



THE PLANNING
COLLECTIVE

4 September 2023

Far North District Council
Proposed District Plan Planning and Policy
Via email: pdp@fndc.govt.nz

Dear Sir / Madam

RE: Further submissions to the proposed Far North District Plan – Turnstone Trust

The attached further submissions are made on behalf of Turnstone Trust Limited (“TT”) – Submitter Number 499 to the proposed Far North District Plan (“pFNDP”).

TT owns the land at 126B Kerikeri Road, colloquially known as the Bing property. The land is directly adjacent to Kerikeri town centre. TT lodged a comprehensive submission to the pFNDP seeking a portion of its 29-hectare landholding be rezoned to Mixed Use, or other appropriate zoning related to the zoning that is applied to the Kerikeri town centre. Turnstone is aware of other submissions that seek a more fine-grained approach is applied to the zoning of the commercial centres in the Far North.

TT seeks that the pFNDP respond clearly to the NPS-UD to direct quality urban and economic outcomes that will benefit the District. To this end TT has an interest in all submission matters relating to Kerikeri commercial and residential areas in relation to zoning, subdivision, and land development. TT considers Kerikeri is an urban environment in terms of the NPS-UD.

The attached Table lists all the submissions that further submissions are made in relation to, the particular parts of the submission KFO supports or opposes and the reasons why.

TT wishes to be heard in support of its further submissions.

Yours sincerely

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Attachments:

- A. -Further Submissions Table.

Further Submission on behalf of Turnstone Trust Limited – 4 September 2023

Sub #	Sub Point	Submitter	Theme	Summary	Decision Requested	Further Submission		
						Support / oppose	Reasons	Decision requested
General Process								
#338	006 - 008	Our Kerikeri Community Charitable Trust	Urban design	Consider the PDP should enshrine the principles/design qualities of the Urban design Protocol etc. Consider that spatial plans should be prepared.	The PDP should include provisions that support urban design principles for quality and innovative developments that cater for mixed use, mixed dwellings, and mixed income levels, whilst protecting and preserving the characteristics of respective townships and the things that communities value.	Support	Implementation of urban design principles is a cornerstone to achieving well-functioning urban environments.	Allow the submission, subject to appropriate drafting FS325.001, FS325.002, FS325.003
#338	013	Our Kerikeri Community Charitable Trust	General process	The Operative DP contains a chapter on development financial contributions (chapter 14). However, some years ago the council eliminated most requirements for development contributions. This has resulted in a large, accumulated shortfall in infrastructure and related funding, and ratepayers are unfairly expected to carry this cost burden.	Amend the PDP to require development contributions when Council has adopted policy on development contributions as part of its Long-Term Plan (Inferred)	Support	Development contributions under the Local Government Act are an appropriate mechanism. While development contributions are generally dealt with under separate policy instruments, it may be appropriate to include reference to development contributions in the pFNDP.	Allow the submission, subject to appropriate drafting FS325.004
#428	003	Kapiro Residents Association	General process	The PDP fails to address the urgent need to reduce greenhouse gas emissions wherever possible now and fails to adequately avoid or mitigate the anticipated effects.	Amend PDP to include policies/rules/standards that will reduce greenhouse gas emissions related to the activities covered by district plans.	Support	TT supports including provisions that encourage quality, compact urban form. The TT submission assists in achieving a quality compact urban form for Kerikeri	Allow the submission, subject to appropriate drafting FS325.005
#449	003	Kapiro Conservation Trust	General process	We support intensification of the urban area. However, intensification needs to be carefully planned, with good design principles, appropriate infrastructure and adequate green open spaces for the community. Subzones or precincts (or whatever terms are now required by the National Planning Standards) need to be identified to achieve good connectivity, good functionality and protect character and amenity values. Subzones are needed to ensure that building height and density are reduced in a graduated manner moving out from the central area to high density residential areas and then lower density residential areas. Policies/rules are also needed to avoid pepper-potting multi-storied buildings in diverse locations in random fashion. Within close distance to Kerikeri township, there are limited opportunities to develop greenfield land for future growth. We consider that the PDP zoning, at present, does not focus on greenfield sites that are more appropriate for future growth, taking into account potential for infrastructure, connectivity, traffic, and other issues.	Amend the zoning framework to introduce more subzones or precincts as per the National Planning Standards to achieve good connectivity, good functionality and protect character and amenity values.	Support	Given anticipated growth in the Kerikeri the pFNDP zoning needs to recognise the opportunities provided by greenfield and zoned but not yet developed sites such as the TT land which provide significant opportunity for efficient and quality urban outcomes.	Allow the submission FS325.006

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#465	001	Groundswell NZ	General process		Seek to pause the district plan process until the failings of the RMA outlined in this submission are addressed, and there is clarity around the NPS Indigenous Biodiversity and the RMA replacement the Natural and Built Environment Act (NBA). If this is not accepted, then our submission would be the sections relating to the zoning issues above be paused or removed altogether.	Oppose	Delaying the preparation of the second-generation District Plan is neither an efficient nor effective response to the submitters concerns around the NPS-IB or reform of the RMA.	Reject the submission FS325.007
#524	001	Vision Kerikeri	General process	Support planned growth as this helps ensure efficient and effective infrastructure, and connectivity. While it is acknowledged that there are no current growth strategies or structure plans, some are in development, and could be completed prior to the PDP being made Operative. To ensure that these strategic documents can be given effect and implemented once approved by Council, provisions and assessment criteria that hold a space for these planning documents should be included.	Continue to develop spatial and strategic direction for the District's urban centres and include place holding provisions throughout the plan	Support	The pFNDP should give effect to and implement strategic documents addressing planned growth for reasons including that adequate infrastructure must be in place to support development.	Allow the submission FS325.008
#529	003	Carbon Neutral NZ Trust	General process	We support intensification of the urban area for the reasons outlined in our previous submissions and discussions with council. However, intensification needs to be carefully planned, with good design principles, appropriate infrastructure and adequate green open spaces for the community. Sub zones or precincts (or whatever terms are now required by the National Planning Standards) need to be identified to achieve good connectivity, good functionality and protect character and amenity values. Subzones are needed to ensure that building height and density are reduced in a graduated manner moving out from the central area to high density residential areas and then lower density residential areas. Policies/rules are also needed to avoid pepper-potting multi-storied buildings in diverse locations in random fashion.	Amend the zoning framework to introduce more subzones or precincts as per the National Planning Standards to achieve good connectivity, good functionality and protect character and amenity values.	Support in part	TT supports including additional zones or precincts where that is appropriate to provide a specific response to a particular site.	Allow the submission FS325.009
#559	001	Te Runanga o Ngāti Rehia	General process	Urban Sustainability and Affordable Infrastructure are of interest to Ngāti Rehia, including better management of urban infrastructure, land and building resources to reduce wasted and insufficient use of existing land and infrastructure resources that increase the living costs. The studies alongside affordable housing options, would assist in meeting SD-UFD-01.	Amend to prioritise working with Ngāti Rehia and the hapū of Kerikeri Waipapa on cultural and historical heritage inventories to be initiated as an integral part of this plan.	Support	TT supports the need to better manage urban infrastructure.	Allow the submission. FS325.0010

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#560	004	Jane Johnston	E General process	There is a need to provide for accommodation that is affordable and accessible to work, education and recreation opportunities. Accommodation as per the PDP fails to provide for young adults (new entrant workers or students), as well as for the home-alone elderly. The PDP does not cater to all options or 'potential' choices for people throughout their life-cycle, in being heavily biased towards providing for 'families' rather than for individuals or other groups who may choose to want to cohabitate. The requirements of a minimum size of section, a cap on the number of units able to be accommodated per section, outdoor living space and yard to boundary rules prohibit high density residential accommodation, without a relationship with 'commercial' use as provided for in the mixed-use zone.	Insert a new high density residential zone which provides choice at the opposite end of the continuum from 'rural-residential', 'rural lifestyle' and 'coastal-living' as per the operative plan and does not require a commercial ground floor level.	Support	TT supports the proposal to include additional housing choice by providing for high density dwellings in appropriate location.	Allow the submission, subject to appropriate wording FS325.011
General Plan Content								
#138	021	Kairos Connection Trust and Habitat for Humanity	General plan content	To further improve housing choices for low-moderate income households in the Far North and in addition to the amendments sought in the submission, seek that the Council consider including a separate Inclusionary Housing chapter, or integrate throughout proposed subdivision and residential and mixed use zone chapters, provision for inclusionary housing that would require a 5% share of the estimated value of the sale of subdivided lots (or as appropriate to the Far North context) to a nominated CHP to ensure the establishment of affordable housing within its high growth urban environments. The appropriate % share of lots would need to be determined for the Far North District, as it would essentially be a financial contribution condition for which a district plan policy is required under Section 108 (10).	Insert a separate Inclusionary housing chapter or integrate throughout proposed subdivision and residential and mixed use zone chapters, provision for inclusionary housing that would require a 5% share of the estimated value of the sale of subdivided lots (or as appropriate to the Far North context) to a nominated community housing provider to ensure the establishment of affordable housing within its high growth urban environments.	Oppose	TT does not support the proposed inclusionary housing mechanism. No assessment has been provided of the costs and benefits of such a scheme in the Far North District to support an understanding of whether the proposal is the most appropriate way to achieve the purpose of the RMA or the objectives of the pFNDP.	Disallow the submission FS325.012
#215	052	Haigh Workman Limited	General plan content	Inconsistencies in stormwater rules	Insert a new chapter to the General District-Wide Matters addressing Stormwater Management (or Impermeable Surfaces generally) including overview, objectives, policies and rules in a similar way to the section on Earthworks management	Support	TT supports the intent of including a new chapter that improves the clarity and usability of the pFNDP by grouping provisions relating to stormwater management in a single place.	Allow the submission FS325.013
#252	006	Hall Nominees	General plan content	The Mixed Use Zone is not the most appropriate zone for Kerikeri town centre for the following reasons: a. The Mixed Use Zone does not give effect to objective 1 and policy 1 of the National Policy Statement on Urban Development (NPS-UD);	Amend the suite of commercial zones proposed and rezone Kerikeri town centre to Town Centre Zone (or similar commercial zone) that appropriately reflects commercial development and activities within Kerikeri township; OR	Support	TT supports the intent of the submission to provide greater flexibility for development in the Kerikeri town centre. TT agrees with the submitter that Kerikeri and Waipapa comprise an urban environment that must give effect to the NPS-UD.	Allow the submission, subject to appropriate wording. FS325.014

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				<p>b. The Section 32 Evaluation - Urban Environments incomplete and flawed:</p> <p>i. The evaluation does not provide sufficient level of detail that corresponds to the scale and significance of due to the importance of the zone being the only commercial zone proposed within the District;</p> <p>ii. The evaluation fails to consider the full range of commercial zoning options and identify reasonably practicable options to achieve objectives;</p> <p>iii. The evaluation fails to evaluate appropriate zone criteria and boundaries;</p> <p>c. The PDP does not provide strategic direction or policy support for the suite of urban zones proposed;</p> <p>d. The Mixed Use Zone provisions do not sufficiently enable a range of commercial activities.</p> <p>The PDP does not provide alternative commercial zones, providing only a Mixed-Use Zone. The Section 32 Evaluation - Urban Environment does not provide any justification for this approach nor does it evaluate options utilising the full range of National Planning Standard commercial zones. The PDP does not include any form of direction by way of mapping or provisions to set a clear hierarchy of centres. This lack of strategic direction will hinder the ability to achieve a sustainable and compact urban form.</p> <p>The approach to commercial zoning within the PDP has resulted in the inability to utilise the Mixed Use Zone as intended by the National Planning Standards. This approach has led to ineffective and inefficient methods in the PDP, which does not provide for the sustainable development and use of business land.</p>	If above relief is not accepted, amend the Mixed Use zone provisions to provide for an increased range of commercial and community activities.			
#339	016	Te Aupōuri Commercial Development Limited	General Plan Content	<p>The Strategic Direction chapters do not contain policy which gives effect to proposed objectives. TACDL considers that there is no clear policy direction to give effect to the proposed objective which could lead to an ineffective plan.</p>	<p>Amend the Strategic Direction Chapter to:</p> <ul style="list-style-type: none"> • Provide clear direction for growth and development throughout the Far North District. • Include appropriate policy to give effect to strategic direction objectives. • Evaluate objectives in accordance with section 32AA to confirm that these are the most appropriate objectives. 	Support subject to the nature of changes proposed to address the submission	Definitions and nesting tables can change the outcomes of what things mean. The strategic direction and request to include policy to give effect to the strategic direction objectives could have flow down effects on other plan provisions.	<p>Allow the submission, subject to appropriate wording.</p> <p style="text-align: right;">FS325.015</p>
#344	001	Paihia Properties	Entire Plan	<p>The PDP does not include any form of direction by way of mapping or provisions to set a clear</p>	<p>Establish a centre hierarchy to set a clear policy direction for the larger urban areas within the</p>	Support in principle	<p>There are a range of centres in the Far North that fulfil different functions. It is important for the</p>	<p>Amend Plan to provide an appropriate hierarchy of centres.</p> <p style="text-align: right;">FS325.016</p>

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		Holdings Corporate Trustee Limited and UP Management		hierarchy of centres. There is no identification of small, medium or large centres. PPHCTL consider this lack of strategic direction and centres hierarchy to be a significant flaw in the plan that will hinder the ability to achieve a sustainable and compact urban form.	District and amend provisions and zoning as necessary to implement the hierarchy that achieves a compact urban form.		future vitality and sustainability of the various centres that there are appropriate provisions in the Plan to guide development and achieve optimal urban outcomes, including outcomes that support the wider communities.	
#356	009	Waka Kotahi		Consider adding new objectives: - to support good urban design including good accessibility for all people between housing, jobs, community services, recreational spaces, including by way of active and public transport where practicable; - the provision of a range of zones to meet the demands of the district and support wellbeing;	Insertion of new objectives to address: - good urban design, including good accessibility for all people between housing, jobs, community services, recreational spaces, including by way of active and public transport where practicable; and - provision for a range of zones to meet expected demand for the district and to support wellbeing.	Support	TT supports the intent of the submission to support achieving good urban design and accessibility, subject to appropriate wording.	Allow the submission, subject to appropriate wording FS325.017
#364	005	Director General of Conservation	Amendment requested	Give effect to the NPS IB	Update the Proposed District Plan to be consistent with the NPSIB exposure draft. Specifically, but not limited to: <ul style="list-style-type: none"> Protect SNAs and identified taonga on Māori lands in line with clause 3.18 of the NPSIB exposure draft. Include objectives, policies, or methods in the PDP for managing the adverse effects of new subdivision, use, and development on highly mobile fauna areas. Incorporate NPSIB Appendices 3 and 4 or like principles into the PDP. Update proposed Policy IB-P4 to require that any biodiversity offset, or biodiversity compensation be in accordance with these principles. Any other amendments that may be necessary or appropriate to address my concerns. 	Support in part, subject to the nature of changes proposed to address the submission	The submission refers to the exposure draft of the NPS-IB, which has been superseded. While some amendments may be appropriate to give effect to the NPS-IB within the scope of the pFNDP and submissions, it may not be possible to fully implement the NPS-IB given the pFNDP and submissions predated the NPS-IB.	Allow the submission in part, subject to appropriate wording and or any mapping changes. FS325.018
#368	005	Far North District Council	Ecosystems and Indigenous Biodiversity	The District Plan has to give effect to National Policy Statements.	All amendments necessary to give effect to the National Policy Statement Indigenous Biodiversity (NPS IB).	Support in part, subject to the nature of changes proposed to address the submission	While some amendments may be appropriate to give effect to the NPS-IB within the scope of the pFNDP and submissions, it may not be possible to fully implement the NPS-IB given the pFNDP and submissions predated the NPS-IB.	Allow the submission in part, subject to appropriate wording and any mapping changes. FS325.019
Definitions								
#271	003	Our Kerikeri Community Charitable Trust	Definitions	Development Infrastructure: Support the definition of Development Infrastructure noting that the definition of Land Transport includes transport on land by any means and the infrastructure that facilitates it which would include cycling networks.	Retain definition as drafted	Support	The definition as drafted is appropriate.	Allow the submission FS325.020
#271	005	Our Kerikeri Community Charitable Trust	Definitions	Integrated Transport Planning: This is a term that is used often throughout the PDP but is not defined. The principal of integrated transportation networks is supported, and it is considered useful to have this term defined to ensure that it is clear to plan users what is meant.	Include definition for 'Integrated transport network'.	Support	TT supports the proposal to clarify what is intended by an integrated transport network.	Allow the submission, subject to appropriate wording FS325.021

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				The definition should include enforce the importance of connectivity, and multi modal transport options.				
#359	037	Northland Regional Council	Definitions	Three waters infrastructure	The definition only applies (as drafted) to council owned infrastructure. We would suggest future-proofing this given the three waters reform as these services are likely to be owned and operated by 'three waters water entities' in the medium term (potable, wastewater and stormwater systems). The definition should consider those used in the Water Services Bill and refer to networks available for connection to private property. This definition needs to be considered carefully in light of the rules which then apply, for example CE-P5.	Support	The amendment provides appropriate clarification and future-proofs the definition against likely changes to local government services.	Allow the submission FS325.022
#368	002	Far North District Council	Definitions	Impermeable surface	Correct the definition to state 20m ² rather than 2m ² .	Support	The submission seeks to correct an obvious error, which is appropriate.	Allow the submission. FS325.023
#561	008	Kāinga Ora	Definitions	Multi-unit development can be in the form of detached units and attached units and a separate definition is not required.	Delete definition of multi-unit development.	Support	TT agrees that multi-unit development can include attached and detached units	Allow the submission FS325.024
Support Planned Growth								
#271	001	Our Kerikeri Community Charitable Trust	Support planned growth	Support planned growth as this helps ensure efficient and effective infrastructure, and connectivity. While it is acknowledged that there are no current growth strategies or structure plans, some are in development, and could be completed prior to the PDP being made Operative. To ensure that these strategic documents can be given effect and implemented once approved by Council, provisions and assessment criteria that hold a space for these planning documents should be included.	Continue to develop spatial and strategic direction for the District's urban centres and include place holding provisions throughout the plan.	Support	The pFNDP should give effect to and implement strategic documents addressing planned growth.	Allow the submission FS325.025
Urban form and development								
#356	005 & 009	Waka Kotahi	Urban form and development	Amend objectives to provide more clarity of how it might be implemented.	SD-UFD-01 is unclear consider deleting the objective or amend to provide more clarity and certainty perhaps more in line with NPS-UD Objective 1.	Support in principle	It is imperative that the Plan sets out clear objectives with clear supporting policies directing how the objectives are to be achieved.	Allow the submission, subject to appropriate wording. FS325.026, FS325.027
#561	018	Kāinga Ora	Objectives	Add new objective SD-UFD-05	SD-UFD-05 Enable higher residential intensification in the area within moderate walking distance around Kerikeri Town Centre.	Support in principle	TT agrees that intensification should be provided for within walkable catchments to town centres.	Allow the submission. FS325.028
District Wide Matters								
#359	005 - 009	Northland Regional Council	Climate Change	We suggest a greater emphasis on response to climate change. There are climate change mitigation and adaptation responses relevant to district planning that could be set out now. We support the greater use of mixed-use zones and enabling greater density in urban centres	7.3 We would suggest strategic direction on climate change include: a) A clear statement on how the district plan enables the district's communities to respond to climate change (eg. an objective could be framed along the lines of "Far North District communities are	Support subject to the nature of changes proposed	TT supports the intent of providing direction that provides a clear statement of how communities will respond to climate change.	Allow the submission, subject to appropriate wording. FS325.029 - FS325.033

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				<p>subject to appropriate requirements for water resilience and minimising risk from natural hazards.</p>	<p>prepared for the impacts of climate change and an equitable transition to a low emission economy”, and policies could include: “Provide for development patterns that are resilient to climate change impacts” and “Support the inclusion of design features that take into account the impacts of climate change and the need to transition to a low-carbon economy in proposals for land use, subdivision and development”).</p> <p>b) Signal that zoning, overlays and controls on subdivision, use and development are used to minimise risk from natural hazards, protect high value resources that enable climate change responses or are particularly vulnerable to predicted impacts (such as indigenous biodiversity, elite soils and renewable energy generation). They also promote development patterns and land uses and associated transport / infrastructure that enable emissions reduction (such as mixed-use zoning, higher residential density in serviced areas, renewable energy generation and special purpose zoning such as horticulture).</p> <p>7.4 We recommend that land use provisions be tested to ensure there are no undue impediments to climate change mitigation (eg. amenity-based rules on ‘reflectivity’, building height or similar that unduly limit opportunities for small to medium scale solar or wind generation).</p> <p>7.5 We also note the actions set out in the Te Taitokerau Climate Adaptation Strategy. These actions should guide development of climate change provisions within the new district plan.</p> <p>7.6 Recent updates from the Ministry for the Environment indicate that sea level is rising faster than anticipated. The Proposed Plan should therefore consider the potential for updating of NRC hazard maps and working with NRC to reflect new understanding of the issue.</p>			
#359	010 - 012	Northland Regional Council	Resilient and Reliable Water Supply	<p>Resilient and reliable water supply is another key issue now and in the long term as climate change effects increase.</p> <p>Water resilience is a particular concern for the Far North district, as was highlighted in the 2019/2020 drought that exposed the vulnerability of existing supplies, primarily those that rely on ‘run of river’ and are highly unreliable during extended dry periods. We suggest this be embedded in the relevant sections of the strategic direction chapter. We</p>	<p>We suggest signalling high intensity development will not be enabled unless serviced by a supply network or adequate on-site storage is provided to cater for extended dry spells / droughts.</p>	Support subject to the nature of changes proposed	TT supports the intent of the submission, subject to appropriate wording being provided.	<p>Allow the submission, subject to appropriate wording</p> <p style="text-align: right; color: red;">FS325.034, FS325.035, FS325.036</p>

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				note drought is included in the District Wide Matters section on Hazards and Risks but feel the significance of these issues could be more strongly highlighted. We note droughts have been assessed to have economic impact six times higher than floods – this impact will only be compounded where development is enabled without adequate water supply.				
#421	161, 162, 163	Northland Federated Farmers		Federated Farmers supports objectives PA-O1 and PA-O2 as they are currently drafted in the proposed district plan. However, there is a need for an additional objective to be included that provides recognition for private property rights as well as the additional impacts public access may also have on the amenity value of selected landscapes and areas. The landowner's private property rights are a key area of focus which needs to be considered within this chapter.	Federated Farmers seeks the following relief: (a) the retention of objectives PA-O1 and PA-O2 as currently drafted with wording to similar effect; and (b) the addition of a new objective PA-O3 that reads as follows: <u>Practical and safe public access to and along the margins of lakes and rivers and the coastal environment is provided in a way that respects private property and does not result in adverse effects on natural character, landscape, indigenous biodiversity, historical heritage, or cultural values.</u> or wording to similar effect; and (c) any consequential amendments required as a result of the relief sought.	Support	TT supports the submission, including the proposed amendment to reflect that there are some areas of public land adjoining waterbodies.	Allow the submission FS325.037, FS325.038, FS325.039
Strategic Direction								
#271	006	Our Kerikeri Community Charitable Trust	Strategic Direction	Integrated transport planning is a critical component to ensuring a coordinated response to land use development and good urban design outcomes. As noted earlier, it is considered that this is difficult to implement when strategic and spatial direction is lacking as the opportunity for triggers at development stage is missed and it is sought that place holders are included throughout the plan to hold a place for the development of such documents (noting that the Transport Strategy does not appear to currently spatially identify any future transport networks). Without such guiding documents, it is unclear how the outcome sought by SD-EP-O4 will be achieved, particularly given that there are no policies associated with these objectives. Encouraging multi modal transport (e.g. cycling, walking and public transport), as a critical element to social and economic well-being. Accordingly, the following amendment to SD-EP-O4 is sought.	People, businesses and places are connected digitally and through <u>multi modal</u> integrated transport network	Support	TT supports an integrated transport network that will be multi-modal (i.e., providing for private vehicles, busses, cyclists and pedestrians).	Allow the submission FS325.040
#271	007	Our Kerikeri Community Charitable Trust	Strategic Direction / Economic and Social	Without policies, it is difficult to understand how the Strategic Direction is intended to be implemented throughout the plan. With specific regard to integrated transport networks, a policy is sought that provides this direction, and wording suggested.	Insert corresponding policy to SD-EP-O4 regarded integrated transport networks : SD-EP-PXX To ensure multi modal integrated transport networks by:	Support in part	TT supports the proposal subject to the following: 1. There will also need to be corresponding rules and supporting assessment criteria. 2. There should be specified triggers for this requirement as a subdivision involving	Allow the submission in part FS325.041

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			Wellbeing / New policy		<ul style="list-style-type: none"> a. Requiring Integrated Transport Assessments at the time of subdivision. b. Ensuring that provision for planned integrated transport networks is made at the time of development. c. Funding for integrated multimodal transport networks is identified in the Long Term Plan 		<ul style="list-style-type: none"> only 1 or 2 additional lots is unlikely to warrant this requirement. 3. There are other methods that should be employed to secure this outcome for smaller scale developments without the need for a full ITA e.g., Council's Subdivision Standards, Structure Plans secured in the Plan through Precincts to give statutory weight for example. 	
#271	008	Our Kerikeri Community Charitable Trust	Strategic Direction / Urban Form and Development / New Objective and Corresponding Policy	The District urban centers have been ad hocly developed, in most cases resulting in poor urban design outcomes. This chapter provides the first opportunity for a 'top down' approach to ensure that this is not the case going forward and that integrated development resulting in good urban design outcomes is achieved. The objective in this chapter does this to an extent, but an additional objective should be included that expressly identifies the importance of urban design in insuring good urban form and development. See suggested wording for new objective and corresponding policy.	<p>Insert an additional objective and policy that acknowledges the importance of urban design in achieving integrated development and good urban form and development outcomes.</p> <p>SD-UFD-OX Urban growth and development is high quality and responds positively to the local context and outcomes expected for the zone.</p> <p>SD-UFD-PX To manage change in urban environments by ensuring a high level of amenity through quality urban design by:</p> <ul style="list-style-type: none"> a. Identifying areas where active frontages are required to support a vibrant and pedestrianized environment b. Requiring development in urban centers to show how they will contribute to a connected, distinctive attractive, appropriate, sustainable and safe urban form. c. Ensuring that development responds to local context, including through alignment with relevant spatial or strategic document. 	Support	TT supports new provisions targeted at achieving good urban design outcomes.	<p>Allow the submission.</p> <p style="text-align: right; color: red;">FS325.042</p>
Transport								
#271	009 & 010	Our Kerikeri Community Charitable Trust	Transport	In general, our group seeks to ensure that Council and Developers are required to ensure that land use and development considers transportation effects beyond the site. That cul-de-sac roads are generally discouraged unless provision has been made for future connectivity, and that multi modal transport planning is encouraged.	<p>Seek changes to provisions within the plan that direct a high level of connectivity, integrated land use and transport planning, and multi modal transport networks.</p> <p>Amend TRAN-O3 as follows: Land use and development planning, and transport planning all modes of transport are integrated so that the to ensure an efficient pattern of land use and transport networks that are transport network is, safe, efficient and well-connected.</p> <p>Or Add new policy that specifically addresses integrated land use and transport planning. Amend TRAN-O5 as follows: The transport network provides for the safe and efficient movement of vehicular, cycle and pedestrian traffic, and that also meets the needs of persons with a disability or limited mobility.</p>	Support in part	TT supports the intent of the proposed amendments, subject to considering the most appropriate wording.	<p>Allow the submission, subject to appropriate wording.</p> <p style="text-align: right; color: red;">FS325.043, FS325.044</p>
#271	012 & 023	Our Kerikeri Community	Transport	Support acknowledgment of Twin Coast Trail and future cycling pathways, particularly where they contribute to connectivity. Seek inclusion	<p>Establish and maintain a transport network that:</p> <ul style="list-style-type: none"> a. provides safe efficient linkages and connections; 	Support	TT supports the amendments for the reason given in the submission.	Allow the submission

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		Charitable Trust		<p>of multi modal transport options to ensure social and economic wellbeing of our communities, and to respond to climate change. See suggested amended change to better reflect this.</p>	<p>b. avoids and mitigates adverse effects on historical, cultural and natural environment values to the extent practicable; c. recognises the different functions and design requirements for each road classification under the most current National Transport Network classification system; d. supports reductions of greenhouse gases from vehicle movements <u>including through implementation or multi modal transport options</u>; e. considers the likely current and future impacts of climate change when new sections of the network are proposed or existing sections upgraded; and f. provides for existing and future pedestrian and cycling pathways <u>that are well connected</u>, including the Pou Herenga Tai Twin Coast Cycle Trail.</p> <p>Encourage new land uses <u>and development</u> to support an integrated <u>and well connected</u> and <u>diverse multi modal</u> transport network by: a. Requiring consideration of promoting alternative transport modes <u>at the time of land use and development</u>; b. <u>Ensuring that the construction of new transportation infrastructure aligns with relevant spatial or strategic document</u> c. <u>Encouraging</u> the provision of safe and secure parking facilities for bicycles and associated changing or showering facilities for staff; d. <u>Requiring</u> allocation of parking facilities for motorcycles, mobility scooters, car share vehicles, pick up/drop off areas for ride share services and charging stations for electric vehicles; and e. supporting the establishment and operation of accommodation and tourism related activities in close proximity to the Pou Herenga Tai Twin Coast Cycle Trail, provided reverse sensitivity effects can be avoided.</p>			<p>FS325.045, FS325.046</p>
#271	013	Our Kerikeri Community Charitable Trust	Transport	<p>TRAN-R2 PER -1 allows private accessways where there is a maximum of 8 household equivalents (80 vehicle movements), where this cannot be achieved resource consent is required as a discretionary activity.</p>	<p>Amend TRAN-R2 to clarify that where TRAN-PER 1 cannot be complied, a public road that complies with TRAN-S4 is required to be vested in Council, or Discretionary resource consent required.</p>	Support in part	<p>TT supports the submission, subject to considering the wording. The activity status should also change to Restricted Discretionary as the relevant matters for assessment will be restricted to transport connections, safety, amenity, the viability of a public road, engineering construction matters.</p>	<p>Allow the submission in part</p> <p>FS325.047</p>
#271	017	Our Kerikeri Community Charitable Trust	Transport	<p>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</p>	<p>Amend to:</p> <ul style="list-style-type: none"> 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, as a minimum in regard to TRAN-S4.2 The following 	Support in part	<p>TT supports the proposal that there are clear standards for the development of roading infrastructure. It is appropriate that there is the opportunity to seek resource consent for departures from standards.</p>	<p>Allow the submission in part</p> <p>FS325.048</p>

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				design outcomes, and are currently a favoured position of developers due to the lower costs associated.	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.			
#368	018	Far North District Council	Transport	Requirements for road design.	Seeks to add FNDC Engineering Standards April 2022 to matters of discretion.	Support in part	TT supports the intent of the amendment, subject to appropriate matters of discretion that include alternatives that provide a safe and appropriate transport outcome.	Allow the submission in part FS325.049
Zoning								
#271	033	Our Kerikeri Community Charitable Trust	Commercial and Mixed Use Zones - General	In general, it is sought that good urban design outcomes are encouraged in the urban centers throughout the District. However, given that only one commercial zone has been picked from the available options (Mixed Use Zone), this provides limited ability to really target this in a meaningful way. Accordingly, in general more targeted zoning in the urban centers is sought. Further it is considered that the development of urban design guidelines and reference to the guidelines in any Commercial Zone would help to clearly direct good urban design outcomes.	Seek that Council introduce additional commercial and mixed-use zones to better manage the larger urban centers (such as Kerikeri) and develop a set of urban design guidelines to be referenced.	Support	TT supports the proposal to establish different commercial zones to respond to particular issues in particular centres. Subject to appropriate drafting, a more nuanced zone for the Kerikeri town centre may be appropriate.	Allow the submission, subject to appropriate wording FS325.050
#271	036 & 038	Our Kerikeri Community Charitable Trust	MUZ-P5	Seek the following additions to ensure good urban design outcomes that a requirement to consider alignment with urban design guidelines (see earlier point seeking that Council develops some) be included as a matter in this policy.	Seek the following amendments: Manage land use and subdivision 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. consistency with the scale, density, design, amenity and character of <u>the surrounding</u> mixed use environment, <u>and with the urban design guidelines</u> ; b. the location, scale and design of buildings or structures, outdoor storage areas, parking and internal roading; c. at zone interfaces: i. any setbacks, fencing, screening or landscaping required to address potential conflicts; ii. any adverse effects on the character and amenity of adjacent zones; d. the adequacy and capacity of available or programmed development infrastructure to accommodate the proposed activity; including: i. opportunities for low impact design principles; ii. management of three waters infrastructure and trade waste;	Support	TT supports the concept of achieving good urban design outcomes. However, any urban design guidelines would need to be carefully considered and appropriately drafted.	Allow the submission, subject to appropriate wording FS325.051, FS325.052

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					<p>e. managing natural hazards;</p> <p>f. the adequacy of roading infrastructure to service the proposed activity;</p> <p><u>g. alignment with any strategic or spatial document;</u></p> <p><u>h. provisions made to ensure connectivity;</u></p> <p>i. any adverse effects on historic heritage and cultural values, natural features and landscapes or indigenous biodiversity, and</p> <p>j. any historical, spiritual, or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6.</p>			
#359	013 - 022	Northland Regional Council	Zoning	<p>9.3 Enabling further development in areas prone to flooding is at odds with direction in the RPS Policy 7.1.2 (New subdivision and land use within 10 year and 100 year flood hazard areas) and Method 7.1.7 – in particular method 7.1.7(6).</p> <p>9.4 In summary, these RPS provisions seek to avoid an increase in risk and discourage subdivision, built development and storage of hazardous substances in hazard zones – especially where rezoning land to more intensive use in hazard prone areas is proposed. It can also create demand for flood mitigation schemes/works over a comparatively large area which is expensive and can create affordability issues.</p> <p>9.5 Further to the above, any such re-zoning without three waters infrastructure is also an issue in the long term – retrofitting networks to service such sites can be problematic and more costly than establishment at the ‘greenfield’ stage. This is especially so where existing development has already established on-site services (eg. wastewater disposal and water storage) but would need to pay to connect to new network services. Without access to appropriate servicing there are major limitations on the density and type of urban development which can be accommodated in these zones.</p>	We suggest ensuring the extent of the new zoning that provides for intensification avoids areas prone to natural hazards unless the change reduces vulnerability to risk.	Support	TT further submits that greenfield development is a more appropriate and more cost-effective way of meeting housing demands. Retrofitting networks to service infill development can be problematic and costly, particularly where existing development has already established infrastructure.	<p>Allow submission</p> <p>FS325.053 - FS235.062</p>
#368	006	Far North District Council	Mixed Use	The Plan needs to consider a minimum net internal floor area for residential units in the Mixed Use zone, similar or the same as for the General Residential zone for residential activity (multi-unit development).	Apply an internal floor area.	Support	TT supports the management of internal floor area to ensure that dwellings in the MUZ are of an appropriate size to provide a quality living environment.	<p>Allow the submission, subject to appropriate wording.</p> <p>FS325.063</p>
#560	004	Jane Johnston	Residential Section	I oppose the creation of just one ‘general residential’ zone with a minimum size of section, and a cap on the number of units able to be accommodated per section, and with	Provide a high density residential zone, in its own right – without the necessity to have a ‘commercial’ ground floor level (as per the mixed-use zone). All townships ought to have a proportion of future	Support	TT supports intensification in appropriate locations to support vitality in the key commercial areas of the District.	<p>Allow the submission, subject to appropriate wording.</p> <p>FS325.064</p>

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				requirements for outdoor living space, and yard to boundary rules. That requirements prohibit high density residential accommodation, without a relationship with 'commercial' use as provided for in the mixed-use zone. There is also a need to allow (provide) for, accommodation that is affordable and accessible to work, education and recreation opportunities. Accommodation as per the Proposed plan fails to provide for young adults (new entrant workers or students), as well as for the home-alone elderly. The Proposed DP does not cater to all options or 'potential' choices for people throughout their life-cycle, in being heavily biased towards providing for 'families' rather than for individuals or other groups who may choose to want to cohabitate. Please cross reference to my submission point with respect to "mixed-use" zone	housing able to accommodate young single adults, and single elderly – accessible to services, and not requiring individual car-parking spaces or personal 'outdoor living' areas.			
#560	005 - 007	Jane Johnston	E Mixed Use	I oppose the extent of the area to be zoned "mixed-use". The area provided for in every township where this new zone is proposed to be introduced is too extensive, and it will hamper the development of much needed affordable accommodation by requiring a glut of unneeded 'commercial' space at ground floor level. Meanwhile insufficient 'industrial' space has been envisaged as catering to 'warehousing' which requires a lot of vehicle movements (as delivering as made both two and from the warehousing/storage nodes). In particular I highlight Kerikeri – where a huge area has been proposed to be rezoned as 'mixed use'—while also acknowledging (with the S32 reports) that there is sufficient commercially zoned land in the vicinity (at Waipapa, for example). The infrastructure has not yet been secured to cater for the vast development envisaged (potential released) by this PDP. I note an absence of FNDC notices of requirement within the notified PDP to ensure transportation networks and other essential infrastructure will be developed alongside or prior to releasing land to this extensive redevelopment potential) to cater for the vast development envisaged (potential released) by this PDP.	Reduce the area covered by the proposed mixed use zone, by at least a half – to 2/3ds. And allow for high density residential living, without the encumbrance of having to also provide for commercial use. The mixed-use areas should also not be contiguous – they ought to be established as nodes, to allow for precincts of like activities to emerge – and to allow for separation of travel and flow between nodes. Consider providing for mixed use either edge of Kerikeri for example, with areas of high-density residential in between.	Support in part	TT agrees that there needs to be careful mapping as to the extent and location of Mixed Use zoning and if the town centre zoning is to change any Mixed Use zoning needs to carefully respond to the town centre zoning to ensure a well-functioning urban environment is achieved.	Disallow the submission subject to wording of any provisions and mapping. FS325.065, FS325.066, FS325.067
#561	079	Kāinga Ora	Kerikeri Town Centre	Kāinga Ora seek a new Town Centre zone for Kerikeri in recognition of its importance as a	That MUZ-01 be retained as notified with the introduction of a Town Centre zone for Kerikeri.	Oppose	TT supports a more appropriate zoning for Kerikeri town centre than the Mixed Use Zone subject to	Disallow subject to more detailed / fine grained planning – potentially a Precinct to

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				growing centre in the Far North. The zone provisions enable buildings of up to 6 storeys (22m maximum height) and also provide for ground floor residential activity except where a pedestrian frontage is identified (aligning with that currently shown on the planning maps, other than where amended in Kaikohe). See Appendices 3 and 5.			appropriate provisions that reflect the character and environmental characteristics of Kerikeri. TT does not support a maximum building height of 22 metres for all of Kerikeri town centre and considers that more fine-grained planning should be undertaken to identify locations suitable for higher buildings to ensure town centre amenity is maintained. This includes wind tunnel and other amenity effects.	identify suitable locations for higher buildings. Support other changes subject to wording and changes sought. FS325.068
#561	066 - 068	Kāinga Ora	Kerikeri Medium Density Housing zone	Kāinga Ora supports these objectives and policies as they relate to General Residential zoned sites, in particular, as they provide a planning framework to achieve good housing outcomes. However, a Medium Density Residential zone is sought for the walkable catchment around Kerikeri and new objectives, policies and rules related to that zone are sought as discussed further in Appendix 4 and detailed in Appendix 5.	That GRZ-O1, GRZ-O2 and GRZ-O6 be retained as notified in relation to General Residentially zoned sites. New provisions are sought to apply to Medium Density Residentially zoned sites around Kerikeri Town Centre. Refer to Appendix 4 and Appendix 5 below.	Oppose	TT seeks to ensure that quality-built and urban form outcomes are achieved for the Kerikeri town centre and adjoining residential zoned land. To secure these outcomes appropriate objectives, policies, rules – consent triggers, assessment criteria etc are required.	Disallow submission subject to wording, mapping, and any other related changes. FS325.069, FS325.070, FS325.071
Subdivision								
#368	004	Far North District Council	Subdivision	Correction: The onsite wastewater option for both Mixed Use and Light Industrial zones needs to be removed as they are both 'urban' as defined in the PDP. This was incorrectly applied, the intention of the PDP in urban zoned land is the availability of adequate development infrastructure.	Amend SUB-S1 Mixed Use 2,000m2 onsite wastewater disposal 250m2 reticulated wastewater disposal Light Industrial 2,000m2 onsite wastewater disposal 500m2 reticulated wastewater disposal	Support the proposed changes.	TT supports the correction as it reflects the underlying intent of the pFNDP.	Allow the submission FS325.072
#368	087	Far North District Council	Subdivision	If a subdivision is not able to connect to a reticulated water system, the way the rule is currently drafted it could be interpreted as requiring that there be a system installed or be provided as a condition of consent (i.e s224(c)) prior to issue of any new title. The intention is that at subdivision it shall be demonstrated that a water supply system can be provided. Redraft more aligned with the standard for wastewater SU B-S5 (2)	Amend SUB-S3 3. Where a connection to Council's reticulated water systems is not available all allotments <u>shall be provided with a means to must provide</u> a water supply system.	Support	TT supports the amendment, which clarifies the intent of the standard.	Allow the submission FS325.073
#561	045	Kāinga Ora	Subdivision	Amend SUB-O3	Infrastructure is <u>existing and / or</u> planned to service the proposed subdivision and development where: a. there is existing infrastructure connection, infrastructure should provided in an integrated, efficient, coordinated and future-proofed manner at the time of subdivision; and b. where no existing connection is available infrastructure should be planned and consideration be given to connections with the wider <u>infrastructure network</u> .	Support	TT supports the amendment because it is appropriate that development can support and enable the provision of infrastructure.	Allow the submission. FS325.074

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#561	048	Kāinga Ora	Subdivision	Amend SUB-R5	Delete multi-unit and replace with land use.	Support	TT agrees that it is appropriate to enable subdivision around consented land use activity in general, not just around multi-unit development and that the provision should be extended to the Medium Density Residential zone.	Allow the submission FS325.075
Earthworks								
#368	084	Far North District Council	Earthworks	The standard does not exclude the forming of an approved driveway or crossing from a legal road or the installation and upgrading of utility connections and infrastructure. It is not the intent of this standard to require consent for these activities.	Amend EW-S6 to include: This standard does not apply to a legal road boundary where: i. The earthworks are for the formation of an approved driveway or crossing. ii. The earthworks are for the installation and upgrading of utility connections and infrastructure.	Support.	TT supports the amendment, which appropriately clarifies the intent of standard EW-S6.	Allow the submission FS325.082
Significant Natural Areas and Biodiversity								
#364	002 - 004	Director General of Conservation	Significant Natural Areas	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 is concerned that the current wording of the subdivision chapter will allow potential SNA sites to be subdivided with minimal ability to consider the adverse effects of the subdivision on indigenous biodiversity.	Use the report prepared for Council titled "Significant Indigenous Vegetation and Habitats of the Far North District -Volume 1" prepared by Wildlands Consultants (Contract Report No. 4899d, December 2019) to include SNAs in the Proposed District Plan. Include more stringent controls to allow for the consideration and scheduling of SNAs in the subdivision chapter. Due to the lack of scheduled SNAs, review all Restricted Discretionary Activity and Controlled Activity rules and add matters of discretion/control for indigenous biodiversity where not already identified.	Support in part subject to areas to be identified and mapped.	TT supports mapping for SNA's to provide clarity and relative certainty in the Plan so long as these areas are correctly mapped and the mapping is based on current ground truthing and ecological assessment. Mapping should also be cognisant of existing and proposed zoning and the need to achieve the overall strategic direction for the District.	Allow in part FS325.076, FS325.077, FS325.078
#421	138 & 139	Northland Federated Farmers	Part 2 – District wide matters – Natural environment values – Ecosystems and indigenous biodiversity – Policies – Rule IB-R1	Federated Farmers supports the inclusion of proposed Schedule 4 in the proposed district plan. The schedule is an appropriate way to recognise the relationship between private landowners and Council and the need to work in partnership to manage Significant Natural Areas.	Federated Farmers seeks the following relief: (a) the retention of Rule IB-R1 as proposed, or with wording to S421.138 effect; and (b) any consequential amendments required as a result of the sought. Federated Farmers seeks the following relief: (a) the retention and further development of Schedule 4 as proposed and S421 (b) any consequential amendments required as a result of the sought.	Support in principle subject to changes	TT support the inclusion of a Schedule to record Significant Natural Areas subject to ground truthing and ecological assessment to ensure accuracy and ensure the list SNA's contribute to achievement of the strategic direction	Allow in part FS325.079, FS325.080
Natural Hazards								
#359	013	Northland Regional Council	Natural Hazards	Understand a constraints mapping approach has been undertaken to provide underlying guidance as to which are the most appropriate zonings across the district, by excluding those areas where more intensive development and subdivision should be restricted due to constraints such as highly versatile soils, flood	Amend the planning maps to ensure that areas prone to natural hazards are not zoned for intensification.	Support	TT supports the intention of managing zoning to avoid natural hazard risks, subject to appropriate identification of areas at risk and consideration of whether risk can be appropriately managed in other ways.	Allow the submission, subject to appropriate wording and mapping. FS325.081

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				<p>and coastal hazards, ONLs and ONFs, historic/cultural heritage sites and areas.</p> <p>The proposed maps appear to rezone a number of areas to provide greater development intensity in areas at risk from natural hazards or that are unserved (e.g. lack three waters infrastructure). Do not support further intensification in flood plains given storm/flood events are predicted to intensify with climate change.</p> <p>Enabling further development in areas prone to flooding is at odds with direction in the RPS Policy 7.1.2 and Method 7.1.7</p> <p>It appears that some areas with potential flood hazards allow for intensive development. Applying a hazard overlay does not fully address this issue as the underlying zoning can create a development expectation. This is of particular concern for industrial zones with the potential for hazardous chemical storage, but is also relevant to sensitive activities such as residential development, education facilities, visitor accommodation etc.</p>				