a. assisting landowners with physical assessments by suitably qualified ecologists to determine whether an area is a Significant Natural Area;</del> <b>a. Enabling subdivision and land use where that results in the restoration or enhancement of indigenous biodiversity, including under-represented ecosystems, and where biodiversity is increased and legally protected.</b> b. reducing or waiving resource consent application fees;</p>

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						<p>c. providing, or assisting in obtaining funding from other agencies and trusts;</p> <p>d. sharing and helping to improve information on indigenous biodiversity; and</p> <p>e. working directly with iwi and hapū, landowners and community groups on ecological protection and enhancement projects.</p>
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.041	Ecosystems and indigenous biodiversity	IB-P6	Support in part	<p>The Director-General supports the intention of Policy IB-P6, however, the current wording of the policy is considered limiting. Both "Threatened" and "At Risk" species should be captured under this policy in line with the New Zealand Threat Classification System (2007).</p> <p>Lists of "Threatened" and "At Risk" species in the Far North also include plants that would not be affected by the presence of cats, dogs and mustelids. The term 'fauna' more appropriately recognises the intent of this policy.</p>	<p>Amend Policy IB-P6 as follows: Require landowners to manage pets and pest species, including dogs, cats, possums, rats and mustelids, to avoid risks to <del>threatened</del> <b>indigenous species At Risk or Threatened indigenous fauna</b>, including avoiding the introduction of pets and pest species into kiwi present or high-density kiwi areas.</p>
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.060	Ecosystems and indigenous biodiversity	IB-P6	Not Stated	<p>Priority should be given to the most rare ecosystem/habitat types. In general terms this includes coastal ecosystems and lowland ecosystems (the "lowest, flattest, warmest and driest" environments Cieraad et al 2015). Not all Significant Natural Areas include ecosystems of these types. Given that the amount of indigenous habitat across the district is large and apparently increasing (based on a comparison of the 2000 and 2020 SNA maps) and that the protection of SNAs has been controversial,</p>	<p>Amend Policy IB-P6 as follows: Encourage the protection, maintenance and restoration of indigenous biodiversity, with priority given to Significant Natural Areas <b>in lowland or coastal areas</b>, through non-regulatory methods including consideration of: a) assisting landowners with physical assessments by suitably</p>

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					we suggest Council consider undertaking or commissioning a district wide analysis of the SNA areas and other habitats already identified using publicly available databases in order to identify which types are already well protected and develop appropriate district wide priorities and protection targets which could allow development of some (generally well protected or common) SNAs (particularly on Māori land) whilst ensuring a representative and appropriate reserve network of ecosystem types across the District to protect and maintain the districts indigenous biodiversity.	qualified ecologists to determine whether an area is a <b>high priority</b> Significant Natural Area; ...
<b>Northland Fish and Game Council (S436)</b>	S436.033	Ecosystems and indigenous biodiversity	IB-P6	Support	For the reasons set out under 'general submissions 'wetlands'' of the submission (refer to submission points S436.001 and S436.002), NFGC strongly support Policy IB-P6 - especially in regards to reducing or waiving resource consent application fees.	Retain Policy IB-P6
<b>Kapiro Conservation Trust (S442)</b>	S442.081	Ecosystems and indigenous biodiversity	IB-P6	Support in part	Non-regulatory methods are supported but also need district wide mapping and rules around SNA protection.	Amend IB-P6 to reflect introduction of district wide mapping and rules for SNAs in addition to non-regulatory methods. Amend to include reference to consideration of nature based solutions to mitigating the effects of climate change e.g wetlands and afforestation to mitigate drought and flood effects. Amend to include potential for a reduction or waiver of rates where there is good pest and weed control in place or where maintenance/enhancement of indigenous biodiversity will provide significant ecosystem services e.g. wetland establishment to mitigate flood risk to the wider area.
<b>Kapiro Conservation Trust (S442)</b>	S442.178	Ecosystems and indigenous biodiversity	IB-P6	Support in part	Regulatory methods that include district wide mapping of SNAs is also required Consideration of nature based solutions and	Amend to reflect introduction of district wide mapping and rules for SNAs in addition to non-regulatory methods ; and

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					rates relief in return for biodiversity protection and enhancement.	Amend to include reference to encouraging nature based solutions for mitigating natural hazards and the effects of climate change e.g creating wetlands and afforestation to mitigate drought and flood effects; and Amend to include potential for a reduction or waiver of rates where there is good pest and weed control in place or where maintenance / enhancement of indigenous biodiversity will provide significant ecosystem services e.g. wetlands or afforestation to mitigate flood risk for a wider catchment.
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.062	Ecosystems and indigenous biodiversity	IB-P6	Support in part	Non-regulatory methods are supported but also need district wide mapping and rules around SNA protection	Amend IB-P6 to reflect introduction of district wide mapping and rules for SNAs in addition to non-regulatory methods. Amend to include reference to consideration of nature based solutions to mitigating the effects of climate change e.g wetlands and afforestation to mitigate drought and flood effects. Amend to include potential for a reduction or waiver of rates where there is good pest and weed control in place or where maintenance/enhancement of indigenous biodiversity will provide significant ecosystem services e.g. wetland establishment to mitigate flood risk to the wider area.
<b>Marianna Fenn (S542)</b>	S542.008	Ecosystems and indigenous biodiversity	IB-P6	Support in part	Regulatory methods that include district wide mapping of SNAs is also required Consideration of nature based solutions and rates relief in return for biodiversity protection and enhancement	Amend to reflect introduction of district wide mapping and rules for SNAs in addition to non-regulatory methods ; and Amend to include reference to encouraging nature based solutions for mitigating natural hazards and the



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						effects of climate change e.g creating wetlands and afforestation to mitigate drought and flood effects; and Amend to include potential for a reduction or waiver of rates where there is good pest and weed control in place or where maintenance / enhancement of indigenous biodiversity will provide significant ecosystem services e.g. wetlands or afforestation to mitigate flood risk for a wider catchment.
<b>Te Rūnanga o Ngāti Rēhia (S559)</b>	S559.023	Ecosystems and indigenous biodiversity	IB-P6	Oppose	Biodiversity and its continued protection are important to Ngāti Rēhia. Our whakapapa connects us to all our native fauna and flora. It is our kaitiaki responsibility to listen to our native fauna and flora and be their voice. Māori land is usually undeveloped land, historically we were not provided the same ability to lend, receive subsidies, or grants to allow us to develop at the same way as non-Māori. This has left Māori as owners of majority of the large parcels of land that have high biodiversity values in the Far North outside of the Crown owned conversation blocks. Policy and rules should not impact our ability utilise our whenua in a way that will help us to provide social, cultural and economic prosperity for our people. The current approach to provisions is not considered to meet s6(e) of the RMA.	Delete IB-P6 and redraft with tangata whenua (inferred).
<b>Ballance Agri-Nutrients Limited (S143)</b>	S143.006	Ecosystems and indigenous biodiversity	IB-P7	Support	Ballance supports policies that actively support and provide for the management of pest plants and pest animals to enhance biodiversity values	Retain the policy IB -P7
<b>Horticulture New Zealand (S159)</b>	S159.052	Ecosystems and indigenous biodiversity	IB-P7	Support in part	Recognition of the need for management of pest plants and pest animals is supported, however the terms are not defined. It should be clear that these include pests under the	Amend Policy IB-P7 as follows: <del>Encourage and support active management of pest plants</del>

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					Regional Pest Management Plan and unwanted organisms under the Biosecurity Act 1993. This would provide the policy framework to support rules providing for biosecurity.	<del>and pest animals.</del> <b>Provide for the active management of pest plants and pest animals including those identified in the Regional Pest Management Plan and unwanted organisms under the Biosecurity Act 1993.</b>
<b>NZ Agricultural Aviation Association (S182)</b>	S182.015	Ecosystems and indigenous biodiversity	IB-P7	Support in part	support policies that actively provide for the management of pest plants and pest animals to enhance biodiversity values	Amend Policy IB-P7
<b>Heather Golley (S254)</b>	S254.004	Ecosystems and indigenous biodiversity	IB-P7	Oppose	Opposes objectives, sections, policies, rules, regulations, practice notes, and supporting documentation which relates to wellbeing, dog owners, dogs, the banning of dogs and cats (via resource consent conditions, covenants or consent notices), the impact of dogs on the environment, kennels, subdivisions, dogs and their relationship with native flora and fauna, significant natural areas, zoning which limits dog ownership, and dog limits placed on Significant Natural Areas (SNAs). There is no identification of SNA's or the "Kiwi" areas referred to in the provisions, that also makes it impossible to properly understand and assess the impact of the DP on individuals and or the district. Our dogs are our family members, best friends, counsellors, workmates, pig hunters, and brilliant farmhands. Cats are family to many people, especially the elderly. Submitter does not accept that FNDC has a right to ban and restrict her family from owning pets responsibly, anywhere in Northland. FNDC needs to consider the unintended consequences of their actions including but not limited to: - humanitarian and mental health crises with	Amend the provisions of the District Plan so they do not limit dog ownership or result in the banning of dogs and cats (via resource consent conditions, covenants or consent notices) (inferred). Make critical supporting documents, and all other undisclosed relevant information publicly available now, including Draft SNA maps, The 'Practice Note for Significant Indigenous Flora and Fauna', and the 'Bay of Islands Kiwi Distribution Map - Support Document'.

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					<p>people having to relinquish pets</p> <ul style="list-style-type: none"> <li>- animal rescue services and pounds being overwhelmed with dogs and cats, financially stressed</li> <li>- fewer children living in homes which have dogs and cats, which means they will increase their risk of harm from dogs because they will not learn how to care for, respect, and control their dogs.</li> <li>- less positive view of our district as a retirement area.</li> </ul>	
<b>The BOI Watchdogs (S354)</b>	S354.020	Ecosystems and indigenous biodiversity	IB-P7	Oppose	Dogs are not pests and should not be considered that by the Plan.	Amend this policy so that it does not apply to dogs (inferred).
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.042	Ecosystems and indigenous biodiversity	IB-P7	Support in part	The Director-General considers control is a more appropriate wording here as management can also relate to biodiversity assets.	Amend Policy IB-P7 as follows: Encourage and support active <del>management</del> <b>control</b> of pest plants and pest animals.
<b>Kapiro Conservation Trust (S442)</b>	S442.179	Ecosystems and indigenous biodiversity	IB-P7	Support	Consideration should be given to providing rates relief and other incentives to encourage landowners to control weeds and animal pests on their land.	Amend to include reference to potential incentives that could be provided.
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527)</b>	S527.010	Ecosystems and indigenous biodiversity	IB-P7	Support	not stated	Retain IB-P7 as drafted (inferred)
<b>Carbon Neutral NZ Trust (S529)</b>	S529.134	Ecosystems and indigenous biodiversity	IB-P7	Support		Retain IB-P7
<b>Marianna Fenn (S542)</b>	S542.009	Ecosystems and indigenous biodiversity	IB-P7	Support	Consideration should be given to providing rates relief and other incentives to encourage landowners to control weeds and animal pests on their land	Amend to include reference to potential incentives that could be provided

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<b>Kapiro Conservation Trust (S442)</b>	S442.082	Ecosystems and indigenous biodiversity	IB-P8	Support in part	Eco sourcing of native plants extremely important to protect variations in species genetics.	Amend: <b>Assist with protections of</b> <del>Promote the protection of</del> species that are endemic to Northland by <b>promoting, supporting and using</b> eco-sourced plants from within the ecological district.
<b>Kapiro Conservation Trust (S442)</b>	S442.180	Ecosystems and indigenous biodiversity	IB-P8	Support in part	Eco sourcing is important to protect variations in species genetics.	Amend:" <b>Assist with protection of</b> <del>Promote the protection of</del> species that are endemic to <b>Northland by promoting, supporting and using</b> eco-sourced plants from within the ecological district"
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.063	Ecosystems and indigenous biodiversity	IB-P8	Support in part	Eco sourcing of native plants extremely important to protect variations in species genetics	Amend IB-P8 Promote <b>Assist with protections of</b> <del>Promote the protection of</del> species that are endemic to Northland by <b>promoting, supporting and using</b> eco-sourced plants from within the ecological district
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527)</b>	S527.011	Ecosystems and indigenous biodiversity	IB-P8	Support	not stated	Retain IB-P8 as drafted (inferred)
<b>Carbon Neutral NZ Trust (S529)</b>	S529.135	Ecosystems and indigenous biodiversity	IB-P8	Support		Retain IB-P8

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<b>Marianna Fenn (S542)</b>	S542.010	Ecosystems and indigenous biodiversity	IB-P8	Support in part	Eco sourcing is important to protect variations in species genetics	Amend <b>Assist with protection of</b> <del>Promote the protection of</del> species that are endemic to Northland by <b>promoting, supporting and using</b> eco-sourced plants from within the ecological district
<b>Martin John Yuretich (S40)</b>	S40.010	Ecosystems and indigenous biodiversity	IB-P9	Support in part	DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control.	Delete the word "require" from Rule IB-R9 and replace it with the word "assist".
<b>Joel Vieviorka (S41)</b>	S41.010	Ecosystems and indigenous biodiversity	IB-P9	Oppose	DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control.	Delete the word "require" from Rule IB-R9 and replace it with the word "assist".

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<b>Paul O'Connor (S48)</b>	S48.001	Ecosystems and indigenous biodiversity	IB-P9	Support in part	making owners carry out pest control while excepting DOC from this responsibility is unfair and unworkable given DOC own the majority of land often adjacent to private blocks. Many lot owners already carry out pest control and this should be encouraged	Amend IB-P9 remove the word 'require' and replace with the 'assist' in this rule
<b>Robyn Josephine Baker (S69)</b>	S69.003	Ecosystems and indigenous biodiversity	IB-P9	Support in part	We don't know of any of our neighbouring landowners who are not already actively and at their own expense, eradicating noxious animals/predators. To make it a legal requirement is unnecessary, and, in practical terms, unenforceable.	Amend IB-P9 to remove the word 'require' from the policy and replace it with 'assist'.
<b>Strand Homes Ltd/Okahu Developments Ltd (S77)</b>	S77.009	Ecosystems and indigenous biodiversity	IB-P9	Support in part	DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control.	Delete the word "require" from this rule and replace it with "assist".
<b>Trevor John Ashford (S146)</b>	S146.010	Ecosystems and indigenous biodiversity	IB-P9	Oppose	DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners	Delete the word "require" from this rule and replace it with "assist".

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					(except DOC, lets face it) carry out pest control.	
<b>Summit Forests New Zealand Limited (S148)</b>	S148.017	Ecosystems and indigenous biodiversity	IB-P9	Oppose	<p>SFNZ acknowledges the statements made regarding the high proportion of the District that has potentially significant ecological values and the fact that over half of those lands are in private ownership. As noted, this creates potential tension between those seeking to protect those areas and those wishing to make reasonable economic use of their lands. It is essential that the Plan takes a pragmatic approach to protecting significant natural areas and allowing people to meet their social, economic, and cultural wellbeing by:</p> <ul style="list-style-type: none"> <li>- Ensuring there is certainty about what is or is not an SNA including drawing clear boundaries between rural production areas and SNA and ensuring there is reliable mapping of SNA across the district.</li> <li>- Supporting landowners with the costs of identifying and managing SNA on their lands</li> <li>- Avoiding unnecessary compliance costs associated with potential SNA and rural production activities.</li> </ul> <p>Without significant support from the Council IB-P9 is potentially onerous</p>	Amend IB-P9 to read "Support landowners to manage pets and pest species, including dogs, cats, possums, rats and mustelids, to avoid risks to threatened indigenous species, ...." Or words of like effect.
<b>Horticulture New Zealand (S159)</b>	S159.053	Ecosystems and indigenous biodiversity	IB-P9	Support in part	Need to be specific that landowners are only responsible for pets and pests on their land	Amend Policy IB-P9 as follows: Require landowners to manage pets and pest species <b>on their land</b> , including dogs, cats, possums, rats and mustelids, to avoid risks to threatened indigenous species, including avoiding the introduction of pets and pest species into kiwi present or high-density kiwi areas.

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<b>Shanon Garton (S161)</b>	S161.009	Ecosystems and indigenous biodiversity	IB-P9	Support in part	DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control.	Delete the word "require" from this rule and replace it with "assist".
<b>Julianne Sally Bainbridge (S163)</b>	S163.013	Ecosystems and indigenous biodiversity	IB-P9	Support in part	DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control.	Delete the word "require" from this rule and replace it with "assist".
<b>Heather Golley (S254)</b>	S254.001	Ecosystems and indigenous biodiversity	IB-P9	Oppose	Opposes objectives, sections, policies, rules, regulations, practice notes, and supporting documentation which relates to wellbeing, dog owners, dogs, the banning of dogs and cats (via resource consent conditions, covenants or consent notices), the impact of dogs on the environment, kennels, subdivisions, dogs and their relationship with native flora and fauna, significant natural areas, zoning which limits dog ownership,	Amend the provisions of the District Plan so they do not limit dog ownership or result in the banning of dogs and cats (via resource consent conditions, covenants or consent notices) (inferred). Make critical supporting documents, and all other undisclosed relevant information publicly available now, including Draft SNA maps, The 'Practice Note for



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					<p>and dog limits placed on Significant Natural Areas (SNAs). There is no identification of SNA's or the "Kiwi" areas referred to in the provisions, that also makes it impossible to properly understand and assess the impact of the DP on individuals and or the district. Our dogs are our family members, best friends, counsellors, workmates, pig hunters, and brilliant farmhands. Cats are family to many people, especially the elderly. Submitter does not accept that FNDC has a right to ban and restrict her family from owning pets responsibly, anywhere in Northland. FNDC needs to consider the unintended consequences of their actions including but not limited to:</p> <ul style="list-style-type: none"> <li>- humanitarian and mental health crises with people having to relinquish pets</li> <li>- animal rescue services and pounds being overwhelmed with dogs and cats, financially stressed</li> <li>- fewer children living in homes which have dogs and cats, which means they will increase their risk of harm from dogs because they will not learn how to care for, respect, and control their dogs.</li> <li>- less positive view of our district as a retirement area.</li> </ul>	<p>Significant Indigenous Flora and Fauna', and the 'Bay of Islands Kiwi Distribution Map - Support Document'.</p>
<p><b>Amber Hookway (S261)</b></p>	<p>S261.008</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-P9</p>	<p>Oppose</p>	<p>Opposes responsible pet owners being penalised unfairly regarding dogs and cats on their property A landuse consent can have a kiwi condition added yet a property recently subdivided and for sale in the same area can say "animal friendly" presumably with no kiwi condition. Irresponsible pet owners are going to be noncompliant whatever condition is applied and encouragement rather than a ban will be more effective ie) reduction in registration fee for dogs who have a current kiwi aversion certificate. The Northern Advocate published an article 13/10/22 stating "Northland's kiwi</p>	<p>Delete Policy (inferred). Stop the blanket banning of pets in the Far North. Every week people are trying to rehome their animals as they cannot get rentals with them.</p>

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					population now in good health, NRC says" The North Island brown kiwi population in Northland is now in good health thanks to the conservation efforts of landowners and communities over many years. Every week people are trying to rehome their animals as they cannot get rentals with them.	
<b>Wilson Hookway (S264)</b>	S264.008	Ecosystems and indigenous biodiversity	IB-P9	Oppose	Opposes responsible pet owners being penalised unfairly regarding dogs and cats on their property A landuse consent can have a kiwi condition added yet a property recently subdivided and for sale in the same area can say "animal friendly" presumably with no kiwi condition. Irresponsible pet owners are going to be noncompliant whatever condition is applied and encouragement rather than a ban will be more effective ie) reduction in registration fee for dogs who have a current kiwi aversion certificate. The Northern Advocate published an article 13/10/22 stating "Northland's kiwi population now in good health, NRC says" The North Island brown kiwi population in Northland is now in good health thanks to the conservation efforts of landowners and communities over many years. Every week people are trying to rehome their animals as they cannot get rentals with them.	Delete Policy (inferred). Stop the blanket banning of pets in the Far North. Every week people are trying to rehome their animals as they cannot get rentals with them
<b>Danielle Hookway (S309)</b>	S309.008	Ecosystems and indigenous biodiversity	IB-P9	Oppose	Every week people are trying to rehome their animals as they cannot get rentals with them. I oppose responsible pet owners being penalised unfairly regarding dogs and cats on their property. A land use consent can have a kiwi condition added yet a property recently subdivided and for sale in the same area can say 'animal friendly' presumably with no kiwi condition. Irresponsible pet owners are going to be noncompliant whatever condition is applied and encouragement rather than a ban will be more effective i.e. reduced dog registration fees for dogs with kiwi aversion certificate.	Amend IB-P9 so that it does not infer a blanket banning of pets in the Far North (inferred).

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<b>Lianne Kennedy (S310)</b>	S310.008	Ecosystems and indigenous biodiversity	IB-P9	Oppose	Every week people are trying to rehome their animals as they cannot get rentals with them. I oppose responsible pet owners being penalised unfairly regarding dogs and cats on their property. A land use consent can have a kiwi condition added yet a property recently subdivided and for sale in the same area can say 'animal friendly' presumably with no kiwi condition. Irresponsible pet owners are going to be noncompliant whatever condition is applied and encouragement rather than a ban will be more effective i.e. reduced dog registration fees for dogs with kiwi aversion certificate.	Amend IB-P9 so that it does not infer a blanket banning of pets in the Far North (inferred).
<b>Allen Hookway (S311)</b>	S311.008	Ecosystems and indigenous biodiversity	IB-P9	Oppose	Every week people are trying to rehome their animals as they cannot get rentals with them. I oppose responsible pet owners being penalised unfairly regarding dogs and cats on their property. A land use consent can have a kiwi condition added yet a property recently subdivided and for sale in the same area can say 'animal friendly' presumably with no kiwi condition. Irresponsible pet owners are going to be noncompliant whatever condition is applied and encouragement rather than a ban will be more effective i.e. reduced dog registration fees for dogs with kiwi aversion certificate.	Amend IB-P9 so that it does not infer a blanket banning of pets in the Far North (inferred).
<b>Sapphire Surveyors Limited (S348)</b>	S348.008	Ecosystems and indigenous biodiversity	IB-P9	Support in part	DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. While they are exempt from paying rates, they should not be exempt from the responsibilities of the community in this regard. It is unreasonable to put this responsibility on all ratepayers in these zones, while a lot of DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition, and setting up pest control programmes in DOC areas is a	Delete the word "require" from Rule IB-P9 and replace it with the word "assist".

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					very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control.	
<b>The BOI Watchdogs (S354)</b>	S354.021	Ecosystems and indigenous biodiversity	IB-P9	Oppose	Dogs should not be considered a pest.	Delete reference to dogs in this policy
<b>Sean Frieling (S357)</b>	S357.039	Ecosystems and indigenous biodiversity	IB-P9	Support in part	It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DoC lands which are usually (unless managed by community groups) a significant source of these pests. If the word require remains, then Council will either have to enforce this with DoC or help facilitate community groups to easily set up trapping programmes on DoC land.	Delete the word 'require' from this rule and insert the word 'assist' OR if the word 'require' is retained, enforce this with DOC or help facilitate community groups (or perhaps a District wide organisation) to easily set up trapping programmes on DOC land.
<b>Leah Frieling (S358)</b>	S358.042	Ecosystems and indigenous biodiversity	IB-P9	Support in part	DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. While they are exempt from paying rates, they should not be exempt from the responsibilities of the community in this regard. It is unreasonable to put this responsibility on all ratepayers in these zones, while a lot of DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition, and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control.	Amend Policy IB-P9 as follows: <del>Require</del> Assist landowners to manage pets and pest species, including dogs, cats, possums, rats and mustelids, to avoid risks to threatened indigenous species, including avoiding the introduction of pets and pest species into kiwi present or high-density kiwi areas. OR if the word 'require' is retained, enforce this with DOC or help facilitate community groups (or perhaps a District wide organisation) to easily set up trapping programmes on DOC land.

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<b>Rua Hatu Trust (S377)</b>	S377.010	Ecosystems and indigenous biodiversity	IB-P9	Support in part	DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control.	Delete the word "require" from this rule and replace it with "assist".
<b>Sean Jozef Vercammen (S395)</b>	S395.010	Ecosystems and indigenous biodiversity	IB-P9	Support in part	DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control.	Delete the word "require" from this [policy] and replace it with "assist"
<b>Kerry-Anne Smith (S410)</b>	S410.010	Ecosystems and indigenous biodiversity	IB-P9	Support in part	DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition and setting up	Delete the word "require" from this rule and replace it with "assist".

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					pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control.	
<b>Roger Myles Smith (S411)</b>	S411.010	Ecosystems and indigenous biodiversity	IB-P9	Support in part	DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control.	Delete the word "require" from this rule and replace it with "assist".
<b>John Joseph and Jacqueline Elizabeth Matthews (S439)</b>	S439.010	Ecosystems and indigenous biodiversity	IB-P9	Support in part	DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control.	Delete the word " <del>require</del> " from Policy IB-P9 and replace the word with " <b>assist</b> ". Note: If you want to retain the word "require", either enforce this with DOC or help facilitate community groups to easily set up trapping programmes on DOC land.
<b>Kapiro Conservation Trust (S442)</b>	S442.083	Ecosystems and indigenous biodiversity	IB-P9	Support in part	Question the practicality and enforceability of requiring landowners to manage pest species. This would be a particularly onerous requirement for owners of large blocks of	Amend to clarify that restrictions on pet ownership and pest/weed control will be considered as conditions of

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					native forest. Focus on non-regulatory methods may be more appropriate. This policy would have more success if it was restricted to subdivision and development consents rather than as a general provisions applicable to all landowners.	consent for subdivision and development.
<b>Kapiro Conservation Trust (S442)</b>	S442.181	Ecosystems and indigenous biodiversity	IB-P9	Support in part	Support a requirement to manage domestic pets. Need to also include livestock (pigs, goats, cattle, etc.) as they can be very destructive to habitat for threatened species. The requirements should also extend to land occupiers. Further limits and conditions on pet ownership and a requirement for pest and weed control could be imposed in the context of a consent for subdivision or development.	<ul style="list-style-type: none"> <li>Amend to require management and (where appropriate) limits on the numbers of domestic pets and livestock for landowners and land occupiers; and</li> <li>Amend to clarify that further limits and pest and weed control will be considered when possible and appropriate.</li> </ul>
<b>LJ King Ltd (S464)</b>	S464.010	Ecosystems and indigenous biodiversity	IB-P9	Support in part	<p>DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests.</p> <p>Given that a lot of people carry out pest control of their own volition and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control.</p>	Delete the word "require" from this rule and replace it with "assist".
<b>Helmut Friedrich Paul Letz and Angelika Eveline Letz (S470)</b>	S470.010	Ecosystems and indigenous biodiversity	IB-P9	Support in part	DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a	Delete the word "require" from this rule and replace it with "assist".

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					<p>significant source of these pests. Given that a lot of people carry out pest control of their own volition and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control.</p>	
<b>Michael Foy (S472)</b>	S472.047	Ecosystems and indigenous biodiversity	IB-P9	Support in part	<p>DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control.</p>	amend to Delete the word "require" from this rule and replace it with "assist".
<b>Elbury Holdings (S485)</b>	S485.011	Ecosystems and indigenous biodiversity	IB-P9	Support in part	<p>DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control.</p>	Delete the word "require" from this rule and replace it with "assist".



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<b>Kate Burdekin (S507)</b>	S507.001	Ecosystems and indigenous biodiversity	IB-P9	Support in part	We need to improve the lives of neglected dogs in the Far North. The Council are making it so difficult for people in the Far North to achieve their dream of owning a dog. There are so many properties now that have a no dog covenant on it, or by introducing SNAs on land and encouraging people to take out conservation covenants, meaning no companion animals can be kept, in return for reduced rates. Many dog owners care for all animals / birds and love nature. Especially in the Far North where many of us have chosen to live in a rural community. There needs to be a change in attitude towards dog owners and kiwi protection.	Amend wording so that pets and pests are not used in the same breath. Rather than an overall ban on dogs, put covenants in place allowing ownership of companion animals under certain conditions - fenced garden, animals to be kept inside at night (this also ensures their safety), no dogs to be chained and must be adequately cared for, and encourage dog owners to get involved in protecting kiwis. Maybe a campaign with positive ideas how dogs and kiwi can live side by side.
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.064	Ecosystems and indigenous biodiversity	IB-P9	Support in part	Question the practicality and enforceability of requiring landowners to manage pest species. This would be a particularly onerous requirement for owners of large blocks of native forest. Focus on non-regulatory methods may be more appropriate. This policy would have more success if it was restricted to subdivision and development consents rather than as a general provision applicable to all landowners.	Amend to clarify that restrictions on pet ownership and pest/weed control will be considered as conditions of consent for subdivision and development
<b>New Zealand Kiwifruit Growers Incorporated (S518)</b>	S518.001	Ecosystems and indigenous biodiversity	IB-P9	Support in part	Residents in the district are very protective of the Kiwi population and most see roaming dogs and cats as a real threat. Unfortunately, some don't recognise that their own pets can be a threat to native species. Neighbours need to be aware of landowner's efforts to control pests on their properties and the need to keep their pets on their own properties. We note that in some areas pigs are a real threat especially in spring when the pigs will root up whole kiwifruit blocks even during the day.	Amend IB-P9 as follows: 'Require landowners to manage pets and pest species <b>on their own land</b> , including dogs, cats, possums, rats and mustelids, to avoid risks to threatened indigenous species, including avoiding the introduction of pets and pest species into kiwi present or high-density kiwi areas.'

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<b>Elbury Holdings (S519)</b>	S519.011	Ecosystems and indigenous biodiversity	IB-P9	Support in part	The Department of Conservation who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition and set up pest control programmes in DOC areas, there are better ways to achieve the outcome of Kiwi protection than making landowners carry out pest control.	Delete the word "require" from this [policy] and replace it with "assist".
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527)</b>	S527.012	Ecosystems and indigenous biodiversity	IB-P9	Support	not stated	Retain IB-P9 as drafted (inferred)
<b>Carbon Neutral NZ Trust (S529)</b>	S529.136	Ecosystems and indigenous biodiversity	IB-P9	Support		Retain IB-P9
<b>Elbury Holdings (S541)</b>	S541.010	Ecosystems and indigenous biodiversity	IB-P9	Oppose	DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control.	Delete the word "require" from this [policy] and replace it with "assist".

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<b>Marianna Fenn (S542)</b>	S542.011	Ecosystems and indigenous biodiversity	IB-P9	Support in part	Support a requirement to manage domestic pets. Need to also include livestock (pigs, goats, cattle, etc.) as they can be very destructive to habitat for threatened species. The requirements should also extend to land occupiers. Further limits and conditions on pet ownership and a requirement for pest and weed control could be imposed in the context of a consent for subdivision or development	Amend to require management and (where appropriate) limits on the numbers of domestic pets and livestock for landowners and land occupiers; and Amend to clarify that further limits and pest and weed control will be considered when possible and appropriate
<b>LJ King Limited (S543)</b>	S543.010	Ecosystems and indigenous biodiversity	IB-P9	Support in part	DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control	Delete the word "require" from this [policy] and replace it with "assist".
<b>Kelvin Richard Horsford (S544)</b>	S544.010	Ecosystems and indigenous biodiversity	IB-P9	Support in part	DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control	Delete the word "require" from this rule and replace it with "assist"

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<b>LJ King Limited (S547)</b>	S547.010	Ecosystems and indigenous biodiversity	IB-P9	Support in part	DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control	Delete the word "require" from this [policy] and replace it with "assist".
<b>Scrumptious Fruit Trust (S568)</b>	S568.003	Ecosystems and indigenous biodiversity	IB-P9	Support in part		amend IB-P9 to refer to endangered foreshore habitat not just kiwi
<b>Rodney S Gates and Cherie R Gates (S569)</b>	S569.010	Ecosystems and indigenous biodiversity	IB-P9	Support in part	DOC, who own the majority of Kiwi areas in the Far North, should be the first "landowner" to be "required" to do this under this rule. It is unreasonable to put this responsibility on all ratepayers in these zones, especially those adjacent to DOC lands which are usually (unless managed by community groups) a significant source of these pests. Given that a lot of people carry out pest control of their own volition and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest control.	Delete the word "require" from this [policy] and replace it with "assist".
<b>Bentzen Farm Limited (S167)</b>	S167.020	Ecosystems and indigenous biodiversity	IB-P10	Support in part	Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas. Without mapping the SNAs, the associated	Amend Policy IB-P10 as follows: Manage land use and subdivision to address the effects of the activity requiring resource consent for indigenous vegetation clearance and associated land disturbance, including

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					rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.	(but not limited to) consideration of the following matters where relevant to the application: ... <del>h. where the area has been mapped or assessed as a Significant Natural Areas:</del> <del>i. the extent to which the proposal will adversely affect the ecological significance, values and function of that area;</del> <del>ii. whether it is appropriate or practicable to use biodiversity offsets or environmental biodiversity compensation to address more than minor residual adverse effects;</del> .... "
<b>Setar Thirty Six Limited (S168)</b>	S168.027	Ecosystems and indigenous biodiversity	IB-P10	Support in part	Amendments to the overview section, and the objectives, policies and rules are sought to: 1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and 2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process. Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas. Without mapping the SNAs, the associated rules lack precision, and in relying on case-	Amend Policy IB-P10 as follows: Manage land use and subdivision to address the effects of the activity requiring resource consent for indigenous vegetation clearance and associated land disturbance, including (but not limited to) consideration of the following matters where relevant to the application: ... <del>h. where the area has been mapped or assessed as a Significant Natural Areas:</del> <del>i. the extent to which the proposal will adversely affect the ecological significance, values and function of that area;</del> <del>ii. whether it is</del>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					by-case assessment by landowners as proposed, risk not being consistently applied.	<del>appropriate or practicable to use biodiversity offsets or environmental biodiversity compensation to address more than minor residual adverse effects; ...</del>
<b>The Shooting Box Limited (S187)</b>	S187.020	Ecosystems and indigenous biodiversity	IB-P10	Support in part	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <ol style="list-style-type: none"> <li>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</li> <li>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</li> </ol> <p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas.</p> <p>Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.</p>	<p>Amend Policy IB-P10 as follows:            Manage land use and subdivision to address the effects of the activity requiring resource consent for indigenous vegetation clearance and associated land disturbance, including (but not limited to) consideration of the following matters where relevant to the application:  <del>...h. where the area has been mapped or assessed as a Significant Natural Areas:</del>            i. the extent to which the proposal will adversely affect the ecological significance, values and function of that area;            ii. whether it is <del>appropriate or practicable to use biodiversity offsets or environmental biodiversity compensation to address more than minor residual adverse effects</del></p>
<b>Wendover Two Limited (S222)</b>	S222.027	Ecosystems and	IB-P10	Support in part	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p>	<p>Amend Policy IB-P10 as follows:            Manage land use and subdivision to address the effects of the activity</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
		indigenous biodiversity			<p>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</p> <p>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</p> <p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas.</p> <p>Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.</p>	<p>requiring resource consent for indigenous vegetation clearance and associated land disturbance, including (but not limited to) consideration of the following matters where relevant to the application: ...<del>h. where the area has been mapped or assessed as a Significant Natural Areas;</del><del>i. the extent to which the proposal will adversely affect the ecological significance, values and function of that area;</del><del>ii. whether it is appropriate or practicable to use biodiversity offsets or environmental biodiversity compensation to address more than minor residual adverse effects;</del>...."</p>
Matauri Trustee Limited (S243)	S243.029	Ecosystems and indigenous biodiversity	IB-P10	Oppose	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <p>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</p> <p>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</p> <p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas.</p> <p>Without mapping the SNAs, the associated</p>	<p>Amend Policy IB-P10 as follows: Manage land use and subdivision to address the effects of the activity requiring resource consent for indigenous vegetation clearance and associated land disturbance, including (but not limited to) consideration of the following matters where relevant to the application: ...<del>h. where the area has been mapped or assessed as a Significant Natural Areas;</del><del>i. the extent to which the proposal will adversely affect the ecological significance, values and function of that area;</del><del>ii. whether it is</del></p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.	<del>appropriate or practicable to use biodiversity offsets or environmental biodiversity compensation to address more than minor residual adverse effects;</del> ...."
<b>Heather Golley (S254)</b>	S254.005	Ecosystems and indigenous biodiversity	IB-P10	Oppose	<p>Opposes objectives, sections, policies, rules, regulations, practice notes, and supporting documentation which relates to wellbeing, dog owners, dogs, the banning of dogs and cats (via resource consent conditions, covenants or consent notices), the impact of dogs on the environment, kennels, subdivisions, dogs and their relationship with native flora and fauna, significant natural areas, zoning which limits dog ownership, and dog limits placed on Significant Natural Areas (SNAs). There is no identification of SNA's or the "Kiwi" areas referred to in the provisions, that also makes it impossible to properly understand and assess the impact of the DP on individuals and or the district.</p> <p>Our dogs are our family members, best friends, counsellors, workmates, pig hunters, and brilliant farmhands. Cats are family to many people, especially the elderly.</p> <p>Submitter does not accept that FNDC has a right to ban and restrict her family from owning pets responsibly, anywhere in Northland. FNDC needs to consider the unintended consequences of their actions including but not limited to:</p> <ul style="list-style-type: none"> <li>- humanitarian and mental health crises with people having to relinquish pets</li> <li>- animal rescue services and pounds being overwhelmed with dogs and cats, financially stressed</li> <li>- fewer children living in homes which have</li> </ul>	Amend the provisions of the District Plan so they do not limit dog ownership or result in the banning of dogs and cats (via resource consent conditions, covenants or consent notices) (inferred). Make critical supporting documents, and all other undisclosed relevant information publicly available now, including Draft SNA maps, The 'Practice Note for Significant Indigenous Flora and Fauna', and the 'Bay of Islands Kiwi Distribution Map - Support Document'.



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					dogs and cats, which means they will increase their risk of harm from dogs because they will not learn how to care for, respect, and control their dogs. - less positive view of our district as a retirement area.	
<b>Russell Landcare Trust (S276)</b>	S276.017	Ecosystems and indigenous biodiversity	IB-P10	Oppose	Policy IB-P10 is a list of matters to be considered when assessing proposals but it doesn't provide real guidance to decision-makers regarding the "bottom lines" for each of those matters.	Amend policy IB-P10 to provide real guidance to decision-makers regarding "bottom lines" for each of the matters.
<b>P S Yates Family Trust (S333)</b>	S333.019	Ecosystems and indigenous biodiversity	IB-P10	Support in part	Amendments to the overview section, and the objectives, policies and rules are sought to: 1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and 2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process. Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas. Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.	Amend Policy IB-P10 as follows: Manage land use and subdivision to address the effects of the activity requiring resource consent for indigenous vegetation clearance and associated land disturbance, including (but not limited to) consideration of the following matters where relevant to the application: <del>...h. where the area has been mapped or assessed as a Significant Natural Area;i. the extent to which the proposal will adversely affect the ecological significance, values and function of that area;ii. whether it is appropriate or practicable to use biodiversity offsets or environmental biodiversity compensation to address more than minor residual adverse effects;</del>

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<b>The BOI Watchdogs (S354)</b>	S354.022	Ecosystems and indigenous biodiversity	IB-P10	Oppose	Controls should not be placed on the ownership of dogs until BOI Watchdog concerns have been addressed in order to determine if they are appropriate. Refer to full submission.	Delete this policy and all its subsections
<b>Kapiro Conservation Trust (S442)</b>	S442.084	Ecosystems and indigenous biodiversity	IB-P10	Support in part	Support the broad identification of matters that may be considered but the provision should also include development.	Amend "Manage <b>development</b> , land use and subdivision..."
<b>Transpower New Zealand Ltd (S454)</b>	S454.086	Ecosystems and indigenous biodiversity	IB-P10	Not Stated	A consequential amendment to this policy is required to ensure that the FNPDP gives effect to the NPSET as set out in the submission point on I-P2 above.	Amend the chapeau of IB-P10 as follows: Manage land use and subdivision, <b>subject to Policy I-Px</b> , to address the effects of the activity requiring resource consent for indigenous vegetation clearance and associated land disturbance, including (but not limited to) consideration of the following matters where relevant to the application:
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.065	Ecosystems and indigenous biodiversity	IB-P10	Support in part	Support the broad identification of matters that may be considered but the provision should also include development.	Amend "Manage <b>development</b> , land use and subdivision..."
<b>Carbon Neutral NZ Trust (S529)</b>	S529.137	Ecosystems and indigenous biodiversity	IB-P10	Support in part	The draft PDP of 2021 contained a policy (IB-P10) that specifically aimed to 'Protect indigenous biodiversity by considering the following matters when assessing proposals for land use and subdivision: a.the temporary or permanent nature of any adverse effects; b.cumulative effects of activities that may result in loss or degradation of habitats...' It is a matter of concern that the PDP contains a weaker policy and the word 'protect' was removed.	Amend wording of policy IB-P10 to Protect (inferred) <del>Manage</del> <b>Protect</b> land use and subdivision to address the effects of the activity requiring resource consent for indigenous vegetation clearance and associated land disturbance, including (but not limited to) consideration of the following

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						matters where relevant to the application:.....
<b>Te Rūnanga o Ngāti Rēhia (S559)</b>	S559.024	Ecosystems and indigenous biodiversity	IB-P10	Oppose	Biodiversity and its continued protection are important to Ngāti Rēhia. Our whakapapa connects us to all our native fauna and flora. It is our kaitiaki responsibility to listen to our native fauna and flora and be their voice. Māori land is usually undeveloped land, historically we were not provided the same ability to lend, receive subsidies, or grants to allow us to develop at the same way as non-Māori. This has left Māori as owners of majority of the large parcels of land that have high biodiversity values in the Far North outside of the Crown owned conversation blocks. Policy and rules should not impact our ability utilise our whenua in a way that will help us to provide social, cultural and economic prosperity for our people. The current approach to provisions is not considered to meet s6(e) of the RMA.	Delete IB-P10 and redraft with tangata whenua (inferred).
<b>Summit Forests New Zealand Limited (S148)</b>	S148.019	Ecosystems and indigenous biodiversity	Rules	Not Stated	Not explicitly stated	Amend rules to provide for the clearance and incidental damage of indigenous vegetation, including indigenous vegetation that may meet the criteria for an SNA but excluding any scheduled SNA , within a plantation forest as a permitted activity in accordance with regulation 93 and 94 of the NES-PF.
<b>Julianne Sally Bainbridge (S163)</b>	S163.014	Ecosystems and indigenous biodiversity	Rules	Support in part	Given that a lot of people carry out pest control of their own volition, and setting up pest control programmes in DOC areas is a very difficult and convoluted process, there are better ways to achieve the outcome of Kiwi protection than "making" landowners (except DOC, lets face it) carry out pest	Insert methods to increase activity around pet management and desexing

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					control. Landowners are often the victims of irresponsible pet owners who dump unwanted pets	
<b>Amber Hookway (S261)</b>	S261.007	Ecosystems and indigenous biodiversity	Rules	Oppose	Following protests by tangata whenua, farmers and other landowners who said the proposal to identify land as SNAs undermined their sovereignty and property rights, this opposition culminated in a large hikoi to the Council's Kaikohe headquarters where tangata whenua delivered a petition against the process. Encouraging landowners to include identified Significant Natural Areas in Schedule 4 of the District Plan at the time of subdivision and development; implies this is voluntary when it clearly isn't.	Remove SNAs/wetlands from the District Plan.
<b>Wilson Hookway (S264)</b>	S264.007	Ecosystems and indigenous biodiversity	Rules	Support	Following protests by tangata whenua, farmers and other landowners who said the proposal to identify land as SNAs undermined their sovereignty and property rights, this opposition culminated in a large hikoi to the Council's Kaikohe headquarters where tangata whenua delivered a petition against the process. Encouraging landowners to include identified Significant Natural Areas in Schedule 4 of the District Plan at the time of subdivision and development; implies this is voluntary when it clearly isn't.	Remove SNAs/wetlands from the District Plan.
<b>Tristan Simpkin (S287)</b>	S287.008	Ecosystems and indigenous biodiversity	Rules	Oppose	Oppose SNA Maps and requirement of Ecologist report. FNDC had originally withdrawn the SNA maps. With this new rule they are being snuck back in, and then also forcing anyone with bush on their property to get an ecologist report (\$\$\$) to prove that its not an SNA. So that tells us that all bush is regarded as an SNA 'unless proved otherwise' - which is a costly activity. This is not incentivising people to plant trees and create wetlands, because of the control over that area once it's matured. Far North	Amend to allow us to be stewards of our own land and trees and bush we've planted. Remove the requirement for the ecologist report, it's another red tape item which adds to the cost of building and developing, driving the cost of living upwards.

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					residents will be better off to not plant anything. This therefore is a loss of property and property rights.	
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.010	Ecosystems and indigenous biodiversity	Rules	Not Stated	With the advent of myrtle rust, all Kunzea and Leptospermum taxa are currently considered threatened. The taxonomy and current threatened status of manuka and kanuka should be reflected and managed appropriately through objectives, policies and rules in the proposed plan. The relief sought is to be confirmed during the subsequent District Plan review stages once the 2022 version of the "Conservation status of New Zealand indigenous vascular plants" is available.	Amend objectives, policies and rules as appropriate to recognise and implement measures to address and manage the increased threat status of myrtle rust for manuka and kanuka
<b>Matauri X Incorporation (S396)</b>	S396.024	Ecosystems and indigenous biodiversity	Rules	Oppose	Matauri X do not believe that the provisions of the aforementioned Chapter appropriately meet section 6(e) of the RMA 1991. The approach also does not promote kaitiakitanga and the entire chapter is rejected.	delete rules
<b>Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)</b>	S425.025	Ecosystems and indigenous biodiversity	Rules	Oppose	Council have not mapped 'significant natural areas' (SNA) but have included reference to SNA in rules. PHTTCCT consider the absence of mapping SNA will result in implementation confusion and unnecessary cost to PHTTCCT in order to determine compliance.	amend IB to: - Remove reference to significant natural areas in rules and rely on indigenous vegetation clearance thresholds.
<b>Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)</b>	S425.028	Ecosystems and indigenous biodiversity	Rules	Not Stated	Furthermore, the provisions do not adequately provide for the maintenance, operation and upgrade of regionally significant infrastructure in accordance with the RPS.	amend provisions to ensure that maintenance, operation and upgrade of regionally significant infrastructure is provided for.
<b>Ronald Toni Wooldridge (S440)</b>	S440.004	Ecosystems and indigenous biodiversity	Rules	Oppose	There must be no costs associated with FNDC consents, consultations, inspections and other administrative impositions upon the property owner.	not stated

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Ronald Toni Wooldridge (S440)</b>	S440.005	Ecosystems and indigenous biodiversity	Rules	Oppose	It is appropriate to provide landowners with a list of associated FNDC empowerment and potential actions, consequences as a result of the SNA designation.	Insert provisions explaining potential actions and consequences of a SNA designation
<b>Kapiro Conservation Trust (S442)</b>	S442.005	Ecosystems and indigenous biodiversity	Rules	Oppose	A large number of indigenous species are currently classed as threatened or at risk under the national NZ Threat Classification System. About 50 indigenous bird species have become extinct in Aotearoa New Zealand as a result of human activities. Many technical and policy reports have noted that concerted action is required to prevent further deterioration.	Amend to adopt rules to control and place consent conditions on subdivision, land use or development in, or adjacent to, locations where indigenous species classed as threatened or at risk (under the NZTCS) are present.
<b>Kapiro Conservation Trust (S442)</b>	S442.006	Ecosystems and indigenous biodiversity	Rules	Oppose	The Regional Policy Statement (Method 4.4.3(2)(b)) requires the DP to implement 'Controls on the introduction or keeping of species with recognised pest potential' as part of its implementation of RPS Policy 4.4.1 (examples in Box 1 above).  We consider that the DP should include Policy similar to Policy 12.2.4.10 of the Operative DP but with the aim of protecting not just kiwi, dotterel and brown teal, but also other indigenous species that are classed as threatened or at risk (under NZTCS) and vulnerable to this type of predation.	Amend rules for banning potential predator pets (dogs, cats, mustelids, etc) from areas where kiwi or other at risk/threatened species are present and vulnerable to these predators (e.g. shore birds such as dotterel, wetland birds such as bittern and dabchick, at-risk lizards, and other animals).
<b>Kapiro Conservation Trust (S442)</b>	S442.008	Ecosystems and indigenous biodiversity	Rules	Oppose	We consider that the DP should include Policy similar to Policy 12.2.4.10 of the Operative DP but with the aim of protecting not just kiwi, dotterel and brown teal, but also other indigenous species that are classed as threatened or at risk (under NZTCS) and vulnerable to this type of predation.	Amend PDP to provide for] appropriate fencing for vulnerable species in the area, for example, fencing that allows free movement of kiwi; or in other cases fencing to stop dogs entering a kiwi area.
<b>Kapiro Conservation Trust (S442)</b>	S442.085	Ecosystems and indigenous biodiversity	Rules	Support in part	The chapter rules say the rules simply apply to all zones. However, there is a mismatch between the proposed plan and the National Environmental Standard for Freshwater. Under the NES-FW 2020, reg 54 vegetation clearance is a non-complying activity. The rules are not permitted to be more lenient than the NES-FW.	Amend so as not to conflict or be more lenient than the NES-FW.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Kapiro Conservation Trust (S442)</b>	S442.154	Ecosystems and indigenous biodiversity	Rules	Support in part	Wetland drainage is not addressed.	Insert rules and/or clarify what Northland Regional Council consents are/will be required for wetland drainage under the new Northland Regional Plan.
<b>Pacific Eco-Logic (S451)</b>	S451.010	Ecosystems and indigenous biodiversity	Rules	Support in part	Wetland drainage is not addressed	Insert rules and/or clarify what Northland Regional Council consents are/will be required for wetland drainage under the new Northland Regional Plan
<b>Top Energy Limited (S483)</b>	S483.147	Ecosystems and indigenous biodiversity	Rules	Not Stated	Top Energy acknowledges that objectives and policies for infrastructure within SNAs are located within the Infrastructure Chapter but seek to ensure that appropriate provision for operation, repair, maintenance and upgrade of electricity infrastructure (in particular) is made in the objectives and policies of this Chapter in alignment with method 4.6.3, Policies 5.1.2 and 5.1.3 given that it also relates to indigenous vegetation clearance not captured as significant	Amend rules to allow the suitable provision of new infrastructure where there is an operational and functional need, and the ongoing operation, maintenance, repair and upgrading of infrastructure within areas of indigenous biodiversity.
<b>Top Energy Limited (S483)</b>	S483.149	Ecosystems and indigenous biodiversity	Rules	Oppose	The rules as currently proposed, reference activities 'within' and 'outside of a Significant Natural Area (SNA). However, SNA's have not been included as a mapped value in the PDP. Accordingly, for a Plan user to understand whether or not the provisions relate to indigenous biodiversity, it is assumed they will be required to obtain an ecological assessment (as is indicated in IB-R4) given that the mapping undertaken by Council is no longer publicly available, and as it has not been included in the Plan will not be subject to a Schedule 1 process and cannot be relied on by Council as a statutory layer. This is not considered to be a fair or reasonable approach, and does not provide any certainty for Plan users. This is of particular concern given that these rules have been identified as having immediate	Amend rules to remove reference to 'Significant Natural Areas' in the absence of these being mapped as part of the PDP, and enable appropriate indigenous vegetation clearance for the operation, maintenance, repair and upgrade of infrastructure.

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					<p>'legal effect'.</p> <p>Further, while it is not necessarily of concern to Top Energy, it is noted that this approach, as well as generating issues for Plan users, will create monitoring and compliance issues for Council.</p> <p>With the above in mind, Top Energy seeks that the reference to SNAs be removed from the rules, and that the clearance of indigenous vegetation is what is managed through these rules.</p> <p>Further, that adequate provision is made for upgrades to existing legally established infrastructure to enable future proofing of the infrastructure so as to meet the reasonably foreseeable needs of the community as is directed by RPS Policy 5.2.2.</p>	
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.066	Ecosystems and indigenous biodiversity	Rules	Support in part	The chapter rules say the rules simply apply to all zones. However, there is a mismatch between the proposed plan and the National Environmental Standard for Freshwater. Under the NES-FW 2020, reg 54 vegetation clearance is a non-complying activity. The rules are not permitted to be more lenient than the NES-FW.	Amend so as not to conflict or be more lenient than the NES-FW
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527)</b>	S527.013	Ecosystems and indigenous biodiversity	Rules	Oppose	The PDP lacks rules to implement policies in this chapter.	Amend to strengthen rules to give effect to policies in this chapter (inferred)
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527)</b>	S527.019	Ecosystems and indigenous biodiversity	Rules	Oppose	PDP subdivision policy SUB-P4 refers to 'manage' subdivision as detailed in the district-wide natural environment values, but there are very few rules that put any effective environmental protection policies into effect. Those do not take account of the need to, at least, maintain indigenous biodiversity or ecosystems.	Amend rules to give effect to the protection policies (inferred)
<b>Carbon Neutral NZ Trust (S529)</b>	S529.117	Ecosystems and	Rules	Oppose	The PDP provisions do not provide the level of protection noted in the RMA, Te Mana o te Taiao, anticipated NPS for indigenous	Amend the PDP rules to provide the level of protection noted in the RMA, Te Mana o te Taiao, anticipated NPS



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		indigenous biodiversity			biodiversity, Regional Policy Statement, Environment Court decision	for indigenous biodiversity, Regional Policy Statement, Environment Court decision
<b>Carbon Neutral NZ Trust (S529)</b>	S529.121	Ecosystems and indigenous biodiversity	Rules	Support in part		Amend the PDP rules, to implement the objectives to 'protect, maintain and increase indigenous biodiversity for future generations', or protect significant vegetation and fauna 'for future generations
<b>Carbon Neutral NZ Trust (S529)</b>	S529.129	Ecosystems and indigenous biodiversity	Rules	Not Stated	PDP rules should actively protect areas where kiwi or indigenous species classed as threatened or at risk (under NZ Threat Classification System) are present. For example, landowners should be required to contact DOC for a trained detection dog or other investigation, and agree with DOC a clear plan to protect vulnerable species, before any vegetation clearance starts. Where appropriate, clearance should be staggered over time, so that indigenous species are able to move to shelter	Insert PDP rule around protection of kiwi or indigenous species
<b>Carbon Neutral NZ Trust (S529)</b>	S529.133	Ecosystems and indigenous biodiversity	Rules	Support in part	A large number of indigenous species are currently classed as threatened or at risk under the national NZ Threat Classification System. <sup>4</sup> About 50 indigenous bird species have become extinct in Aotearoa New Zealand as a result of human activities. <sup>5</sup> Many technical and policy reports have noted that concerted action is required to prevent further deterioration. <sup>6</sup> As noted above, RMA s31(1) applies to decision-making in relation to the use and development of land - District Council functions include 'the control of any actual or potential effects of the use, development, or protection of land, including for the purpose of ... (iii) the maintenance of indigenous biological diversity'. The Regional Policy Statement for Northland and Regional Plan contain a number of	Amend the rules to address RPS s4.4 regarding 'Maintaining and enhancing indigenous ecosystems and species' and 'indigenous taxa that are listed as threatened or at risk'.

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					provisions that refer to aspects of biodiversity that are not about mapped SNAs (Box 1, below, provides examples). As noted above, under s75 of the RMA, the DP is required to give effect to the Regional Policy Statement, and must avoid inconsistency with the Regional Plan. The DP can be more stringent than the RPS, but cannot be more relaxed	
<b>Carbon Neutral NZ Trust (S529)</b>	S529.234	Ecosystems and indigenous biodiversity	Rules	Not Stated	<p>District councils manage the margins of water bodies and the activities that can occur in these areas. Several parts of the National Policy Statement for Freshwater Management 2020 (NPS-FM) give national direction to district councils specifically. The NPS-FM contains objectives and policies to ensure that natural and physical resources are managed in a way that prioritises the health and well-being of water bodies and freshwater ecosystems, the health needs of people (such as drinking water) and the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.</p> <p>The implementation of the NPS-FM and managing freshwater to give effect to Te Mana o Te Wai is primarily the responsibility of the regional council, however clause 3.5(4) specifically requires that every territorial authority includes objectives, policies, and methods in its district plan to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments.</p> <p>Every territorial authority must include objectives, policies, and methods in its district plan to promote positive effects, and avoid, remedy, or mitigate adverse effects</p>	Amend the PDP to give full effect to the NPS - Freshwater Management 2020

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					<p>(including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments.</p> <p>Recent government guidance on the NPS-FM14 (p.8) notes that district plans must be reviewed/amended to give effect to the NPS-FM, including the following aspects:</p> <p>'District plans must be reviewed and, if necessary, amended to give effect to the NPS-FM "as soon as reasonably practicable".</p> <p>'The NPS-FM applies to all freshwater, and Te Mana o te Wai is relevant to all resource management where it affects freshwater, including in city and district planning.</p> <p>'Clause 3.5 Integrated management requires a ki uta ki tai (integrated approach) to give effect to Te Mana o te Wai. It also sets out requirements relevant to city and district councils. This includes encouraging the coordination and sequencing of urban growth, and promoting positive effects and managing adverse effects of urban development on freshwater bodies.</p> <p>'To give effect to Te Mana o te Wai, councils must consider matters such as how urban growth and increases in impervious surfaces will impact on stormwater flows, how stormwater affects the water bodies it is discharged to, and methods to manage urban growth and stormwater discharge. The identification and control of urban growth areas must prioritise the health and well-being of water bodies.'</p>	
<b>Top Energy Limited (S483)</b>	S483.148	Ecosystems and indigenous biodiversity	Notes	Support	Top Energy supports the clear direction provided in the notes of this Chapter regarding how the chapter interacts with others	Retain Notes
<b>Carbon Neutral NZ Trust (S529)</b>	S529.130	Ecosystems and	Notes	Not Stated	PDP rules should actively protect areas where kiwi or indigenous species classed as threatened or at risk (under NZ Threat	Insert an appendix to the PDP to include, or refer to, a protocol that sets out guiding principles and

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
		indigenous biodiversity			Classification System) are present. For example, landowners should be required to contact DOC for a trained detection dog or other investigation, and agree with DOC a clear plan to protect vulnerable species, before any vegetation clearance starts. Where appropriate, clearance should be staggered over time, so that indigenous species are able to move to shelter	procedures for protection of kiwi or indigenous species
<b>Michael John Winch (S67)</b>	S67.003	Ecosystems and indigenous biodiversity	IB-R1	Oppose	<p>I oppose Rule IB-R1/ PER-1 clauses 2, 7, 8 and 12.</p> <p>Clause 2: Dead trees are an important part of an indigenous ecosystem, returning nutrients to the soil and providing food and habitat for insects and fauna that feed on them. The removal of dead trees can result in significant incidental damage.</p> <p>Clause 7 permits vegetation clearance in a Significant Natural Area for the construction of a single residential unit on a title even if there is already suitable cleared land elsewhere on the title. Even if the whole of the title is a SNA, consideration should be given to the location of the dwelling and access to it to minimise the impact on the highest value ecological areas on the site. I accept that it is expected that a single dwelling can be constructed on a freehold title, but consider as a minimum a Controlled Activity resource consent should be obtained to ensure the dwelling minimises adverse effects on the SNA.</p> <p>Clause 8 permits vegetation clearance in a Significant Natural Area for the construction of a single residential unit if provided for in a covenant. My property at Totara North (Allot 25 Parish of Totara) is subject to a QEII covenant that provides for vegetation clearance for a future dwelling, amenity buildings and access to them. The conditions of the covenant require consultation with the QEII Trust on the siting. However, this</p>	Delete Rule IB-R1/ PER-1 clauses 2, 8 and 12.

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					<p>process is outside the Resource Management Act process and may not achieve the purpose of the RMA. On my property, a resource consent would still be required under the Outstanding Landscape provisions of the Plan and this is likely to be the case on other covenanted land.</p> <p>Clause 12 permits vegetation clearance if approved under the Forests Act 1949. The Forests Act does not have the same purpose and principles as the RMA and cannot be expected to deliver the outcomes required under the RMA.</p> <p>Rule IB-R1/ PER-1 is much more permissive than rules protecting outstanding natural features and landscapes (notably NFL-R1 and NATC-R1). RMA Section 6 requires both 'significant indigenous vegetation and significant habitats of indigenous fauna' and 'outstanding natural features and landscapes' to be protected. The Plan should be consistent in their protection.</p>	
<p><b>Michael John Winch (S67)</b></p>	<p>S67.004</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-R1</p>	<p>Oppose</p>	<p>Clause 7 permits vegetation clearance in a Significant Natural Area for the construction of a single residential unit on a title even if there is already suitable cleared land elsewhere on the title. Even if the whole of the title is a SNA, consideration should be given to the location of the dwelling and access to it to minimise the impact on the highest value ecological areas on the site. I accept that it is expected that a single dwelling can be constructed on a freehold title, but consider as a minimum a Controlled Activity resource consent should be obtained to ensure the dwelling minimises adverse effects on the SNA.</p> <p>Rule IB-R1/ PER-1 is much more permissive than rules protecting outstanding natural features and landscapes (notably NFL-R1 and NATC-R1). RMA Section 6 requires both</p>	<p>Delete Rule IB-R1/ PER-1 clause 7 and replace with Controlled and Discretionary Rules as follows:<b>Controlled Activity: Vegetation clearance within a Significant Natural Area to allow for the construction of a single residential unit and essential associated onsite infrastructure and access on a title where there is no existing cleared land suitable for the purpose and the vegetation clearance does not exceed 1,000m2. Matters of control to include location, extent of vegetation clearance,</b></p>

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					'significant indigenous vegetation and significant habitats of indigenous fauna' and 'outstanding natural features and landscapes' to be protected. The Plan should be consistent in their protection.	<b>control of introduced plants and animals (including pets), whether an existing covenant provides for the vegetation clearance, and methods of avoiding or mitigating adverse effects on and protecting the ecological values of the SNA. Discretionary Activity where the Controlled Activity Rule is not complied with.</b>
<b>Lynley Newport (S130)</b>	S130.001	Ecosystems and indigenous biodiversity	IB-R1	Support in part	The submitter supports the provision in IB-R1 of permitted clearance of indigenous vegetation in the circumstances listed in the rule. The submitter particularly supports the inclusion of PER-1 #s 6 & 7, however, considers the threshold applied in #7 to be too restrictive to accommodate a residential unit, on-site services and access.	Amend IB-R1 #7 to read: 7. To allow for the construction of a single residential unit on a title and essential associated on-site infrastructure and access and it does not exceed 2,000m2
<b>Summit Forests New Zealand Limited (S148)</b>	S148.020	Ecosystems and indigenous biodiversity	IB-R1	Oppose	"the removal or clearance from land which was previously cleared and the indigenous vegetation to be cleared is less than 10 years old". This unreasonably discriminates against plantation forestry where, by virtue of rotation lengths in excess of 25 years combined with the requirements for riparian and other setbacks and ecological significance criteria that are so broad as to potentially capture the understory of plantation forests, will force plantation forestry activities into an unnecessary resource consent process to undertake a legitimate rural production activity.	Amend IB-R1 to provide for plantation forestry activities and rotation lengths of 28 to 35 years.
<b>Tane's Tree Trust - Northland</b>	S157.001	Ecosystems and	IB-R1	Support	It is critical that sustainable indigenous forestry activities are not subject to unnecessary additional, costly and uncertain	Retain Point 12 of Rule IB-R1 PER-1 (inferred)

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<b>Totara Working Group (S157)</b>		indigenous biodiversity			resource management consenting processes required by the District Plan. In contrast, appropriate sustainable indigenous forest management activities under the Ministry of Primary Industries (MPI) approved 'Sustainable Forest Management Plans' (SFMPs) need to be encouraged, supported, and explicitly provided for.	
<b>Horticulture New Zealand (S159)</b>	S159.054	Ecosystems and indigenous biodiversity	IB-R1	Support	Clearance for biosecurity purposes is supported.	Retain subsection 4 of Rule IB-R1
<b>Manulife Forest Management (NZ) Ltd (S160)</b>	S160.017	Ecosystems and indigenous biodiversity	IB-R1	Support in part	The submitter supports in part IB-R1 and considers that the NES PF currently provides rules around vegetation clearance including around and in SNAs. This is reflected in IB-R1-PER-1, 13.vii. However, IB-R1 PER-1, 10, by the timeline, excludes plantation forestry due to the forest rotation.	Amend IB-R1-PER1, 10 to allow for the forest rotation of 28 years.
<b>Bentzen Farm Limited (S167)</b>	S167.021	Ecosystems and indigenous biodiversity	IB-R1	Support in part	Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas. Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied. The use of building platform (ie single residential unit) should not matter in assessing its effects relative to Indigenous vegetation. The provision for the use should be conferred from the underlying zoning. A more effective and efficient way to achieve the objective is to simply refer to 'building platforms'. The rule confuses density rules applying to residential units which are specified elsewhere in the Plan. It is appropriate to add further exclusions for 'existing domestic gardens' in recognition that many existing gardens include	Amend rule IB-R1 as follows: Indigenous vegetation pruning, trimming and clearance and any associated land disturbance for specified activities <del>within and outside a Significant Natural Area</del> ... 7. To allow for the construction of a <del>single residential unit on a title</del> <b>building platform</b> and essential associated onsite infrastructure and access and it does not exceed 1,000m ; <b>14. For existing domestic gardens</b> <b>15. It is for ecosystem protection, rehabilitation or restoration works</b>

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					<p>indigenous vegetation. In addition, ecosystem protection, rehabilitation or restoration works should be excluded in recognition that Indigenous vegetation may need to be modified for such purposes, including for access racks for planting and pest control and to release new plants.</p>	
<p><b>Setar Thirty Six Limited (S168)</b></p>	<p>S168.028</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-R1</p>	<p>Support in part</p>	<p>Amendments to the overview section, and the objectives, policies and rules are sought to:</p> <ol style="list-style-type: none"> <li>1. Recognise that the Council has not identified Significant Natural Areas in the Proposed Plan; and</li> <li>2. Clarify that the role of identifying SNAs cannot be passed onto landowners; however areas of significant indigenous vegetation and significant habitats of indigenous fauna may be desirably protected through the consent process.</li> </ol> <p>Without the SNA areas being mapped, the section 32 analysis cannot properly conclude that the associated objectives, policies and rules are most appropriate or efficient or effective methods to protect such areas. Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied. The use of building platform (ie single residential unit) should not matter in assessing its effects relative to Indigenous vegetation. The provision for the use should be conferred from the underlying zoning. A more effective and efficient way to achieve the objective is to simply refer to 'building platforms'.</p> <p>Furthermore, the rule confuses density rules applying to residential units which are specified elsewhere in the Plan. It is appropriate to add further exclusions for</p>	<p>Amend Rule IB-R1 as follows:                      Indigenous vegetation pruning, trimming and clearance and any associated land disturbance for specified activities within and outside a Significant Natural Area                      ...</p> <p>7. To allow for the construction of a <del>single residential unit on a title</del> <b>building platform</b> and essential associated onsite infrastructure and access and it does not exceed 1,000m<sup>2</sup>; <b>14. For existing domestic gardens</b> <b>15. It is for ecosystem protection, rehabilitation or restoration works</b></p>



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					'existing domestic gardens' in recognition that many existing gardens include indigenous vegetation. In addition, ecosystem protection, rehabilitation or restoration works should be excluded in recognition that Indigenous vegetation may need to be modified for such purposes, including for access tracks for planting and pest control and to release new plants.	
<b>NZ Agricultural Aviation Association (S182)</b>	S182.016	Ecosystems and indigenous biodiversity	IB-R1	Support in part	Support the rule that permits the clearance of indigenous vegetation from land which was previously cleared for the purposes of maintaining improved pasture Seek to add Improved Pasture for clarity Oppose any timeframe limitations on the clearance of indigenous vegetation for the purposes of maintaining improved pasture	Insert point 14 in PER-1 - the clearance of regenerating indigenous vegetation for the maintenance of improved pasture Include a definition of Improved Pasture as per previous submission point Amend point 10 in PER-1 -The removal or clearance from land which was previously cleared <del>and the indigenous vegetation to be cleared is less than 10 years old;</del>
<b>The Shooting Box Limited (S187)</b>	S187.021	Ecosystems and indigenous biodiversity	IB-R1	Support in part	Refer to submission for detailed reasons for decision requested relating, but not limited to, the following: reasons provided in the Ecosystems and Indigenous Biodiversity overview section; the use of building platform (i.e. single residential unit) should not matter in assessing its effects relative to indigenous vegetation); the rule confuses density rules applying to residential units; and appropriate exclusions to the Rule.	Amend rule IB-R1 as follows: Indigenous vegetation pruning, trimming and clearance and any associated land disturbance for specified activities <del>within and outside a Significant Natural Area 7. To allow for the construction of a single residential unit on a title</del> <b>building platform</b> and essential associated onsite infrastructure and access and it does not exceed 1,000m <sup>2</sup> <del>14. For existing domestic gardens</del> <b>15. It is for ecosystem protection, rehabilitation or restoration</b>

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						works