



## **Proposed Far North District Plan**

### **Volume 4 - Summary of Decisions Requested**

SUMMARY OF SUBMISSIONS

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Thomson Survey Ltd (S195)</b>	S195.001	Ecosystems and indigenous biodiversity	IB-R1	Support in part	I support providing for limited clearance of indigenous vegetation in the circumstances listed in IB-R1. This is a practical approach to recognising that there will be circumstance where limited pruning, trimming and clearance is necessary and practical. I particularly support the inclusion of items 6 & 7, although believe the threshold applied to item 7 is too restrictive to accommodate a residential unit, onsite services and access. That access may in some instances be quite long and 1,000m <sup>2</sup> clearance would be insufficient. Item 7 recognises those instances where there is existing title upon which the owner is entitled to anticipate being able to build/live on. They may not be able to do so without some level of clearance to provide for the house site and access	Retain Rule IB-R1 as written, with the exception that item 7 be amended to read "and it does not exceed a 2,000m <sup>2</sup>
<b>Wendover Two Limited (S222)</b>	S222.028	Ecosystems and indigenous biodiversity	IB-R1	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>In addition, the use of building platform (ie single</p>	<p>Amend rule IB-R1 as follows:</p> <p>Indigenous vegetation pruning, trimming and clearance and any associated land disturbance for specified activities <del>within and outside a Significant Natural Area...</del></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 ;</p> <p>14. For existing domestic gardens</p> <p>15. It is for ecosystem protection, rehabilitation or</p>

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					<p>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.</p> <p>It is appropriate to add further exclusions for '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.</p>	restoration works
<b>Matauri Trustee Limited (S243)</b>	S243.030	Ecosystems and indigenous biodiversity	IB-R1	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. 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. In addition, the use of building platform (i.e.</li> </ol>	<p>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</b></p>

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					<p>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'. Furthermore, the rule confuses density rules applying to residential units which are specified elsewhere in the Plan.</p> <p>It is appropriate to add further exclusions for '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.</p>	<b>gardens15. It is for ecosystem protection, rehabilitation or restoration works</b>
<b>Willowridge Developments Limited (S250)</b>	S250.006	Ecosystems and indigenous biodiversity	IB-R1	Oppose	<p>It is considered that the provisions as notified are overly onerous as they require an assessment of all areas of indigenous vegetation to be undertaken to determine whether compliance with the permitted activity thresholds.</p> <p>The provisions need to be reconsidered, with appropriate indigenous vegetation clearance thresholds proposed to allow plan users and decision-makers to easily determine compliance.</p>	Amend IB-R1 to include maximum clearance thresholds.
<b>Arahia Burkhardt Macrae (S255)</b>	S255.003	Ecosystems and indigenous biodiversity	IB-R1	Support in part	There is no provision in this rule to credit landowners who are protecting indigenous vegetation or significant natural areas on their site while at the same time wishing to carry out a landuse activity which requires the removal of same, elsewhere.	Insert a new rule equivalent to SUB-R6 (Environmental Benefit Subdivision) but for landuse which Rewards landowners who have already protected areas, and incentivises landowners to protect areas.
<b>Russell Landcare Trust (S276)</b>	S276.007	Ecosystems and indigenous biodiversity	IB-R1	Support in part	Protection and recognition of indigenous biodiversity is inadequate and the rules do not prevent incremental loss.	Delete items 2 and 12 of PER-1 of rule IB-R1. Amend the commencement of PER-1 in rule IB-R1 so that it states: <b>The pruning, trimming or clearance is the minimum</b>

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						<b>necessary and is for one of the following: --Qualify item 6, clearance around buildings, of PER-1 of rule IB-R1 so that it applies to lawfully established existing buildings.-- Qualify item 7, clearance for single residential unit, of PER-1 of rule IB-R1 so that it does not apply to any clearance within a Significant Natural Area.</b>
<b>Manu Burkhardt Macrae (S279)</b>	S279.004	Ecosystems and indigenous biodiversity	IB-R1	Oppose	This rule provides for an inadequate amount of clearance and land disturbance on sites where there is a lot of indigenous vegetation and/or significant natural area by virtue of the fact that the land owner has retained or protected it. It is a perverse to penalise such a landowner if they wish to then carry out a land use activity which requires vegetation clearance or land disturbance while at the same time still retaining or protecting the majority of the indigenous vegetation or significant natural area on the site.	Amend to allow for an increase in the amount of permitted activity clearance and land disturbance for sites where there is a protection mechanism in place, such as provided for in the SUB-R6 Environmental benefit subdivision rule. This would reward landowners who already have protection and incentivise landowners to protect.
<b>Ministry of Education Te Tāhuhu o Te Mātauranga (S331)</b>	S331.044	Ecosystems and indigenous biodiversity	IB-R1	Support	The submitter supports rule IB-R1 Indigenous vegetation pruning, trimming and clearance and any associated land disturbance for specified activities within and outside a Significant Natural Area, as it provides for the pruning, trimming and clearance of indigenous vegetation where it is for the operation, repair and maintenance of lawfully established buildings, which can include educational facilities.	Retain rule IB-R1 Indigenous vegetation pruning, trimming and clearance and any associated land disturbance for specified activities within and outside a Significant Natural Area, as proposed.
<b>P S Yates Family Trust (S333)</b>	S333.020	Ecosystems and indigenous biodiversity	IB-R1	Support in part	As above in the reasons for the changes to the Overview section. In addition, the use of building platform (ie single residential unit) should not matter in assessing	Amend rule IB-R1 as follows: Indigenous vegetation pruning, trimming and clearance and any associated land disturbance for

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					<p>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'. 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 '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.</p>	<p>specified activities within and <del>outside a Significant Natural Area</del>  <b>7. To allow for the construction of a single residential unit on a title 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></p>
<p><b>Te Aupōuri Commercial Development Ltd (S339)</b></p>	<p>S339.029</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-R1</p>	<p>Not Stated</p>	<p>The PDP excludes the mapping that was released as part of the Draft Plan, and while TACDL supports its removal, it is now unclear how these provisions will be applied, assessed and monitored. Rules IB-R1, IB-R3 and IB-R4 all reference SNA as permitted activity rules. Given there is no mapping to identify these areas, there is no means to assess compliance with the permitted standards except by providing a site-specific report prepared by a suitably qualified ecologist which is considered to be inappropriate as a permitted activity status. For these reasons, TACDL are concerned with this approach and seek amendments to the provisions as they have been notified.</p>	<p>Amend Rule IB-R1 to include maximum clearance thresholds to apply to indigenous biodiversity more generally.</p>

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<b>Wakaiti Dalton (S355)</b>	S355.021	Ecosystems and indigenous biodiversity	IB-R1	Support in part	The PDP excludes the mapping that was released as part of the Draft Plan, and while we support its removal, it is now unclear how these provisions will be applied, assessed and monitored. Rules IB-R1, IB-R3 and IB-R4 all reference SNA as permitted activity rules. Given there is no mapping to identify these areas, there is no means to assess compliance with the permitted standards except by providing a site-specific report prepared by a suitably qualified ecologist which is considered to be inappropriate as a permitted activity status. For these reasons, we are concerned with this approach and seek amendments to the provisions as they have been notified.	Amend IB-R1 to include maximum clearance thresholds to apply to indigenous biodiversity more generally.
<b>Director-General of Conservation (Department of Conservation) (S364)</b>	S364.044	Ecosystems and indigenous biodiversity	IB-R1	Oppose	The Director-General requests clarity on the inclusion of vegetation clearance for biosecurity reasons. For example, in what circumstances would an unlimited amount of indigenous vegetation be cleared as a Permitted Activity for biosecurity reasons? Can any member of the public remove indigenous vegetation for biosecurity reasons or is it only specific organisations/entities?	Insert clarification within Rule IB-R1 for the inclusion of vegetation clearance for biosecurity reasons. Insert a definition for "biosecurity reasons", if appropriate.
<b>Director-General of Conservation (Department of Conservation) (S364)</b>	S364.045	Ecosystems and indigenous biodiversity	IB-R1	Oppose	Excessive clearance of indigenous vegetation can create further fragmentation and isolation of indigenous ecosystems communities. Under point 9 of Rule IB-R1, a 7m wide strip of indigenous vegetation could be removed to allow for the construction of a new fence. The Director-General queries whether this width is necessary for the function of the fencing activity. It is considered that a reduced width (e.g., 2.0m in width either side of the fence line) would be just as appropriate and result in less vegetation loss.	Amend point 9 of Rule IB-R1 as follows: The construction of a new fence where the purpose of the new fence is to exclude stock and/or pests from the area of indigenous vegetation provided that the clearance does not exceed <del>3.5m</del> <b>2.0m</b> in width either side of the fence line;
<b>KiwiRail Holdings Limited (S416)</b>	S416.033	Ecosystems and indigenous biodiversity	IB-R1	Support	KiwiRail supports the provision of the rule which acknowledges the need to operate, repair and maintain infrastructure where it has been lawfully established as a permitted activity.	Retain Rule IB-R1, in particular point 13

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Northland Federated Farmers of New Zealand (S421)	S421.138	Ecosystems and indigenous biodiversity	IB-R1	Support	Federated Farmers supports Rule IB-R1, and the associated performance stand PER-1 has it is currently drafted in the proposed district plan.	Retain Rule IB-R1 or wording with similar intent
John Andrew Riddell (S431)	S431.103	Ecosystems and indigenous biodiversity	IB-R1	Not Stated	The permitted activity rules applying to ecosystems and indigenous biodiversity are too permissive and do not achieve the purpose of the Act	Delete items 2 and 12 of PER-1 of Rule IB-R1
John Andrew Riddell (S431)	S431.104	Ecosystems and indigenous biodiversity	IB-R1	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 PER-1 of Rule IB-R1 as follows: <b>The pruning, trimming or clearance is the minimum necessary and it is for any one</b> of the following ....
John Andrew Riddell (S431)	S431.105	Ecosystems and indigenous biodiversity	IB-R1	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 item 6 of PER-1 of Rule IB-R1 to clarify that it applies to lawfully established existing buildings.
John Andrew Riddell (S431)	S431.106	Ecosystems and indigenous biodiversity	IB-R1	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 item 7 of PER-1 of Rule IB-R1 so that it does not apply to any clearance within a Significant Natural Area
Northland Fish and Game Council (S436)	S436.034	Ecosystems and indigenous biodiversity	IB-R1	Not Stated	For the reasons set out under 'general submissions 'wetlands" of the submission (refer to submission points S436.001 and S436.002), NFGC seek amendments to include the repair and maintenance of maimai as a permitted activity and wetland maintenance and restoration work as a permitted activity. These amendments would bring the Proposed Plan in line with the NES-F.	Insert a new point 13 into Rule IB-R1, redrafting point 13 as per point 14 below: <b>13. It is for wetland maintenance and restoration work.</b> 14. It is for the operation, repair and maintenance of the following activities where they have been lawfully established: i. fences



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						ii. infrastructure iii. buildings iv. driveways and access v. walking tracks vi. cycling tracks vii. farming tracks.viii. <b>Maimai</b>
<b>Kapiro Conservation Trust (S442)</b>	S442.086	Ecosystems and indigenous biodiversity	IB-R1	Oppose	<p>Para(2) - Dead trees should not be removed from SNAs but may be felled for safety reasons. Leaving them to rot down in situ is critical for nutrient cycling and providing habitat for native species. Sub-policies 3 and 12 does not protect or maintain indigenous biodiversity when it is found in a permitted activity. Allowing for vegetation clearance that is covered in the listed documents abrogates Council's authority. Sub-policy 4 is to lose and needs to refer directly to the Northland Regional Pest Plan or directions under the Biosecurity Act Sub-policy 6 - clearance within 20 meters is to far and an enormous amount significant vegetation could be cleared with 20, this should be a maximum of 10 meters or limit it to the curtilage Sub-Poliy 7 - clearance of vegetation for the purposes of developing a residential unit within an SNA should be a controlled activity to enable the council to have input about what areas are to be cleared and potential mitigation / offsetting etc., Sub-policy 8 - council unlawfully abrogates its duties under ss6(c) and 31 in relation to protecting and maintaining indigenous biodiversity. All of the other instruments listed have there own purposes which may not necessarily reflect the requirements of the RMA Sub-Policy 9 allows for an extremely wide clearance on either side of the fence of 3.5 m. That would accommodate an exceptionally large bulldozer or tractor. This should be reduced to 1 meter either side of the fence which in effect is 2</p>	Amend IB-R1: 2. To <b>fell</b> dead trees in SNAs that are a safety risk to life or property <del>remove...</del> <b>felled trees should remain in situ in SNAs if it is possible, no more indigenous vegetation is cleared or trimmed than is necessary for safe felling and the clearance is undertaken in accordance with advice from a suitably qualified arborist;</b> Delete sub-policies 3, and 12. Replace sub-policy 4 with <b>4. Clearance for biosecurity reasons. Clearance is for the removal of material infected y unwanted organisms as declared by the Minister for Primary industries Chief Technical Officer, or an emergency declared under the Biosecurity Act 1993; or4X.The clearance is unavoidable in the course of</b>

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					<p>meters in total Sub-Policy 10 - Forest &amp; Bird acknowledge that this is down from 20 year old in the previous draft, however we remain concerned. It may be difficult to determine the age of some plant species and may require expert assessment in some cases. For example in a stunted wet area and for coastal vegetation. it is not appropriate to require expert assessor in a permitted rule and this makes the rule uncertain and difficult to enforce. F&amp;B is also concerned that this rule will result in the loss of regenerating vegetation or enhancement plantings, for example where land changes hands or land use changes. Sub-Policy 11 - needs to be tied to a specific figure to make this certain or limit it to maintenance of existing firebreaks Sub-policy 13 is very broad and could include a range of clearances. The cub-policy is uncertain at the moment because it is left to the discretion of the person undertaking the activity to determine how much clearance should occur.</p>	<p><b>removing pest plants and pest animals in accordance with any regional pest management plan or the Biosecurity Act 1993 or where this occurs as part of indigenous biodiversity restoration or enhancement</b>            Amend sub-policy 6 as:            6. To create or maintain a <b>10</b> <del>20</del> meter setback ...Delete Sub-policy 7 and add a new controlled activity rule for new residential units in SNAs            Make sub-policy 8 at least a controlled activity            Amend 9. ... not exceed <del>3.5</del> <b>1</b> m in width either side of the fence line            Delete sub-policy 10 consider relating this to kanuka and manuka that is less than 10 years old and is only significant because of the risk of myrtle rust or reduce it vegetation where it is possible to prove that it is no older than 5 years old.            Amend sub-policy 11            11.Maintenance of firebreaks to manage fire risk. Amend sub-policy 13 as            13. It is for the operation,</p>

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						repair and maintenance of the following activities <b>and is within 1 meter (either side)</b> of the ...
<b>Kapiro Conservation Trust (S442)</b>	S442.152	Ecosystems and indigenous biodiversity	IB-R1	Support	<p>Clause 6 in PER-1 of Rule IB-R1 should be amended as a 20m clearance zone around buildings "used for a vulnerable purpose" is not appropriate in areas where there is relatively mature forest, duneland vegetation or wetlands. Often such clearance occurs pre-emptively, setting up a cycle of vegetation change to increasing weediness and fire vulnerability</p> <p>Clause 7 in PER-1 of Rule IB-R1 should be amended to recognise that 1,000m<sup>2</sup> of vegetation clearance on a lot for the residential building and associated essential infrastructure is inappropriate on smaller lots with an indigenous cover and where clause 6 also applies. The definition of infrastructure in this context is too large.</p>	<p>Amend Clause 6 in PER-1 of Rule IB-R1 to a 5m default for indigenous vegetation .</p> <p>By including a definition for "indigenous vegetation", it should be clear which vegetation is not indigenous and where a larger area can be cleared (as per S451.001).</p> <p>A different larger setback/clearance zone is appropriate for naturalised non-native vegetation such as mixtures of gorse, pampas, wattles, tobacco weed, pines and privet. This non-native vegetation is typically far more flammable than native vegetation</p> <p>Amend Clause 7 in PER-1 of Rule IB-R1 to 300m<sup>2</sup> on smaller lots that have a primarily indigenous vegetation cover</p> <p>Clarify what is "essential infrastructure" in the context of Clause 7 in PER-1 of Rule IB-R1.</p>
<b>Kapiro Conservation Trust (S442)</b>	S442.182	Ecosystems and indigenous biodiversity	IB-R1	Support	<p>(2) - Dead trees in SNAs should only be felled if they pose a significant safety risk as standing dead trees provide important roost sites for threatened native species such as bats. Where dead trees are felled they must be left to decompose in situ to enable nutrient cycling and provide important habitat</p> <p>(7) - Clearance of vegetation for the purposes of developing a residential unit within an SNA should be a controlled activity to ensure</p>	<p>Delete (2) and (12).</p> <p>Delete (7) and add a new controlled activity rule for new residential units in SNAs</p> <p>Amend (9) ... <b>"not exceed 4 m in total width"</b></p> <p>Amend (10) to reduce it to vegetation where it is possible</p>

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					<p>adequate consideration has been given to avoiding and/or mitigating adverse effects</p> <p>(9) - The width of permitted clearance for fence lines is excessive. While it may be necessary to drive posts using a tractor you do not need tractor clearance down either side of the fenceline</p> <p>(10) - Recognise the need for landowners to be able to keep their land in a "cleared" state without needing resource consent but the time frame should be reduced to 5 year old vegetation and there has to be an available evidential basis to establish the age e.g. google earth, photos or other records.</p> <p>(12) - The Forests Act does not have the same purpose or principles as the RMA so the council cannot rely on decisions made under this Act.</p>	<p>to establish that it is under 5 years old without expert input.</p>
<p><b>Pacific Eco-Logic (S451)</b></p>	<p>S451.008</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-R1</p>	<p>Support in part</p>	<p>Clause 6 in PER-1 of Rule IB-R1 should be amended as a 20m clearance zone around buildings "used for a vulnerable purpose" is not appropriate in areas where there is relatively mature forest, duneland vegetation or wetlands. Often such clearance occurs pre-emptively, setting up a cycle of vegetation change to increasing weediness and fire vulnerability</p> <p>Clause 7 in PER-1 of Rule IB-R1 should be amended to recognise that 1,000m<sup>2</sup> of vegetation clearance on a lot for the residential building and associated essential infrastructure is inappropriate on smaller lots with an indigenous cover and where clause 6 also applies. The definition of infrastructure in this context is too large.</p>	<p>Amend Clause 6 in PER-1 of Rule IB-R1 to a 5m default for indigenous vegetation .</p> <p>By including a definition for "indigenous vegetation", it should be clear which vegetation is not indigenous and where a larger area can be cleared (as per S451.001).</p> <p>A different larger setback/clearance zone is appropriate for naturalised non-native vegetation such as mixtures of gorse, pampas, wattles, tobacco weed, pines and privet. This non-native vegetation is typically far more flammable than native vegetation</p> <p>Amend Clause 7 in PER-1 of Rule IB-R1 to 300m<sup>2</sup> on smaller lots that have a primarily indigenous vegetation cover</p> <p>Clarify what is "essential infrastructure" in the context of</p>

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						Clause 7 in PER-1 of Rule IB-R1
<b>Transpower New Zealand Ltd (S454)</b>	S454.087	Ecosystems and indigenous biodiversity	IB-R1	Support	Transpower supports the inclusion of this rule as it provides for vegetation clearance to ensure the safe and efficient operation of infrastructure, such as the National Grid.	Retain IB-R1.
<b>Waiaua Bay Farm Limited (S463)</b>	S463.031	Ecosystems and indigenous biodiversity	IB-R1	Support	WBF supports the inclusion of a permitted activity rule for the various activities listed. It recommends minor amendments to sub-clause (3) because: The distinction between use of tracks for walking or cycling appears to be of no consequence if the limit on clearance is observed. Increasing the allowance to a 1.8m wide path would be consistent with the minimum standard for pedestrian paths provided in reserves specified in s7.2.5.3 of Council's proposed Engineering Standards V. 0.5 (April 2022). The focus on manual methods appears to be redundant if the requirement to maintain larger trees is observed.	Amend point 3. of PER-1 of Rule IB-R1 as follows: 3. The formation of walking <b>or cycling</b> tracks <b>no greater-less</b> than <b>1.82m</b> wide <del>using manual methods</del> which <b>does not</b> require the removal of any tree over 300 mm in girth.
<b>Adams-Te Whata Whanau Trust (S473)</b>	S473.001	Ecosystems and indigenous biodiversity	IB-R1	Support in part	it is unclear whether clearing the bush to manage fire risk or plants damaging buildings would be covered by PER-1 13 for the operation, repair and maintenance of building activities or PER-1 -11 creation and maintenance of fire breaks to manage fire risk.	amend IB-R1 PER-1 1. "To address an immediate risk to the health and safety of the public or <b>probable, imminent or actual</b> damage to property" PER-1 13. "It is for the <b>protection</b> , operation, repair and maintenance of the following activities where they have been lawfully established."
<b>Tracy and Kenneth Dalton (S479)</b>	S479.016	Ecosystems and indigenous biodiversity	IB-R1	Oppose	The PDP excludes the mapping that was released as part of the Draft Plan, and while we support its removal, it is now unclear how these provisions will be applied, assessed and monitored. Rules IB-R1, IB-R3 and IB-R4 all	Amend IB-R1 to include maximum clearance thresholds to apply to indigenous biodiversity more generally.

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					reference SNA as permitted activity rules. Given there is no mapping to identify these areas, there is no means to assess compliance with the permitted standards except by providing a site-specific report prepared by a suitably qualified ecologist which is considered to be inappropriate as a permitted activity status. For these reasons, we are concerned with this approach and seek amendments to the provisions as they have been notified.	
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.067	Ecosystems and indigenous biodiversity	IB-R1	Oppose	<p>Para(2) - Dead trees should not be removed from SNAs but may be felled for safety reasons. Leaving them to rot down in situ is critical for nutrient cycling and providing habitat for native species. Sub-policies 3 and 12 does not protect or maintain indigenous biodiversity when it is found in a permitted activity. Allowing for vegetation clearance that is covered in the listed documents abrogates Council's authority. Sub-policy 4 is to lose and needs to refer directly to the Northland Regional Pest Plan or directions under the Biosecurity Act Sub-policy 6 - clearance within 20 meters is to far and an enormous amount significant vegetation could be cleared with 20, this should be a maximum of 10 meters or limit it to the curtilage Sub-Poly 7 - clearance of vegetation for the purposes of developing a residential unit within an SNA should be a controlled activity to enable the council to have input about what areas are to be cleared and potential mitigation / offsetting etc., Sub-policy 8 - council unlawfully abrogates its duties under ss6(c) and 31 in relation to protecting and maintaining indigenous biodiversity. All of the other instruments listed have there own purposes which may not necessarily reflect the requirements of the RMA Sub-Policy 9 allows for an extremely wide clearance on either side of the fence of 3.5 m. That would accommodate an exceptionally large bulldozer or tractor. This should be reduced to 1 meter either side of the fence which in effect is 2</p>	<p>Amend IB-R1                  2. To <b>fell</b> dead trees in SNAs that are a safety risk to life or property <del>remove...</del> <b>felled trees should remain in situ in SNAs if it is possible, no more indigenous vegetation is cleared or trimmed than is necessary for safe felling and the clearance is undertaken in accordance with advice from a suitably qualified arborist;</b>                  Delete sub-policies 3, and 12.                  Replace sub-policy 4 with                  4. <del>Clearance for biosecurity reasons.</del> <b>Clearance is for the removal of material infected y unwanted organisms as declared by the Minister for Primary industries Chief Technical Officer, or an emergency declared under the Biosecurity Act 1993; or 4X.The clearance is unavoidable in the course of</b></p>

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					<p>meters in total Sub-Policy 10 - Forest &amp; Bird acknowledge that this is down from 20 year old in the previous draft, however we remain concerned. It may be difficult to determine the age of some plant species and may require expert assessment in some cases. For example in a stunted wet area and for coastal vegetation. it is not appropriate to require expert assessor in a permitted rule and this makes the rule uncertain and difficult to enforce. F&amp;B is also concerned that this rule will result in the loss of regenerating vegetation or enhancement plantings, for example where land changes hands or land use changes. Sub-Policy 11 - needs to be tied to a specific figure to make this certain or limit it to maintenance of existing firebreaks Sub-policy 13 is very broad and could include a range of clearances. The sub-policy is uncertain at the moment because it is left to the discretion of the person undertaking the activity to determine how much clearance should occur.</p>	<p><b>removing pest plants and pest animals in accordance with any regional pest management plan or the Biosecurity Act 1993 or where this occurs as part of indigenous biodiversity restoration or enhancement</b></p> <p>Amend sub-policy 6 as:          6. To create or maintain a <b>10</b> <del>20</del> meter setback ... Delete Sub-policy 7 and add a new controlled activity rule for new residential units in SNAs          Make sub-policy 8 at least a controlled activity          Amend 9. ... not exceed <del>3.5</del> <b>1</b> m in width either side of the fence line</p> <p>Delete sub-policy 10 consider relating this to kanuka and manuka that is less than 10 years old and is only significant because of the risk of myrtle rust or reduce it vegetation where it is possible to prove that it is no older than 5 years old.          Amend sub-policy 11          11.Maintenance of firebreaks to manage fire risk Amend sub-policy 13 as 13. It is for the</p>

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						operation, repair and maintenance of the following activities <b>and is within 1 meter (either side)</b> of the ...
<b>Fire and Emergency New Zealand (S512)</b>	S512.026	Ecosystems and indigenous biodiversity	IB-R1	Support	Fire and Emergency may be required to remove vegetation in the event of an emergency or to reduce fire risk. This is enabled under Section 65 and 68 of the Fire and Emergency New Zealand Act 2017. The exact quantities of vegetation disturbance required cannot be determined in advance, and will be unique to the risk or emergency response required. Fire and Emergency considers that this approach provides for these activities and so support the references to addressing immediate risks to health and safety, and managing fire risk. This aligns with the Fire and Emergency New Zealand Act 2017.	retain IB-R1
<b>New Zealand Kiwifruit Growers Incorporated (S518)</b>	S518.002	Ecosystems and indigenous biodiversity	IB-R1	Support	It is important that Kiwifruit Vine Health can identify and remove wild kiwifruit without delay for biosecurity reasons and to protect indigenous biodiversity.	Retain IB-R1 as notified.
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527)</b>	S527.006	Ecosystems and indigenous biodiversity	IB-R1	Not Stated	Rule IB-R1 allows indigenous vegetation clearance within and outside SNAs for a list of specified purposes which is too broad. For example: <ul style="list-style-type: none"> <li>- The rule allows clearance up to 1,000m2 for building a residential unit in a SNA without requiring or considering whether existing clear areas can be used instead.</li> <li>- The clearance of dead trees (if they are not unsafe) or indigenous vegetation less than 10 years old can be detrimental for at risk indigenous species/habitat.</li> </ul>	Amend IB-R1 to make more restrictive (inferred)
<b>Carbon Neutral NZ Trust (S529)</b>	S529.122	Ecosystems and	IB-R1	Oppose	Proposed rule IB-R1 allows indigenous vegetation clearance within and outside SNAs for a list of specified purposes which is too	Amend Rule IB-R1



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		indigenous biodiversity			<p>broad. For example:</p> <ul style="list-style-type: none"> <li>- The rule allows clearance up to 1,000m<sup>2</sup> for building a residential unit in a SNA without requiring or considering whether existing clear areas can be used instead.</li> <li>- The clearance of dead trees (if they are not unsafe) or indigenous vegetation less than 10 years old can be detrimental for at risk indigenous species/habitat.</li> </ul>	
<b>Carbon Neutral NZ Trust (S529)</b>	S529.125	Ecosystems and indigenous biodiversity	IB-R1	Support in part	<p>The PDP provisions do not address some on-going practical problems with vegetation clearance, which often involved heavy machinery. For example, local conservation groups have experienced cases in recent years where landowners claim they are only or primarily clearing exotic vegetation, even when the destruction of a significant amount of indigenous vegetation is clearly visible on the site. To address this problem, PDP rules on clearance need to apply to vegetation that includes indigenous vegetation. The clearance of any type of vegetation, including plantation forests, can cause problems in areas where at-risk species are present. Local conservation groups have found that substantial areas of exotic or mixed vegetation have been cleared by large diggers or bulldozers without any precautions or regard for vulnerable types of indigenous species that are present or nesting on the ground or in the vegetation (eg. nesting kiwis, rare native lizards).</p>	Amend Rule IB-R1 to apply to vegetation that includes indigenous vegetation.
<b>Marianna Fenn (S542)</b>	S542.012	Ecosystems and indigenous biodiversity	IB-R1	Oppose	<p>(2) - Dead trees in SNAs should only be felled if they pose a significant safety risk as standing dead trees provide important roost sites for threatened native species such as bats. Where dead trees are felled they must be left to decompose in situ to enable nutrient cycling and provide important habitat</p> <p>(7) - Clearance of vegetation for the purposes of developing a residential unit within an SNA should be a controlled activity to ensure adequate consideration has been given to</p>	<p>Delete (2) and (12). Delete (7) and add a new controlled activity rule for new residential units in SNAs Amend (9) ... <b>not exceed 4 m in total width</b> Amend (10) to reduce it to vegetation where it is possible to establish that it is under 5</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>avoiding and/or mitigating adverse effects</p> <p>(9) - The width of permitted clearance for fence lines is excessive. While it may be necessary to drive posts using a tractor you do not need tractor clearance down either side of the fenceline</p> <p>(10) - Recognise the need for landowners to be able to keep their land in a "cleared" state without needing resource consent but the time frame should be reduced to 5 year old vegetation and there has to be an available evidential basis to establish the age e.g. google earth, photos or other records.</p> <p>(12) - The Forests Act does not have the same purpose or principles as the RMA so the council cannot rely on decisions made under this Act</p>	years old without expert input.
<b>Te Rūnanga o Ngāti Rēhia (S559)</b>	S559.014	Ecosystems and indigenous biodiversity	IB-R1	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, 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.</p>	Delete IB-R1 and redraft in conjunction with tangata whenua (inferred).
<b>Bentzen Farm Limited (S167)</b>	S167.022	Ecosystems and indigenous biodiversity	IB-R2	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. Without mapping the SNAs, the associated rules lack precision, and in relying on case-by-case assessment by</p>	Delete Rule IB-R2

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					landowners as proposed, risk not being consistently applied.	
<b>Setar Thirty Six Limited (S168)</b>	S168.029	Ecosystems and indigenous biodiversity	IB-R2	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>	Delete Rule IB-R2
<b>The Shooting Box Limited (S187)</b>	S187.022	Ecosystems and indigenous biodiversity	IB-R2	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</p>	Delete Rule IB-R2.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.	
<b>Wendover Two Limited (S222)</b>	S222.029	Ecosystems and indigenous biodiversity	IB-R2	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>	Delete Rule IB-R2
<b>Matauri Trustee Limited (S243)</b>	S243.031	Ecosystems and indigenous biodiversity	IB-R2	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</p>	Delete Rule IB-R2

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					lack precision, and in relying on case-by-case assessment by landowners as proposed, risk not being consistently applied.	
<b>Willowridge Development s Limited (S250)</b>	S250.007	Ecosystems and indigenous biodiversity	IB-R2	Oppose	It is considered that the provisions as notified are overly onerous as they require an assessment of all areas of indigenous vegetation to be undertaken to determine whether compliance with the permitted activity thresholds. The provisions need to be reconsidered, with appropriate indigenous vegetation clearance thresholds proposed to allow plan users and decision-makers to easily determine compliance.	Amend IB-R2 to include maximum clearance thresholds.
<b>P S Yates Family Trust (S333)</b>	S333.021	Ecosystems and indigenous biodiversity	IB-R2	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-by-case assessment by landowners as proposed, risk not being consistently applied.	Delete Rule IB-R2
<b>Te Aupōuri Commercial</b>	S339.028	Ecosystems and	IB-R2	Not Stated	TACDL are concerned that the provisions for ecosystems and indigenous biodiversity do not provide sufficient enablement for the use and	Amend the thresholds detailed in Rule IB-R2, so that they appropriately recognise and

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<b>Development Ltd (S339)</b>		indigenous biodiversity			<p>occupation of land. While IB-R2 provides for limited clearance of land for papakāinga, the thresholds do not sufficiently enable the development of land for papakāinga development, particularly where there is more than one residential unit being constructed. In TACDL's view, this does not recognise the complex nature of multiple ownership of Māori land or in TACDL's case, the need to provide for the social and economic wellbeing of its many uri (members).</p> <p>In addition to the above, it is TACDL's view that Māori land is already significantly burdened by complex legislative processes and the many barriers to undertake development that it considers these provisions to inadequately recognise and respond to that context. Further, it is noted that the section 32 does not include analysis on the suitability of the thresholds proposed, and in the absence of this, TACDL seek flexibility in the thresholds.</p>	provide for the role of tangata whenua as kaitiaki.
<b>Te Aupōuri Commercial Development Ltd (S339)</b>	S339.030	Ecosystems and indigenous biodiversity	IB-R2	Not Stated	<p>The PDP excludes the mapping that was released as part of the Draft Plan, and while TACDL supports its removal, it is now unclear how these provisions will be applied, assessed and monitored. Rules IB-R1, IB-R3 and IB-R4 all reference SNA as permitted activity rules. Given there is no mapping to identify these areas, there is no means to assess compliance with the permitted standards except by providing a site-specific report prepared by a suitably qualified ecologist which is considered to be inappropriate as a permitted activity status. For these reasons, TACDL are concerned with this approach and seek amendments to the provisions as they have been notified.</p>	Amend Rule IB-R2 to include maximum clearance thresholds to apply to indigenous biodiversity more generally.
<b>Wakaiti Dalton (S355)</b>	S355.020	Ecosystems and indigenous biodiversity	IB-R2	Support in part	<p>A number of our sites of interest has established indigenous vegetation providing important habitat for fauna. The extent and health of this habitat demonstrates how we have been exercising and performing our role as kaitiaki and managing this resource for current and</p>	Amend the thresholds detailed in IB-R2, to reflect the role of tangata whenua as kaitiaki, and provide for tangata whenua to use and occupy their land.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>future generations of our whanau.</p> <p>We have concerns with the provisions for EIB, as they do not provide sufficient enablement for the use and occupation of land. As FNDC is aware, whenua Māori has been alienated through decades of legislative processes resulting in the marginalisation of Māori from their lands, waters, sites, wāhi tapu and taonga. For these reasons, the enablement of use and development to support the occupation of whenua is required. While IB-R2 provides for limited clearance of land for papakāinga, the thresholds do not sufficiently enable the development of land for papakāinga development, particularly where there is more than one residential unit being constructed. In our view, this does not recognise the complex nature of multiple ownership of whenua Māori land. In our case, our land was converted through Māori Affairs legislation in the 50's to General Title, and although two of these blocks have remained in general title the land is ancestral and provides for the wellbeing of our wider whanau.</p> <p>Finally, it is noted that the section 32 does not include analysis on the suitability of the thresholds proposed, and in the absence of this, we seek flexibility in the thresholds to provide for the wellbeing of our whanau.</p>	
<b>Wakaiti Dalton (S355)</b>	S355.022	Ecosystems and indigenous biodiversity	IB-R2	Support in part	<p>The PDP excludes the mapping that was released as part of the Draft Plan, and while we support its removal, it is now unclear how these provisions will be applied, assessed and monitored. Rules IB-R1, IB-R3 and IB-R4 all reference SNA as permitted activity rules. Given there is no mapping to identify these areas, there is no means to assess compliance with the permitted standards except by providing a site-specific report prepared by a suitably qualified ecologist which is considered to be inappropriate as a permitted activity status. For these reasons, we are concerned with this approach and seek</p>	Amend IB-R2 to include maximum clearance thresholds to apply to indigenous biodiversity more generally.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					amendments to the provisions as they have been notified.	
<b>Adams-Te Whata Whanau Trust (S473)</b>	S473.004	Ecosystems and indigenous biodiversity	IB-R2	Support in part	if only one papakainga house is proposed to be built the limit should be 1,000sq metres and not 500sq metres so that the permitted residential unit for Maori is not less than a single residential unit of a title under IB-R1. As Maori tend to have bigger families and require a bigger house this restriction appears to be unnecessarily discriminatory.	amend IB-R2 PER-1 2. 1,000m2 for the first residential unit, 500m2 for subsequent units
<b>Tracy and Kenneth Dalton (S479)</b>	S479.015	Ecosystems and indigenous biodiversity	IB-R2	Support	<p>A number of our sites of interest has established indigenous vegetation providing important habitat for fauna. The extent and health of this habitat demonstrates how we have been exercising and performing our role as kaitiaki and managing this resource for current and future generations of our whanau.</p> <p>We have concerns with the provisions for EIB, as they do not provide sufficient enablement for the use and occupation of land. As FNDC is aware, whenua Māori has been alienated through decades of legislative processes resulting in the marginalisation of Māori from their lands, waters, sites, wāhi tapu and taonga. For these reasons, the enablement of use and development to support the occupation of whenua is required. While IB-R2 provides for limited clearance of land for papakāinga, the thresholds do not sufficiently enable the development of land for papakāinga development, particularly where there is more than one residential unit being constructed. In our view, this does not recognise the complex nature of multiple ownership of whenua Māori land. In our case, our land was converted through Māori Affairs legislation in the 50's to General Title, and although two of these blocks have remained in general title the land is ancestral and provides for the wellbeing of our wider whanau.</p> <p>Finally, it is noted that the section 32 does not</p>	Amend the thresholds detailed in IB-R2, to reflect the role of tangata whenua as kaitiaki, and provide for tangata whenua to use and occupy their land.



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					include analysis on the suitability of the thresholds proposed, and in the absence of this, we seek flexibility in the thresholds to provide for the wellbeing of our whanau.	
<b>Tracy and Kenneth Dalton (S479)</b>	S479.017	Ecosystems and indigenous biodiversity	IB-R2	Oppose	The PDP excludes the mapping that was released as part of the Draft Plan, and while we support its removal, it is now unclear how these provisions will be applied, assessed and monitored. Rules IB-R1, IB-R3 and IB-R4 all reference SNA as permitted activity rules. Given there is no mapping to identify these areas, there is no means to assess compliance with the permitted standards except by providing a site-specific report prepared by a suitably qualified ecologist which is considered to be inappropriate as a permitted activity status. For these reasons, we are concerned with this approach and seek amendments to the provisions as they have been notified.	Amend IB-R2 to include maximum clearance thresholds to apply to indigenous biodiversity more generally
<b>Carbon Neutral NZ Trust (S529)</b>	S529.126	Ecosystems and indigenous biodiversity	IB-R2	Support in part	The PDP provisions do not address some on-going practical problems with vegetation clearance, which often involved heavy machinery. For example, local conservation groups have experienced cases in recent years where landowners claim they are only or primarily clearing exotic vegetation, even when the destruction of a significant amount of indigenous vegetation is clearly visible on the site. To address this problem, PDP rules on clearance need to apply to vegetation that includes indigenous vegetation. The clearance of any type of vegetation, including plantation forests, can cause problems in areas where at-risk species are present. Local conservation groups have found that substantial areas of exotic or mixed vegetation have been cleared by large diggers or bulldozers without any precautions or regard for vulnerable types of indigenous species that are present or nesting on the ground or in the vegetation (eg. nesting kiwis, rare native lizards).	Amend Rule IB-R2 to apply to vegetation that includes indigenous vegetation.

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<b>Te Rūnanga o Ngāti Rēhia (S559)</b>	S559.015	Ecosystems and indigenous biodiversity	IB-R2	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-R2 and redraft in conjunction with tangata whenua (inferred).
<b>Bentzen Farm Limited (S167)</b>	S167.023	Ecosystems and indigenous biodiversity	IB-R3	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.	Delete Rule IB-R3
<b>Setar Thirty Six Limited (S168)</b>	S168.030	Ecosystems and indigenous biodiversity	IB-R3	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.	Delete Rule IB-R3

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					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>The Shooting Box Limited (S187)</b>	S187.023	Ecosystems and indigenous biodiversity	IB-R3	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>	Delete Rule IB-R3
<b>Wendover Two Limited (S222)</b>	S222.030	Ecosystems and indigenous biodiversity	IB-R3	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</p>	Delete Rule IB-R3

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					<p>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>	
<b>Matauri Trustee Limited (S243)</b>	S243.032	Ecosystems and indigenous biodiversity	IB-R3	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>	Delete Rule IB-R3
<b>Willowridge Developments Limited (S250)</b>	S250.008	Ecosystems and indigenous biodiversity	IB-R3	Oppose	<p>It is considered that the provisions as notified are overly onerous as they require an assessment of all areas of indigenous vegetation to be undertaken to determine whether compliance with the permitted activity thresholds.</p> <p>The provisions need to be reconsidered, with appropriate indigenous vegetation clearance thresholds proposed to allow plan users and decision-makers to easily determine compliance.</p>	Amend IB-R3 to include maximum clearance thresholds.
<b>Arahia Burkhardt Macrae (S255)</b>	S255.004	Ecosystems and indigenous biodiversity	IB-R3	Oppose	<p>This rule provides for an inadequate amount of clearance and land disturbance on sites where there is a lot of indigenous vegetation and/or significant natural area by virtue of the fact that the land owner has retained or protected it. It is</p>	Amend rule to increase the amount of permitted activity clearance and land disturbance for sites where there is a protection mechanism in place

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					a perverse to penalise such a landowner if they wish to then carry out a land use activity which requires vegetation clearance or land disturbance while at the same time still retaining or protecting the majority of the indigenous vegetation or significant natural area on the site. Increasing vegetation clearance limits could reward landowners who already have protection and incentivise landowners to protect.	(such as provided for in SUB-R6 Environmental Benefit Subdivision rule).
<b>Russell Landcare Trust (S276)</b>	S276.008	Ecosystems and indigenous biodiversity	IB-R3	Support in part	Protection and recognition of indigenous biodiversity is inadequate and the rules do not prevent incremental loss.	Amend PER-1 of IB-R3, clearance within a Significant Natural Area, so that it provides for a total clearance of no more than 100 square metres in any 10 year period. Amend clause 2 of PER-2 of rule IB-R3 so that it provides for a total clearance of no more than 100 square metres in any 10 year period.
<b>Manu Burkhardt Macrae (S279)</b>	S279.005	Ecosystems and indigenous biodiversity	IB-R3	Oppose	This rule provides for an inadequate amount of clearance and land disturbance on sites where there is a lot of indigenous vegetation and/or significant natural area by virtue of the fact that the land owner has retained or protected it. It is a perverse to penalise such a landowner if they wish to then carry out a land use activity which requires vegetation clearance or land disturbance while at the same time still retaining or protecting the majority of the indigenous vegetation or significant natural area on the site.	Amend to allow for an increase in the amount of permitted activity clearance and land disturbance for sites where there is a protection mechanism in place such as provided for in the SUB-R6 Environmental benefit subdivision rule. This would reward landowners who already have protection and incentivise landowners to protect.
<b>P S Yates Family Trust (S333)</b>	S333.022	Ecosystems and indigenous biodiversity	IB-R3	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	Delete Rule IB-R3

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>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.</p>	
<p><b>Te Aupōuri Commercial Development Ltd (S339)</b></p>	<p>S339.031</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-R3</p>	<p>Not Stated</p>	<p>The PDP excludes the mapping that was released as part of the Draft Plan, and while TACDL supports its removal, it is now unclear how these provisions will be applied, assessed and monitored. Rules IB-R1, IB-R3 and IB-R4 all reference SNA as permitted activity rules. Given there is no mapping to identify these areas, there is no means to assess compliance with the permitted standards except by providing a site-specific report prepared by a suitably qualified ecologist which is considered to be inappropriate as a permitted activity status. For these reasons, TACDL are concerned with this approach and seek amendments to the provisions as they have been notified.</p>	<p>Amend Rule IB-R3 to include maximum clearance thresholds to apply to indigenous biodiversity more generally.</p>
<p><b>Wakaiti Dalton (S355)</b></p>	<p>S355.023</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-R3</p>	<p>Support in part</p>	<p>The PDP excludes the mapping that was released as part of the Draft Plan, and while we support its removal, it is now unclear how these provisions will be applied, assessed and monitored. Rules IB-R1, IB-R3 and IB-R4 all reference SNA as permitted activity rules. Given there is no mapping to identify these areas, there is no means to assess compliance with the permitted standards except by providing a site-specific report prepared by a suitably qualified ecologist which is considered to be inappropriate</p>	<p>Amend IB-R3 to include maximum clearance thresholds to apply to indigenous biodiversity more generally.</p>

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					as a permitted activity status. For these reasons, we are concerned with this approach and seek amendments to the provisions as they have been notified	
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.046	Ecosystems and indigenous biodiversity	IB-R3	Oppose	Excessive clearance of indigenous vegetation can create further fragmentation and isolation of indigenous ecosystems communities. The Director-General considers that allowing 100m <sup>2</sup> of indigenous vegetation clearance per site in any calendar year is enabling the incremental loss of SNAs. It is acknowledged that some removal of indigenous vegetation is necessary, but only in circumstances that can be or are already identified in the District Plan. The removal of 100m <sup>2</sup> of indigenous vegetation within a SNA per site/year with no reason should require resource consent and should not be allowed as a permitted activity.	Delete Rule IB-R3 and amend the rules to only allow the removal of indigenous vegetation as a permitted activity in specific circumstances that have an identified need. The removal of indigenous vegetation for non-specified purposes should require resource consent as a non-complying activity.
<b>John Andrew Riddell (S431)</b>	S431.107	Ecosystems and indigenous biodiversity	IB-R3	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 PER-1 of IB-R3 so that it provides for a total clearance of no more than 100 square metres in any 10 year period.
<b>John Andrew Riddell (S431)</b>	S431.108	Ecosystems and indigenous biodiversity	IB-R3	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 2 of PER-2 of rule IB-R3 so that it provides for a total clearance of no more than 100 square metres in any 10 year period.
<b>Kapiro Conservation Trust (S442)</b>	S442.087	Ecosystems and indigenous biodiversity	IB-R3	Support in part	Allowing for yearly 100m <sup>2</sup> clearance of vegetation likely to result in incremental degradation and loss of SNAs. Restricting to 50m <sup>2</sup> clearance every 5-10 years in lower value SNAs would achieve a better balance. NOTE inconsistency between management of SNAs inland and high natural character areas in the coastal environment to which a 50m <sup>2</sup> over 10 year limit applies.	Amend to list the most sensitive types of areas of indigenous biodiversity in the Far North and reduce the threshold for clearance to 50 square meters every 5 years. For other less sensitive types of indigenous biodiversity keep set at 100 square meters every 5 years.
<b>Kapiro Conservation Trust (S442)</b>	S442.183	Ecosystems and	IB-R3	Oppose	Allowing for yearly 100m <sup>2</sup> clearance of vegetation likely to result in incremental degradation and loss of SNAs. Some SNA areas	Amend to reduce the threshold for clearance to 50 square meters every 5 years; and

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
		indigenous biodiversity			may be so rare or vulnerable that consent should be required for any clearance or disturbance.	Separately identify particularly SNAs that include particularly rare or vulnerable indigenous biodiversity and require consent for any clearance or disturbance of these areas.
<b>Waiaua Bay Farm Limited (S463)</b>	S463.032	Ecosystems and indigenous biodiversity	IB-R3	Support	In the Special Purpose Zone - Kauri Cliffs, numerous areas of ecological restoration are being progressed at any one time. The allowance for 100 m <sup>2</sup> of clearance in a SNA per calendar year is considered appropriate. The activity status being discretionary once this threshold is exceeded is considered appropriate to avoid, remedy and mitigate the effects of further vegetation removal where required.	Retain Rule IB-R3
<b>Tracy and Kenneth Dalton (S479)</b>	S479.018	Ecosystems and indigenous biodiversity	IB-R3	Oppose	The PDP excludes the mapping that was released as part of the Draft Plan, and while we support its removal, it is now unclear how these provisions will be applied, assessed and monitored. Rules IB-R1, IB-R3 and IB-R4 all reference SNA as permitted activity rules. Given there is no mapping to identify these areas, there is no means to assess compliance with the permitted standards except by providing a site-specific report prepared by a suitably qualified ecologist which is considered to be inappropriate as a permitted activity status. For these reasons, we are concerned with this approach and seek amendments to the provisions as they have been notified.	Amend IB-R3 to include maximum clearance thresholds to apply to indigenous biodiversity more generally.
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.068	Ecosystems and indigenous biodiversity	IB-R3	Oppose	Allowing for yearly 100m <sup>2</sup> clearance of vegetation likely to result in incremental degradation and loss of SNAs. Restricting to 50m <sup>2</sup> clearance every 5-10 years in lower value SNAs would achieve a better balance. NOTE inconsistency between management of SNAs inland and high natural character areas in the coastal environment to which a 50m <sup>2</sup> over 10 year limit applies	Amend to list the most sensitive types of areas of indigenous biodiversity in the Far North and reduce the threshold for clearance to 50 square meters every 5 years. For other less sensitive types of indigenous biodiversity keep set at 100 square meters every 5 years



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<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527)</b>	S527.007	Ecosystems and indigenous biodiversity	IB-R3	Oppose	Allows clearance of indigenous vegetation up to 100m2 per calendar year in areas confirmed (by ecological assessment) to be SNAs and in areas where a report has not been obtained. The cumulative effect of this rule, over time, would allow significant amounts of indigenous vegetation to be eliminated.	Amend IB-R3 to make more restrictive (inferred)
<b>Carbon Neutral NZ Trust (S529)</b>	S529.123	Ecosystems and indigenous biodiversity	IB-R3	Oppose	Rules IB-R3 and IB-R4 allow clearance of indigenous vegetation up to 100m2 per calendar year in areas confirmed (by ecological assessment) to be SNAs and in areas where a report has not been obtained. The cumulative effect of this rule, over time, would allow significant amounts of indigenous vegetation to be eliminated. In areas that are considered not to meet the criteria for a SNA, rule IB-R4 allows clearance of 500m2 in most zones, and up to 5,000m2 clearance of indigenous vegetation in rural production and horticulture zone if not in a remnant forest.	Amend rule IB-R3
<b>Carbon Neutral NZ Trust (S529)</b>	S529.127	Ecosystems and indigenous biodiversity	IB-R3	Support in part	The PDP provisions do not address some on-going practical problems with vegetation clearance, which often involved heavy machinery. For example, local conservation groups have experienced cases in recent years where landowners claim they are only or primarily clearing exotic vegetation, even when the destruction of a significant amount of indigenous vegetation is clearly visible on the site. To address this problem, PDP rules on clearance need to apply to vegetation that includes indigenous vegetation. The clearance of any type of vegetation, including plantation forests, can cause problems in areas where at-risk species are present. Local conservation groups have found that substantial areas of exotic or mixed vegetation have been cleared by large diggers or bulldozers without any precautions or regard for vulnerable types of indigenous species that are present or nesting on the ground or in the vegetation (eg. nesting kiwis, rare native lizards).	Amend Rule IB-R3 to apply to vegetation that includes indigenous vegetation

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<b>Marianna Fenn (S542)</b>	S542.013	Ecosystems and indigenous biodiversity	IB-R3	Oppose	Allowing for yearly 100m2 clearance of vegetation likely to result in incremental degradation and loss of SNAs. Some SNA areas may be so rare or vulnerable that consent should be required for any clearance or disturbance	Amend to reduce the threshold for clearance to 50 square meters every 5 years; and Separately identify particularly SNAs that include particularly rare or vulnerable indigenous biodiversity and require consent for any clearance or disturbance of these areas
<b>Te Rūnanga o Ngāti Rēhia (S559)</b>	S559.016	Ecosystems and indigenous biodiversity	IB-R3	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-R3 and redraft with tangata whenua (inferred).
<b>Martin John Yuretich (S40)</b>	S40.007	Ecosystems and indigenous biodiversity	IB-R4	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	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</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	<p>undertake mapping and identification of SNAs under the NPS-IB)</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>• 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>	S41.007	Ecosystems and indigenous biodiversity	IB-R4	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 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</li> </ul>

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						<p>the natural biodiversity of their land</p> <ul style="list-style-type: none"> <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>Colin James McLeod (S58)</b>	S58.001	Ecosystems and indigenous biodiversity	IB-R4	Oppose	The submitter opposes the permitted standard of 500m2 for indigenous vegetation clearance and any associated land disturbance outside a significant natural area, in zones other than Rural Production, Horticulture, Māori Purpose and Treaty Settlement Land overlay, over a 5-year period, and considers the area to be too small.	Delete IB-R4 Per-2(i) (inferred). "Overturn the decision to clear only 500m2 in 5 years. Allow any number of activities to take place on newly cleared land with permits perhaps. Regrowth of indigenous vegetation could be allowed but weeds should be managed and proof of this should be welcomed by the council and wider community."
<b>Diane Gardiner (S59)</b>	S59.001	Ecosystems and indigenous biodiversity	IB-R4	Oppose	<p>Rule IB-R4 2i provides for clearance outside an SNA where it does not exceed the following amounts per site over a 5-year period:</p> <ul style="list-style-type: none"> <li>- Rural Production zone, Horticulture zone, Māori Purpose zone and Treaty Settlement Land Overlay - 5,000m<sup>2</sup> if not in a remnant forest, otherwise 500m<sup>2</sup> in a remnant forest.</li> </ul> <p>Landowner's property includes a non-remnant forest and this is regrowth of Ti tree over productive fertile land. We clear the land, allow regeneration and maintain weed control. Change or abolish the stated land area relating to non-remnant forest as it will affect many livelihoods in the Far North.</p>	Amend or delete the land area stated for non-remnant forest. Request that ODP provisions be retained or increase the threshold before resource consent is required.

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<b>Robyn Josephine Baker (S69)</b>	S69.001	Ecosystems and indigenous biodiversity	IB-R4	Oppose	<p>It is totally unacceptable for FNDC to essentially 'take' land without market rate compensation. These rules appear to have the same effect as the previously tabled SNA proposals which were supposedly discarded when the ratepayers made their feelings very clear to the government.</p> <p>We have purchased this land and worked hard to clear it of noxious vegetation this includes, at our own expense and physical effort, removing gorse, tobacco weed, Australian Sedge and Ragwort.</p> <p>It is completely unreasonable that we should have to pay an ecologist to prove that our small amount of regenerated 'Native Bush' is not an SNA.</p> <p>Given that our Title already includes covenanted land that we are protecting - as is the case for most land owners in the area.</p> <p>We believe that FNDC should not be legally allowed to commandeer any further land by underhand means as is proposed.</p> <p>That these policies are being forced down from 'the top', where 'the top' exists outside of NZ, makes a complete mockery of NZ as a supposed democracy.</p> <p>SUB-R17 serves no useful purpose. A subdivided SNA is still a SNA.</p>	Amend IB-R4 PER-2 to allow unlimited area to be cleared per calendar year in Rural Production Zone. Or at a minimum, whatever the previous district plan allowed.
<b>Strand Homes Ltd/Okahu Developments Ltd (S77)</b>	S77.006	Ecosystems and indigenous biodiversity	IB-R4	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</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</li> </ul>

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					bill for the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.	<p>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>
PF Olsen Limited (S91)	S91.008	Ecosystems and indigenous biodiversity	IB-R4	Oppose	<p>Indigenous vegetation and indigenous vegetation clearance are not defined in the plan. Rule IB-R4 requires anyone wishing to undertake any indigenous vegetation in any zone to engage an ecologist to determine if the indigenous vegetation to be cleared is a Significant Natural Area for any clearance greater than 100 m2 (that is any area of 10 x 10 metres). An overgrown residential garden could trigger this rule.</p> <p>The section 32 analysis explores the rationale for not mapping and including SNA maps in the Plan. The approach was to provide a process where SNAs can be identified, assessed and managed using indigenous vegetation clearance thresholds and resource consent processes. The rhetoric in the S32 presents an unattractive proposition for land managers required to obtain</p>	Delete Rule IB-R4 or amend it to not require consent holders to obtain an ecologists report to prove that the indigenous vegetation is not a SNA; and Council undertake ground truth potential SNA's and after appropriate consultation with affected landowners and land managers, introduce the agreed and mapped SNAs into the plan by way of plan change.

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					<p>resource consent.                      The requirement for individuals to obtain the ecological assessment for SNAs places a costly burden on resource consent applicants (essentially requiring private individuals to provide and fund public good) and will result in significant delays in obtaining consent as there is a lack of suitably qualified and experienced ecologists available at any time to do this work.</p>	
<p><b>Lynley Newport (S131)</b></p>	<p>S131.001</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-R4</p>	<p>Support in part</p>	<p>The submitter considers IB-R4 to be overly restrictive, particularly if the indigenous vegetation is not SNA and there is an ecologist report confirming this. The submitter also considers that the Rural Lifestyle zone should not be with all other zones as the lot sizes in this zone might be as large as 4ha.</p>	<p>Amend IB-R4 to read:                      PER-1</p> <ol style="list-style-type: none"> <li>1. A report has been obtained from a suitably qualified and experienced ecologist confirming that the indigenous vegetation does not meet the criteria for a Significant Natural Area and it is submitted to Council 14 days in advance of the clearance being undertaken; and</li> <li>2. It does not exceed the following amounts per site over a 5-year period:                             <ol style="list-style-type: none"> <li>1. Rural Production zone, Horticulture zone, Māori Purpose zone and Treaty Settlement Land Overlay - 1 hectare if not in a remnant forest, otherwise 500m2 in a remnant forest;</li> <li>2. Rural Lifestyle Zone - 1000m2 if not in remnant forest, otherwise 500m2 in a remnant forest;</li> <li>3. All other zones - 500m2.</li> </ol> </li> </ol>

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<b>Trevor John Ashford (S146)</b>	S146.007	Ecosystems and indigenous biodiversity	IB-R4	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 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> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>



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<b>Summit Forests New Zealand Limited (S148)</b>	S148.022	Ecosystems and indigenous biodiversity	IB-R4	Oppose	Requires a landowner needing to undertake any indigenous vegetation clearance in excess of 100m <sup>2</sup> to engage a suitable ecologist to confirm that the indigenous vegetation does not meet the criteria. These compliance costs are potentially onerous and pushes the costs of a public good onto private landowners. The section 32 analysis for Ecosystems and Indigenous Biodiversity acknowledges the downsides of this approach and it is certainly contrary to Policy IB-P5.	Delete the requirement for a landowner to obtain an ecologist's report proving an area is not an SNA, or in the alternative establish a process whereby Council fully funds such reports when associated with primary production activity.
<b>Shanon Garton (S161)</b>	S161.006	Ecosystems and indigenous biodiversity	IB-R4	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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						<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>Julianne Sally Bainbridge (S163)</b>	S163.010	Ecosystems and indigenous biodiversity	IB-R4	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 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 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 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>
<b>Bentzen Farm Limited (S167)</b>	S167.024	Ecosystems and indigenous biodiversity	IB-R4	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. Without mapping</p>	Delete Rule IB-R4

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>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>The rule lacks precision necessary for a permitted activity and imposes an unfair cost and burden on landowners to identify SNA areas. The rule is unfairly structured such that the areas are assumed SNA unless proven otherwise by landowners and, as such, does not satisfy the requirements of section 32 of the RMA 1991.</p>	
<p><b>Setar Thirty Six Limited (S168)</b></p>	<p>S168.031</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-R4</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.</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, the rule includes the requirement that "a report has been obtained from a suitably qualified and experienced ecologist confirming that the indigenous vegetation does not meet the criteria for a Significant Natural Area and it is submitted to Council 14 days in advance of the clearance being undertaken". This requirement lacks precision necessary for a permitted activity, and imposes an unfair cost and burden on landowners to identify SNA areas. The rule is unfairly structured such that the areas are</p>	<p>Delete Rule IB-R4</p>

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					assumed SNA unless proven otherwise by landowners and, as such, does not satisfy of section 32 of the RMA 1991.	
<b>NZ Agricultural Aviation Association (S182)</b>	S182.017	Ecosystems and indigenous biodiversity	IB-R4	Oppose	oppose limiting the clearance of indigenous vegetation in the Rural production zone, Horticulture zone, Māori Purpose zone and the Treaty Settlement Land Overlay to 5,000m2 if not in a remnant forest, otherwise 500m2 in a remnant forest. retain the 2ha limit in the operative district plan.	Amend Rule IB-R4 PER-1 2.i. Rural Production zone, Horticulture zone, Māori Purpose zone and Treaty Settlement Land Overlay - <del>5,000m2</del> <b>20,000m2</b> if not in a remnant forest, otherwise 500m2 in a remnant forest;
<b>The Shooting Box Limited (S187)</b>	S187.024	Ecosystems and indigenous biodiversity	IB-R4	Oppose	Refer to submission for detailed reasons for decision(s) requested relating, but not limited to, the following: reasons provided in the Ecosystems and Indigenous Biodiversity overview section; and how areas are assumed SNA unless proven otherwise by landowners, and, as such, does not satisfy the requirements of section 32 of the RMA 1991.	Delete Rule IB-R4
<b>Thomson Survey Ltd (S196)</b>	S196.001	Ecosystems and indigenous biodiversity	IB-R4	Support in part	Some rules are overly restrictive, particularly if indigenous vegetation is not an SNA. Consider whether Rural Lifestyle Zone is most appropriately lumped together with " all other zones" or whether there should be some recognition that lot sizes in this zone might be as large as 4ha. Support the default to discretionary activity status where performance standards are not achieved.	Amend IB-R4 PER-1, clause 2: It does not exceed the following amounts per site over a 5-year period: i. Rural Production Zone, Horticulture Zone, Māori Purpose Zone and Treat Settlement Zone Overlay - <del>5,000m2</del> <b>1 hectare</b> if not in a remnant forest, otherwise 500m2 in a remnant forest; ii. <b>Rural Lifestyle Zone, 1,000m2 if not a remnant forest, otherwise 500m2 in a remnant forest;</b> iii. All other zones - 500m2 Retain the default to discretionary activity status

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						where performance standards are not achieved.
<b>Wendover Two Limited (S222)</b>	S222.031	Ecosystems and indigenous biodiversity	IB-R4	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>In addition, the rule includes the requirement that "a report has been obtained from a suitably qualified and experienced ecologist confirming that the indigenous vegetation does not meet the criteria for a Significant Natural Area and it is submitted to Council 14 days in advance of the clearance being undertaken". This requirement lacks precision necessary for a permitted activity, and imposes an unfair cost and burden on landowners to identify SNA areas. The rule is unfairly structured such that the areas are assumed SNA unless proven otherwise by landowners and, as such, does not satisfy the requirements of section 32 of the RMA 1991.</p>	Delete Rule IB-R4

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<b>Matauri Trustee Limited (S243)</b>	S243.033	Ecosystems and indigenous biodiversity	IB-R4	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-by-case assessment by landowners as proposed, risk not being consistently applied.	Delete Rule IB-R4
<b>Willowridge Developments Limited (S250)</b>	S250.009	Ecosystems and indigenous biodiversity	IB-R4	Oppose	It is considered that the provisions as notified are overly onerous as they require an assessment of all areas of indigenous vegetation to be undertaken to determine whether compliance with the permitted activity thresholds. The provisions need to be reconsidered, with appropriate indigenous vegetation clearance thresholds proposed to allow plan users and decision-makers to easily determine compliance.	Amend IB-R4 to include maximum clearance thresholds.
<b>Arahia Burkhardt Macrae (S255)</b>	S255.005	Ecosystems and indigenous biodiversity	IB-R4	Oppose	This rule provides for an inadequate amount of clearance and land disturbance on sites where there is a lot of indigenous vegetation and/or significant natural area by virtue of the fact that the land owner has retained or protected it. PER-1 imposes a cost burden to engage a "suitably qualified and experienced ecologist" to meet the permitted standard. It is perverse to penalise a landowner if they wish to carry out a land use activity if the majority of the indigenous vegetation or significant natural area on the site remains protected and retained.	Amend rule to increase the amount of permitted activity clearance and land disturbance for sites where there is a protection mechanism in place (such as provided for in SUB-R6 Environmental Benefit Subdivision rule).

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<b>Manu Burkhardt Macrae (S279)</b>	S279.006	Ecosystems and indigenous biodiversity	IB-R4	Support	This rule provides for an inadequate amount of clearance and land disturbance on sites where there is a lot of indigenous vegetation and/or significant natural area by virtue of the fact that the land owner has retained or protected it. Per-1 imposes a cost burden to engage a 'suitably qualified and experienced ecologist to meet the permitted standard. Per-2 provides for an inadequate amount of clearance and disturbance without a report. It is a perverse to penalise such a landowner if they wish to then carry out a land use activity which requires vegetation clearance or land disturbance while at the same time still retaining or protecting the majority of the indigenous vegetation or significant natural area on the site.	Provide for an increase in the amount of permitted activity clearance and land disturbance for sites where there is a protection mechanism in place such as provided for in the SUB-R6 Environmental benefit subdivision rule. This would reward landowners who already have protection and incentivise landowners to protect.
<b>Tristan Simpkin (S287)</b>	S287.004	Ecosystems and indigenous biodiversity	IB-R4	Oppose	This rule therefore means that even the smallest group of trees will require an ecologist report, adding several thousand dollars to many home builds across the district. Rules like this are not helping housing become more affordable at all.	Delete the rule in its entirety.
<b>P S Yates Family Trust (S333)</b>	S333.023	Ecosystems and indigenous biodiversity	IB-R4	Oppose	As above in the reasons for the changes to the Overview section. In addition, the rule includes the requirement that "a report has been obtained from a suitably qualified and experienced ecologist confirming that the indigenous vegetation does not meet the criteria for a Significant Natural Area and it is submitted to Council 14 days in advance of the clearance being undertaken". This requirement lacks precision necessary for a permitted activity, and imposes an unfair cost and burden on landowners to identify SNA areas. The rule is unfairly structured such that the areas are assumed SNA	Delete Rule IB-R4

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					unless proven otherwise by landowners and, as such, does not satisfy the requirements of section 32 of the RMA 1991.	
<b>Te Aupōuri Commercial Development Ltd (S339)</b>	S339.032	Ecosystems and indigenous biodiversity	IB-R4	Not Stated	The PDP excludes the mapping that was released as part of the Draft Plan, and while TACDL supports its removal, it is now unclear how these provisions will be applied, assessed and monitored. Rules IB-R1, IB-R3 and IB-R4 all reference SNA as permitted activity rules. Given there is no mapping to identify these areas, there is no means to assess compliance with the permitted standards except by providing a site-specific report prepared by a suitably qualified ecologist which is considered to be inappropriate as a permitted activity status. For these reasons, TACDL are concerned with this approach and seek amendments to the provisions as they have been notified.	Amend Rule IB-R4 to include maximum clearance thresholds to apply to indigenous biodiversity more generally.
<b>Sapphire Surveyors Limited (S348)</b>	S348.013	Ecosystems and indigenous biodiversity	IB-R4	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</li> </ul>



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>the natural biodiversity of their land</p> <ul style="list-style-type: none"> <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>	S355.024	Ecosystems and indigenous biodiversity	IB-R4	Support in part	The PDP excludes the mapping that was released as part of the Draft Plan, and while we support its removal, it is now unclear how these provisions will be applied, assessed and monitored. Rules IB-R1, IB-R3 and IB-R4 all reference SNA as permitted activity rules. Given there is no mapping to identify these areas, there is no means to assess compliance with the permitted standards except by providing a site-specific report prepared by a suitably qualified ecologist which is considered to be inappropriate as a permitted activity status. For these reasons, we are concerned with this approach and seek amendments to the provisions as they have been notified.	Amend IB-R4 to include maximum clearance thresholds to apply to indigenous biodiversity more generally.
<b>Sean Frieling (S357)</b>	S357.036	Ecosystems and indigenous biodiversity	IB-R4	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	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.

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					allow for smaller lot sizes in the rural production zone for any subdivision that provides protection of indigenous vegetation.	Make SNA mapping available to the public.
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.047	Ecosystems and indigenous biodiversity	IB-R4	Support in part	Rule IB-R4 in its current format does not appear to allow Council discretion to review the ecologist reports and request further information or formally list SNAs in Schedule 4 if it's clear the indigenous vegetation meets the definition of a SNA. The Director-General requests the rule be amended to ensure indigenous vegetation that meets the criteria for being a SNA is suitably protected.	Amend Rule IB-R4 to require resource consent as a controlled activity to enable greater Council oversight of the ecologist's report. Delete PER-2 of Rule IB-R4.
<b>Rua Hatu Trust (S377)</b>	S377.007	Ecosystems and indigenous biodiversity	IB-R4	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</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>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>
<p><b>Sean Jozef Vercammen (S395)</b></p>	<p>S395.007</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-R4</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.</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 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</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>Kerry-Anne Smith (S410)</b></p>	<p>S410.007</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-R4</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.</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 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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						<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>	S411.007	Ecosystems and indigenous biodiversity	IB-R4	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 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 Joseph and Jacqueline</b>	S439.007	Ecosystems and	IB-R4	Oppose	<p>After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above</p>	Amend Rule IB-R4:

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<p><b>Elizabeth Matthews (S439)</b></p>		<p>indigenous biodiversity</p>			<p>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>• 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>
<p><b>Kapiro Conservation Trust (S442)</b></p>	<p>S442.088</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-R4</p>	<p>Support in part</p>	<p>Per-1 Remnant Forests should qualify as SNAs under the broad RPS definition and as a likely Tier 1 SNA under the Forest &amp; Bird proposed framework. The extent of clearance allowed as a permitted activity is excessive, particularly given the climate and biodiversity crises and the national level focus on revegetation. Allowable clearance will add up to very large areas where land is held in multiple titles and over longer time periods. Justifiable</p>	<p>Amend Per-1(2)(l) to limit permitted clearance to 500 square meters every 5 years or restrict it to clearly defined purposes e.g., maintaining cleared pasture and fence lines. Delete Per-1(2)(i) references to clearance within a remnant forest Amend Per-2(2) to limit clearance of up to 50m2 every 5 years.</p>

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					<p>reasons for clearance could be provided by clearly defined exceptions related to particular activities e.g. maintaining fences and cleared farmland. How this rule will look will also be determined by whether SNAs are mapped in general. If they are not then will need to delete all threshold rules and restrict clearance in all identified / mapped SNAs and the list of important indigenous biodiversity Per-2 Clearance of up to 100m<sup>2</sup> in a potential SNA will result in incremental loss and degradation. Without the assessment then it will be very difficult to determine if significant natural areas are being cleared Also the note is inappropriate. This note will last the life of the plan and will cause plan users confusion.</p>	Delete Note.
<b>Kapiro Conservation Trust (S442)</b>	S442.153	Ecosystems and indigenous biodiversity	IB-R4	Support in part	<p>The existing rule is confusing and may provide little practical protection for areas of significant indigenous vegetation and habitats of indigenous fauna outside the coastal environment. Schedule 4 (Significant Natural Areas) is currently empty. There seems to be no real incentive for landowners to ask for areas of their land to be included within that schedule. Therefore, clearer district plan rules for indigenous vegetation clearance are needed.</p>	<p>Amend rule IB-R4 to clarify that consent is required for the clearance of indigenous vegetation covering more than 100m<sup>2</sup> per site per calendar year for areas outside the coastal environment (as in PER-2 of Rule IB-R4). If a report from a suitably qualified and experienced ecologist certifies that the vegetation or habitat is not significant, then the calendar year permitted clearance limits could be increased. Any remnant forest should be protected from clearance or subject to the clearance allowance for areas that meet the criteria for significant indigenous vegetation or significant habitats of indigenous fauna.</p>
<b>Kapiro Conservation Trust (S442)</b>	S442.184	Ecosystems and indigenous biodiversity	IB-R4	Oppose	<p>Remnant Forests should qualify as SNAs under the broad RPS definition and should be protected. The extent of clearance allowed as a permitted activity is excessive. Allowable</p>	<p>Amend to clarify whether this restriction on the area that can be cleared includes or is in addition to permitted clearance of</p>

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					clearance will add up to very large areas where land is held in multiple titles and over longer time periods. Justifiable reasons for clearance could be provided by clearly defined exceptions.	regenerating vegetation under IB-R1- PER1.
<b>Kapiro Conservation Trust (S442)</b>	S442.185	Ecosystems and indigenous biodiversity	IB-R4	Oppose	Clearance of up to 100m2 in a potential SNA will result in incremental loss and degradation.	Amend PER(2) to limit clearance of up to 50m2 every 5 years.
<b>Pacific Eco-Logic (S451)</b>	S451.009	Ecosystems and indigenous biodiversity	IB-R4	Support in part	The existing rule is confusing and may provide little practical protection for areas of significant indigenous vegetation and habitats of indigenous fauna outside the coastal environment. Schedule 4 (Significant Natural Areas) is currently empty. There seems to be no real incentive for landowners to ask for areas of their land to be included within that schedule. Therefore, clearer district plan rules for indigenous vegetation clearance are needed. Using the existing definition of the remnant forest, it is unlikely that such vegetation would be non-significant unless the area is very small and/or significantly damaged and/or surrounded by a larger area of young vegetation	Amend rule IB-R4 to clarify that consent is required for the clearance of indigenous vegetation covering more than 100m <sup>2</sup> per site per calendar year for areas outside the coastal environment (as in PER-2 of Rule IB-R4). If a report from a suitably qualified and experienced ecologist certifies that the vegetation or habitat is not significant, then the calendar year permitted clearance limits could be increased. Any remnant forest should be protected from clearance or subject to the clearance allowance for areas that meet the criteria for significant indigenous vegetation or significant habitats of indigenous fauna
<b>Waiaua Bay Farm Limited (S463)</b>	S463.033	Ecosystems and indigenous biodiversity	IB-R4	Oppose	The 500 m <sup>2</sup> limit per 5-year period (i.e., an average of 100 m <sup>2</sup> per year) that would apply to the Special Purpose Zones under rule IB-R4 PER-1(2)(ii) is not supported. In the case of the KCZ Golf Living subzone, development will largely (if not entirely) avoid Significant Natural Areas ("SNAs"). However, the scale of development (up to 60 residential lots) anticipated by the Proposed Plan means clearance outside SNAs could easily exceed the modest permitted limit, by way of unavoidable impacts on scattered indigenous	Amend point 2. of PER-1 of Rules IB-R4 as follows: 2. It does not exceed the following amounts per site over a 5-year period: i. Rural Production zone, Horticulture zone, Māori Purpose zone, <del>and</del> Treaty Settlement Land Overlay <b>and Kauri Cliffs Golf Living subzone</b> - 5,000 m <sup>2</sup> if not in a remnant forest,



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					<p>vegetation. Given the purposes and anticipated development in the KCZ, WBF considers that this rule could appropriately be amended to provide for the KCZ Golf Living subzone (and potentially, for other Special Purpose Zones) similarly to the allowance made under sub-clause PER-1(2)(i).</p>	<p>otherwise 500 m<sup>2</sup> in a remnant forest; ii. All other zones - 500 m<sup>2</sup>.</p>
<p><b>LJ King Ltd (S464)</b></p>	<p>S464.007</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-R4</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>Helmut Friedrich Paul Letz and Angelika Eveline Letz (S470)</b>	S470.007	Ecosystems and indigenous biodiversity	IB-R4	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 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>Michael Foy (S472)</b>	S472.044	Ecosystems and indigenous biodiversity	IB-R4	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</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</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>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 the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<p>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>Adams-Te Whata Whanau Trust (S473)</b></p>	<p>S473.002</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-R4</p>	<p>Oppose</p>	<p>my concern is that there is a blanket limit of 100 square metres where no report has been obtained from a suitable qualified and experienced ecologist. There is one situation in which it would be very unwise to set a limit and that when a fire- break is urgently required to prevent a fire spreading to large areas of indigenous fauna/bush or commercial forest plantations.</p>	<p>amend IB-R4 PER-2 Note: This rule shall not apply to fire-breaks urgently to prevent the spread of fire to indigenous and other bush/ forest areas.</p>
<p><b>Tracy and Kenneth Dalton (S479)</b></p>	<p>S479.019</p>	<p>Ecosystems and</p>	<p>IB-R4</p>	<p>Oppose</p>	<p>The PDP excludes the mapping that was released as part of the Draft Plan, and while we support its removal, it is now unclear how these</p>	<p>Amend IB-R4 to include maximum clearance thresholds to apply to indigenous biodiversity more</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
		indigenous biodiversity			provisions will be applied, assessed and monitored. Rules IB-R1, IB-R3 and IB-R4 all reference SNA as permitted activity rules. Given there is no mapping to identify these areas, there is no means to assess compliance with the permitted standards except by providing a site-specific report prepared by a suitably qualified ecologist which is considered to be inappropriate as a permitted activity status. For these reasons, we are concerned with this approach and seek amendments to the provisions as they have been notified.	generally.
<b>Elbury Holdings (S485)</b>	S485.046	Ecosystems and indigenous biodiversity	IB-R4	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 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>
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.069	Ecosystems and indigenous biodiversity	IB-R4	Support in part	<p>Per-1 Remnant Forests should qualify as SNAs under the broad RPS definition and as a likely Tier 1 SNA under the Forest &amp; Bird proposed framework. The extent of clearance allowed as a permitted activity is excessive, particularly given the climate and biodiversity crises and the national level focus on revegetation. Allowable clearance will add up to very large areas where land is held in multiple titles and over longer time periods. Justifiable reasons for clearance could be provided by clearly defined exceptions related to particular activities e.g. maintaining fences and cleared farmland. How this rule will look will also be determined by whether SNAs are mapped in general. If they are not then will need to delete all threshold rules and restrict clearance in all identified / mapped SNAs and the list of important indigenous biodiversity Per-2 Clearance of up to 100m2 in a potential SNA will result in incremental loss and degradation. Without the assessment then it will be very difficult to determine if significant natural areas are being cleared Also the note is inappropriate. This note will last the life of the plan and will cause plan users confusion</p>	<p>Amend Per-1(2)(l) to limit permitted clearance to 500 square meters every 5 years or restrict it to clearly defined purposes e.g., maintaining cleared pasture and fence lines. Delete Per-1(2)(i) references to clearance within a remnant forest Amend Per-2(2) to limit clearance of up to 50m2 every 5 years. Delete Note</p>
<b>Elbury Holdings (S519)</b>	S519.046	Ecosystems and indigenous biodiversity	IB-R4	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</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</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					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>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>
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527)</b>	S527.008	Ecosystems and indigenous biodiversity	IB-R4	Oppose	In areas that are considered not to meet the criteria for a SNA, rule IB-R4 allows clearance of 500m2 in most zones, and up to 5,000m2 clearance of indigenous vegetation in rural production and horticulture zone if not in a remnant forest.	Amend to make IB-R4 more restrictive (inferred)
<b>Carbon Neutral NZ Trust (S529)</b>	S529.124	Ecosystems and indigenous biodiversity	IB-R4	Oppose	Rules IB-R3 and IB-R4 allow clearance of indigenous vegetation up to 100m2 per calendar year in areas confirmed (by ecological assessment) to be SNAs and in areas where a report has not been obtained. The cumulative effect of this rule, over time, would allow significant amounts of indigenous vegetation to be eliminated. In areas that are considered not to meet the criteria for a SNA, rule IB-R4 allows clearance of 500m2 in most zones, and up to 5,000m2 clearance of indigenous vegetation in	Amend rule IB-R4

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					rural production and horticulture zone if not in a remnant forest	
<b>Carbon Neutral NZ Trust (S529)</b>	S529.128	Ecosystems and indigenous biodiversity	IB-R4	Support in part	The PDP provisions do not address some on-going practical problems with vegetation clearance, which often involved heavy machinery. For example, local conservation groups have experienced cases in recent years where landowners claim they are only or primarily clearing exotic vegetation, even when the destruction of a significant amount of indigenous vegetation is clearly visible on the site. To address this problem, PDP rules on clearance need to apply to vegetation that includes indigenous vegetation. The clearance of any type of vegetation, including plantation forests, can cause problems in areas where at-risk species are present. Local conservation groups have found that substantial areas of exotic or mixed vegetation have been cleared by large diggers or bulldozers without any precautions or regard for vulnerable types of indigenous species that are present or nesting on the ground or in the vegetation (eg. nesting kiwis, rare native lizards).	Amend rule IB-R4 to apply to vegetation that includes indigenous vegetation.
<b>Elbury Holdings (S541)</b>	S541.007	Ecosystems and indigenous biodiversity	IB-R4	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> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<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>	S542.014	Ecosystems and indigenous biodiversity	IB-R4	Oppose	Remnant Forests should qualify as SNAs under the broad RPS definition and should be protected. The extent of clearance allowed as a permitted activity is excessive. Allowable clearance will add up to very large areas where land is held in multiple titles and over longer time periods. Justifiable reasons for clearance could be provided by clearly defined exceptions.	Amend to clarify whether this restriction on the area that can be cleared includes or is in addition to permitted clearance of regenerating vegetation under IB-R1- PER1
<b>Marianna Fenn (S542)</b>	S542.015	Ecosystems and indigenous biodiversity	IB-R4	Oppose	Clearance of up to 100m2 in a potential SNA will result in incremental loss and degradation.	Amend (2) to limit clearance of up to 50m2 every 5 years.
<b>LJ King Limited (S543)</b>	S543.007	Ecosystems and indigenous biodiversity	IB-R4	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	<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</li> </ul>



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					<p>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>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>Kelvin Richard Horsford (S544)</b></p>	<p>S544.007</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-R4</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.</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 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),</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>not disincentives, for landowners 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>LJ King Limited (S547)</b></p>	<p>S547.007</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-R4</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.</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 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</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>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>Te Rūnanga o Ngāti Rēhia (S559)</b>	S559.017	Ecosystems and indigenous biodiversity	IB-R4	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, 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.</p>	Delete IB-R4 and redraft with tangata whenua (inferred).
<b>Rodney S Gates and Cherie R Gates (S569)</b>	S569.007	Ecosystems and indigenous biodiversity	IB-R4	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 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</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</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	<p>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>PF Olsen Limited (S91)</b>	S91.007	Ecosystems and indigenous biodiversity	IB-R5	Oppose	<p>The rule is too wide given the definition of plantation forestry activities and also in terms of how a Significant Natural Area is considered in the exposure draft of the National Policy Statement for Indigenous Biodiversity. To make plantation forestry and plantation forestry activities a discretionary activity is unnecessarily restrictive and does not recognise the provisions for SNA's in the National Environmental Standards from Plantation Forestry.</p> <p>The rule does not support the policy intent, especially clause b of IB-P5.</p> <p>No justification for the plantation forestry rule has been presented. Just because regulation 6 of the NES-PF enables this, that in itself is not justification.</p>	Delete rule IB-R5 and/or reconsider the need for it in terms of the National Environmental Standards for Plantation Forestry (e.g. if the clearance of indigenous vegetation meets the thresholds in the NES-PF, then it should be a permitted activity).
<b>Summit Forests New Zealand Limited (S148)</b>	S148.021	Ecosystems and indigenous biodiversity	IB-R5	Oppose	Makes plantation forestry and plantation forestry activities within an SNA a discretionary activity. This is potentially onerous especially as the SNA criteria established in the exposure draft of the National Policy Statement for Indigenous	Amend IB-R5 to only apply to the clearance of indigenous vegetation within a scheduled SNA within a plantation forest as a discretionary activity that does not

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					Biodiversity could see plantation forests captured within the definition of an SNA. As noted above, this rule also fails to provide for plantation forestry activity around the indigenous vegetation that will grow in the riparian and other setbacks that forest owners are required to establish. The NES-PF already provides a permitted activity regime for indigenous vegetation clearance associated with plantation forestry and plantation forestry activities and Council has not provided any justification for a higher standard, as required under section 32(4) of the RMA, nor the need to ignore its own Policy (IB-P5)	meet the requirements of regulation 93 of the NES-PF.
<b>Manulife Forest Management (NZ) Ltd (S160)</b>	S160.018	Ecosystems and indigenous biodiversity	IB-R5	Oppose	The submitter opposes rule IB-R5 and considers the discretionary activity status to be onerous and unnecessary. The lack of mapping of SNAs and the reliance of interpreting the definition or the use of a qualified expert is onerous and provides no certainty to the landowner.	Delete rule IB-R5 (implied) and Council needs to work with the industry to establish SNA boundaries. Understory, unused tracks/roads, set back areas, riparian zones all need to be managed differently to ensure plantation forestry activities can occur.
<b>Bentzen Farm Limited (S167)</b>	S167.025	Ecosystems and indigenous biodiversity	IB-R5	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.	Delete Rule IB-R5
<b>Setar Thirty Six Limited (S168)</b>	S168.032	Ecosystems and indigenous biodiversity	IB-R5	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	Delete Rule IB-R5

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>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.</p>	
<p><b>The Shooting Box Limited (S187)</b></p>	<p>S187.025</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-R5</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.</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>Delete Rule IB-R5</p>
<p><b>Wendover Two Limited (S222)</b></p>	<p>S222.032</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-R5</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</li> </ol>	<p>Delete Rule IB-R5</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>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><b>Matauri Trustee Limited (S243)</b></p>	<p>S243.034</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-R5</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.</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>Delete Rule IB-R5</p>
<p><b>P S Yates Family Trust (S333)</b></p>	<p>S333.024</p>	<p>Ecosystems and indigenous biodiversity</p>	<p>IB-R5</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</li> </ol>	<p>Delete Rule IB-R5</p>

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					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.	
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.048	Ecosystems and indigenous biodiversity	IB-R5	Support in part	To ensure consistency with the relief sought under proposed Rule IB-R3, Rule IB-R5 should be a non-complying activity.	Amend Rule IB-R5 to a non-complying activity status.
<b>Kapiro Conservation Trust (S442)</b>	S442.089	Ecosystems and indigenous biodiversity	IB-R5	Oppose	Plantation forestry within an SNA should be a non-complying activity.	Amend IB-R5 to non-complying activity status.
<b>Kapiro Conservation Trust (S442)</b>	S442.186	Ecosystems and indigenous biodiversity	IB-R5	Oppose	Plantation forestry within an SNA should be a non-complying activity.	Amend to non-complying activity status.
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.070	Ecosystems and indigenous biodiversity	IB-R5	Oppose	Plantation forestry within an SNA should be a non-complying activity.	Amend IB- R5 to non-complying activity status
<b>Marianna Fenn (S542)</b>	S542.016	Ecosystems and indigenous biodiversity	IB-R5	Oppose	Plantation forestry within an SNA should be a non-complying activity.	Amend to non-complying activity status



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<b>Te Rūnanga o Ngāti Rēhia (S559)</b>	S559.018	Ecosystems and indigenous biodiversity	IB-R5	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-R5 and redraft with tangata whenua (inferred).
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.049	Natural character	Overview	Support	The Director-General is generally supportive of the entire Natural Character chapter for giving effect to the NPS-FM.	Retain entire chapter as notified.
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.061	Natural character	Overview	Not Stated	Sentence 2 of the Overview fails to recognise that lake, wetland and riparian margins provide ecological connection ki uta ki tai and provide important habitats for some species (e.g. spawning native fish).	Amend Sentence 2 of the first paragraph of the Overview to read as follows: The margins of these waterbodies are areas of important and valued natural character and <b>provide ecological connection and habitats for native species</b> , support public and customary access, recreation and hazard management.
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.062	Natural character	Overview	Not Stated	Natural Character does not only relate to the margins of wetlands, lakes and rivers. The overview section mentions natural character in	Amend the overview, objectives and policies to address natural character of terrestrial

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					the Coastal Marine Area (as required by the NZCPS), but there are no policies or objectives relating to natural character except as it applies to the margins of wetlands, lakes and rivers.	ecosystems. This would include by providing objectives and policies relating to natural character outside the margins of wetlands, lakes and rivers.
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.140	Natural character	Overview	Support in part	<p>Natural character is a matter that Federated Farmers and its members are heavily invested in. This is a significant proportion of natural character located in the Far North and which has been preserved on farmland throughout the district.</p> <p>Our members are constantly improving riparian margins and natural character on their land through planting, fencing, and retiring land with natural character from use. All this is done largely at their expense. Federated Farmers supports the use non-regulatory measures to assist landowners to continue on this journey.</p> <p>It is important that the Council recognises and provides for in the district plan for activities that have a functional need to be located within an area of natural character. These activities are required to be located next to the resources that they utilise and cannot be located anywhere else. These activities need to be provided for as they form part of a working landscape.</p>	Insert a sentence in the Overview that recognises that some activities will have a functional need to be located within an area of natural character
<b>Russell Protection Society (INC) (S179)</b>	S179.072	Natural character	Objectives	Support	<p>In view of the fact that coastal zones are not provided for in the Proposed district plan, then the Coastal Environment, Natural Character and Natural Features and Landscape Overlays become very important in helping to define the boundaries of Russell and in safeguarding a suitable backdrop or canvass which to interpret and appreciate the historic township.</p> <p>It is especially important that these overlays provide adequate protection to the headlands framing Russell and the natural coastal escarpments that characterize the balance of the Russell Peninsula. For this reason it is important</p>	Retain objectives

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					to control subdivision and development of coastal lands in the area.	
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.063	Natural character	Objectives	Not Stated	Natural Character does not only relate to the margins of wetlands, lakes and rivers. The overview section mentions natural character in the Coastal Marine Area (as required by the NZCPS), but there are no policies or objectives relating to natural character except as it applies to the margins of wetlands, lakes and rivers.	Amend the overview, objectives and policies to address natural character of terrestrial ecosystems. This would include by providing objectives and policies relating to natural character outside the margins of wetlands, lakes and rivers.
<b>Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)</b>	S425.030	Natural character	Objectives	Support in part	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>Kapiro Conservation Trust (S442)</b>	S442.090	Natural character	Objectives	Support in part	Need to assess and map natural character areas as has been done for the coastal environment. The extent of these natural character areas should reflect the need to allow for change / retreat as a result of the effects of climate change. E.g. there should be buffer zones which anticipate future changes to their nature and/or extent.	Insert new objective "Assess and identify in district plan maps natural character areas around wetland, lake, and river margins" or similar. Insert new objective: "Provide for changes in the location and extent of natural character areas as a result of the effects of climate change, including inclusion of buffer areas to take into account increased flooding and the need for ecosystem retreat as a result of sea level rise."
<b>Kapiro Conservation Trust (S442)</b>	S442.187	Natural character	Objectives	Support in part	Need to assess and map natural character areas as has been done for the coastal environment. The extent of these natural character areas should allow for change / retreat as a result of the effects of climate change. E.g. buffer zones.	Insert new objective <b>Assess and identify in district plan maps natural character areas around wetland, lake, and river margins or similar.</b> Insert new objective <b>Identify and establish buffer zones</b>

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						<b>that encompass potential changes in the location and extent of natural character areas as a result of natural processes and the effects of climate change.</b>
<b>Top Energy Limited (S483)</b>	S483.151	Natural character	Objectives	Not Stated	It is critical that operation, maintenance, repair and upgrading of the electricity distribution network is appropriately provided for to ensure the continued resilience of this lifeline service throughout the District. Top Energy seeks amendments to this chapter to make sure that this is provided for all electricity infrastructure noting the potential for overlap with NES:FW	Insert additional objectives that recognise the need for the location of new infrastructure within the margins of waterbodies where there is an operational and functional need, and any adverse effects are adequately managed. Insert additional objective that provides for and enables the operation, maintenance, repair and upgrading of infrastructure within the margins of waterbodies.
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.071	Natural character	Objectives	Support in part	Need to assess and map natural character areas as has been done for the coastal environment. The extent of these natural character areas should reflect the need to allow for change / retreat as a result of the effects of climate change. E.g. there should be buffer zones which anticipate future changes to their nature and/or extent.	Insert new objective "Assess and identify in district plan maps natural character areas around wetland, lake, and river margins" or similar. Insert new objective "Provide for changes in the location and extent of natural character areas as a result of the effects of climate change, including inclusion of buffer areas to take into account increased flooding and the need for ecosystem retreat as a result of sea level rise."
<b>Marianna Fenn (S542)</b>	S542.017	Natural character	Objectives	Support in part	Need to assess and map natural character areas as has been done for the coastal environment. The extent of these natural character areas	Insert new objective <b>Assess and identify in district plan maps</b>

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					should allow for change / retreat as a result of the effects of climate change. E.g. buffer zones	<b>natural character areas around wetland, lake, and river margins or similar.</b> Insert new objective <b>Identify and establish buffer zones that encompass potential changes in the location and extent of natural character areas as a result of natural processes and the effects of climate change</b>
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.050	Natural character	NATC-O1	Support	The Director-General is generally supportive of the entire Natural Character chapter for giving effect to the NPS-FM.	Retain entire chapter as notified.
<b>Haititaimaran gai Marae Kaitiaki Trust (S394)</b>	S394.028	Natural character	NATC-O1	Support in part	The Proposed Plan must provide a broader scope of protection to ensure consistency with higher order instruments.	Amend Objective NATC-O1 as follows: <del>The natural character of w</del> <b>Wetland, lake and river margins are managed to ensure their long term preservation and protection of their values for future generations.</b>
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.143	Natural character	NATC-O1	Support in part	Federated Farmers does not support objectives NATC-O1 and NATC-O2 as currently drafted. The objectives are inconsistent with section 6(a) of the Resource Management Act 1991 which requires the protection of natural character from inappropriate subdivision, use, development. The objectives need to be amended to be consistent with section 6(a) of the Act.	Amend Objective NATC-O1 as follows: The natural character of wetland, lake and river margins are managed to ensure their long-term preservation <del>and protection</del> for future

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						generations <b>and protection against inappropriate use and development.</b> or wording with similar intent
<b>Waiaua Bay Farm Limited (S463)</b>	S463.034	Natural character	NATC-O1	Oppose	This objective appears to be a recombination of RMA s6(a) with the inclusion of a vague reference to "long-term" protection and a superfluous reference to "current and future generations". However, the objective fails to recognise the RMA s6(a) distinction regarding protection from inappropriate activities. The objective appears to envisage outright "preservation and protection" without recognition that some activities and the associated effects, may not necessarily be inappropriate.	Delete Objective NATC-O1
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527)</b>	S527.015	Natural character	NATC-O1	Support	not stated	Retain NATC-O1 as notified (inferred)
<b>Carbon Neutral NZ Trust (S529)</b>	S529.139	Natural character	NATC-O1	Support		Retain NATC-O1
<b>Director-General of Conservation (Department of Conservation) (S364)</b>	S364.051	Natural character	NATC-O2	Support	The Director-General is generally supportive of the entire Natural Character chapter for giving effect to the NPS-FM.	Retain entire chapter as notified.
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.144	Natural character	NATC-O2	Support in part	Federated Farmers does not support objectives NATC-O1 and NATC-O2 as currently drafted. The objectives are inconsistent with section 6(a) of the Resource Management Act 1991 which requires the protection of natural character from inappropriate subdivision, use, development. The objectives need to be amended to be consistent with section 6(a) of the Act.	Amend Objective NATC-O2 as follows: Land use, <b>development</b> and subdivision is consistent with and does not <b>inappropriately</b> compromise the

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						characteristics and qualities of the natural character of wetland, lake, and river margins or wording with similar intent
<b>Transpower New Zealand Ltd (S454)</b>	S454.088	Natural character	NATC-O2	Not Stated	A consequential amendment to this objective is required to ensure that the FNPDP gives effect to the NPSET as set out in the submission point on I-P2 above.	Amend objective NATC-O2 as follows: <b>Subject to I-Px</b> , Land use and subdivision is consistent with and does not compromise the characteristics and qualities of the natural character of wetland, lake and river margins.
<b>Waiaua Bay Farm Limited (S463)</b>	S463.035	Natural character	NATC-O2	Oppose	The requirement that development "...not compromise the characteristics and qualities of the natural character" is vague and a de-facto requirement to avoid all adverse effects, regardless of how negligible, and despite any net environmental gains that might be associated with a development proposal.	Amend Objective NATC-O2 as follows: NATC-O2 Land use and subdivision <del>is consistent with and does not compromise</del> <b>maintains or enhances</b> the characteristics and qualities of the natural character of wetland, lake and river margins.
<b>Russell Protection Society (INC) (S179)</b>	S179.073	Natural character	Policies	Support	In view of the fact that coastal zones are not provided for in the Proposed district plan, then the Coastal Environment, Natural Character and Natural Features and Landscape Overlays become very important in helping to define the boundaries of Russell and in safeguarding a suitable backdrop or canvass which to interpret and appreciate the historic township.	Retain policies

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					It is especially important that these overlays provide adequate protection to the headlands framing Russell and the natural coastal escarpments that characterize the balance of the Russell Peninsula. For this reason it is important to control subdivision and development of coastal lands in the area.	
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.064	Natural character	Policies	Not Stated	Natural Character does not only relate to the margins of wetlands, lakes and rivers. The overview section mentions natural character in the Coastal Marine Area (as required by the NZCPS), but there are no policies or objectives relating to natural character except as it applies to the margins of wetlands, lakes and rivers.	Amend the overview, objectives and policies to address natural character of terrestrial ecosystems. This would include by providing objectives and policies relating to natural character outside the margins of wetlands, lakes and rivers.
<b>Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)</b>	S425.031	Natural character	Policies	Support in part	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>Top Energy Limited (S483)</b>	S483.152	Natural character	Policies	Not Stated	It is critical that operation, maintenance, repair and upgrading of the electricity distribution network is appropriately provided for to ensure the continued resilience of this lifeline service throughout the District. Top Energy seeks amendments to this chapter to make sure that this is provided for all electricity infrastructure noting the potential for overlap with NES:FW	Insert additional policies that recognise the need for the location of new infrastructure within the margins of waterbodies where there is an operational and functional need, and any adverse effects are adequately managed. Insert additional policy that provides for and enables the operation, maintenance, repair and upgrading of infrastructure within the margins of waterbodies.
<b>Matauri Trustee Limited (S243)</b>	S243.035	Natural character	NATC-P1	Oppose	In the Proposed Plan, "Lake" has the same meaning as in section 2 of the RMA - "means a body of fresh water which is entirely or nearly surrounded by land". The Natural Character Chapter Rules, Objectives and Policies apply to lakes, without	Amend reference to lake in Policy NATC-P1 to exclude application to lakes with a bed less than 5ha in area and exclude a body of freshwater impounded by a dam.



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					<p>any limitation on the size of the lake.</p> <p>There are many small bodies of freshwater in the district which would qualify as a lake under this definition (including farm dams made by people), which do not contribute to natural character.</p> <p>The Operative District Plan applies the maximum setback rules to lakes only where the lakebed has an area of 8ha or more, with as lesser setback determined by a calculation against the area of the lake. The Operative Plan also defines a lake as "a permanent body of fresh water 5 or more hectares in area which is entirely or nearly surrounded by land".</p> <p>These alternative methods have not been assessed in the Section 32 report; however, both efficiently and effectively achieves the objective by targeting the rule to lakes most likely to exhibit natural character while minimising the costs of resource consent applications by not applying the full set back provisions to smaller lakes and dams</p> <p>Either option should be carried over into the Proposed Plan to ensure that the provisions relating to Wetland, Lake and River Margins in the Proposed Plan are targeted to larger lakes, which are more likely to contribute to natural character, and avoid the provisions apply to farm dams.</p> <p>See also the relief sought in this submission in relation to the Definition of "Wetland, Lake and River Margins" which would achieve the same outcome.</p>	
<p><b>Waka Kotahi NZ Transport Agency (S356)</b></p>	<p>S356.066</p>	<p>Natural character</p>	<p>NATC-P1</p>	<p>Oppose</p>	<p>The policy is considered too onerous to apply to all wetland, lake and river margins, and should only apply to Outstanding Natural Character Areas.</p>	<p>Amend to refer to only Outstanding Natural Character areas.</p>
<p><b>Director-General of Conservation (Department of</b></p>	<p>S364.052</p>	<p>Natural character</p>	<p>NATC-P1</p>	<p>Support</p>	<p>The Director-General is generally supportive of the entire Natural Character chapter for giving effect to the NPS-FM.</p>	<p>Retain entire chapter as notified.</p>

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<b>Conservation ) (S364)</b>						
<b>Haititaimaran gai Marae Kaitiaki Trust (S394)</b>	S394.029	Natural character	NATC-P1	Support in part	In the case of natural inland wetlands, loss of wetland extent must be avoided, their values protected and restoration promoted (including wetland margins) under the NPSFM 2020. In the case of rivers, loss of extent and values must be avoided, unless there is a functional need for the activity in that location and the effects of the activity are managed via the effect hierarchy. Operational need is not a relevant (or permissible) consideration.	Amend Policy NATC-P1 to ensure that it is not contrary to the NPSFM.
<b>Matauri Trustee Limited (S243)</b>	S243.036	Natural character	NATC-P2	Oppose	In the Proposed Plan, "Lake" has the same meaning as in section 2 of the RMA - "means a body of fresh water which is entirely or nearly surrounded by land". The Natural Character Chapter Rules, Objectives and Policies apply to lakes, without any limitation on the size of the lake. There are many small bodies of freshwater in the district which would qualify as a lake under this definition (including farm dams made by people), which do not contribute to natural character. The Operative District Plan applies the maximum setback rules to lakes only where the lakebed has an area of 8ha or more, with as lesser setback determined by a calculation against the area of the lake. The Operative Plan also defines a lake as "a permanent body of fresh water 5 or more hectares in area which is entirely or nearly surrounded by land". These alternative methods have not been assessed in the Section 32 report; however, both efficiently and effectively achieves the objective by targeting the rule to lakes most likely to exhibit natural character while minimising the costs of resource consent applications by not applying the full set back provisions to smaller lakes and dams Either option should be carried over into the	Amend reference to lake in Policy NATC-P2 to exclude application to lakes with a bed less than 5ha in area and exclude a body of freshwater impounded by a dam.

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					Proposed Plan to ensure that the provisions relating to Wetland, Lake and River Margins in the Proposed Plan are targeted to larger lakes, which are more likely to contribute to natural character, and avoid the provisions apply to farm dams. See also the relief sought in this submission in relation to the Definition of "Wetland, Lake and River Margins" which would achieve the same outcome.	
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.085	Natural character	NATC-P2	Support	The Director-General is generally supportive of the entire Natural Character chapter for giving effect to the NPS-FM.	Retain entire chapter as notified.
<b>Haititaimaran gai Marae Kaitiaki Trust (S394)</b>	S394.030	Natural character	NATC-P2	Support in part	In the case of natural inland wetlands, loss of wetland extent must be avoided, their values protected and restoration promoted (including wetland margins) under the NPSFM 2020. In the case of rivers, loss of extent and values must be avoided, unless there is a functional need for the activity in that location and the effects of the activity are managed via the effect hierarchy. Operational need is not a relevant (or permissible) consideration.	Amend Policy NATC-P2 to ensure that it is not contrary to the NPSFM.
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.145	Natural character	NATC-P2	Oppose	Federated Farmers does not support policy NATC-O2 as it is currently drafted in the proposed district plan. The policy is inconsistent with section 6(a) of the Resource Management Act 1991 as it links to an assessment guide which breaks natural character into outstanding and high. As previously discussed in this submission, Federated Farmers does not support the use of high natural character in the proposed district plan.	Delete the concept of high natural character from Policy NATC-O2 (NATC-P2 inferred) and associated Appendix 1 Mapping methods and criteria.
<b>Kapiro Conservation Trust (S442)</b>	S442.091	Natural character	NATC-P2	Support in part	Support identification and assessment of these natural character areas. Assessment and mapping needs to be undertaken for the entire district and included within the plan. The Coastal	Amend to include reference to maps of identified natural character areas inside and outside the coastal environment.

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					Environment Chapter does not address natural character of wetlands lakes and river margins.	
<b>Kapiro Conservation Trust (S442)</b>	S442.188	Natural character	NATC-P2	Support in part	Support identification and assessment of natural character areas but need to maps these throughout the district.	Amend to include reference to maps of identified natural character areas in both coastal and inland parts of the district.
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.072	Natural character	NATC-P2	Support in part	Support identification and assessment of these natural character areas. Assessment and mapping needs to be undertaken for the entire district and included within the plan. The Coastal Environment Chapter does not address natural character of wetlands lakes and river margins.	Amend to include reference to maps of identified natural character areas inside and outside the coastal environment
<b>Marianna Fenn (S542)</b>	S542.018	Natural character	NATC-P2	Support in part	Support identification and assessment of natural character areas but need to maps these throughout the district.	Amend to include reference to maps of identified natural character areas in both coastal and inland parts of the district.
<b>Horticulture New Zealand (S159)</b>	S159.055	Natural character	NATC-P3	Support	Clearance for biosecurity purposes is supported.	Retain subsection d of Policy NATC-P3
<b>Matauri Trustee Limited (S243)</b>	S243.037	Natural character	NATC-P3	Oppose	<p>In the Proposed Plan, "Lake" has the same meaning as in section 2 of the RMA - "means a body of fresh water which is entirely or nearly surrounded by land".</p> <p>The Natural Character Chapter Rules, Objectives and Policies apply to lakes, without any limitation on the size of the lake.</p> <p>There are many small bodies of freshwater in the district which would qualify as a lake under this definition (including farm dams made by people), which do not contribute to natural character.</p> <p>The Operative District Plan applies the maximum setback rules to lakes only where the lakebed has an area of 8ha or more, with as lesser setback determined by a calculation against the area of the lake. The Operative Plan also defines a lake as "a permanent body of fresh water 5 or more hectares in area which is entirely or nearly surrounded by land".</p> <p>These alternative methods have not been assessed in the Section 32 report; however,</p>	Amend reference to lake in Policy NATC-P3 to exclude application to lakes with a bed less than 5ha in area and exclude a body of freshwater impounded by a dam.

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					<p>both efficiently and effectively achieves the objective by targeting the rule to lakes most likely to exhibit natural character while minimising the costs of resource consent applications by not applying the full set back provisions to smaller lakes and dams</p> <p>Either option should be carried over into the Proposed Plan to ensure that the provisions relating to Wetland, Lake and River Margins in the Proposed Plan are targeted to larger lakes, which are more likely to contribute to natural character, and avoid the provisions apply to farm dams.</p> <p>See also the relief sought in this submission in relation to the Definition of "Wetland, Lake and River Margins" which would achieve the same outcome.</p>	
<b>Ministry of Education Te Tāhuhu o Te Mātauranga (S331)</b>	S331.045	Natural character	NATC-P3	Support	The submitter supports policy NATC-P3 as it enables indigenous vegetation removal and/or earthworks within wetland, lake and river margins where it is for the repair or maintenance of lawfully established activities, which can include educational facilities.	Retain NATC-P3, as proposed.
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.086	Natural character	NATC-P3	Support	The Director-General is generally supportive of the entire Natural Character chapter for giving effect to the NPS-FM.	Retain entire chapter as notified.
<b>Haititaimaran gai Marae Kaitiaki Trust (S394)</b>	S394.031	Natural character	NATC-P3	Support in part	<p>In the case of natural inland wetlands, loss of wetland extent must be avoided, their values protected and restoration promoted (including wetland margins) under the NPSFM 2020.</p> <p>In the case of rivers, loss of extent and values must be avoided, unless there is a functional need for the activity in that location and the effects of the activity are managed via the effect hierarchy.</p> <p>Operational need is not a relevant (or permissible) consideration.</p>	Amend Policy NATC-P3 to ensure that it is not contrary to the NPSFM.

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<b>John Andrew Riddell (S431)</b>	S431.159	Natural character	NATC-P3	Not Stated	The amendment is necessary in order to achieve the purpose of the Act.	Amend Policy NATC-P3 so that it is a 'provide for ' policy, not an 'enable' policy, and add a policy limit relating to any earthworks or indigenous vegetation clearance being the minimum necessary
<b>Kapiro Conservation Trust (S442)</b>	S442.092	Natural character	NATC-P3	Oppose	The reference to "enabling" is inappropriate in that it suggests the clearance and disturbance is a desirable activity. Suggests a highly permissive approach.	Amend NATC-P3 to "Allow for restricted amounts vegetation clearance ...".
<b>Kapiro Conservation Trust (S442)</b>	S442.189	Natural character	NATC-P3	Oppose	The reference to "enabling" suggests a highly permissive approach.	Amend to " <b>Allow for restricted amounts vegetation clearance ...</b> "
<b>Waiaua Bay Farm Limited (S463)</b>	S463.036	Natural character	NATC-P3	Support	WBF supports the enablement of indigenous vegetation removal and/or earthworks as set out in this policy.	Retain Policy NATC-P3
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.073	Natural character	NATC-P3	Oppose	The reference to "enabling" is inappropriate in that it suggests the clearance and disturbance is a desirable activity. Suggests a highly permissive approach	Amend NATC-P3 to "Allow for restricted amounts vegetation clearance ..."
<b>Marianna Fenn (S542)</b>	S542.019	Natural character	NATC-P3	Oppose	The reference to "enabling" suggests a highly permissive approach	Amend to <b>Allow for restricted amounts vegetation clearance ...</b> "
<b>Matauri Trustee Limited (S243)</b>	S243.038	Natural character	NATC-P4	Oppose	In the Proposed Plan, "Lake" has the same meaning as in section 2 of the RMA - "means a body of fresh water which is entirely or nearly surrounded by land". The Natural Character Chapter Rules, Objectives and Policies apply to lakes, without any limitation on the size of the lake. There are many small bodies of freshwater in the district which would qualify as a lake under this definition (including farm dams made by people), which do not contribute to natural character. The Operative District Plan applies the	Amend reference to lake in Policy NATC-P4 to exclude application to lakes with a bed less than 5ha in area and exclude a body of freshwater impounded by a dam.

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					<p>maximum setback rules to lakes only where the lakebed has an area of 8ha or more, with as lesser setback determined by a calculation against the area of the lake. The Operative Plan also defines a lake as "a permanent body of fresh water 5 or more hectares in area which is entirely or nearly surrounded by land".</p> <p>These alternative methods have not been assessed in the Section 32 report; however, both efficiently and effectively achieves the objective by targeting the rule to lakes most likely to exhibit natural character while minimising the costs of resource consent applications by not applying the full set back provisions to smaller lakes and dams</p> <p>Either option should be carried over into the Proposed Plan to ensure that the provisions relating to Wetland, Lake and River Margins in the Proposed Plan are targeted to larger lakes, which are more likely to contribute to natural character, and avoid the provisions apply to farm dams.</p> <p>See also the relief sought in this submission in relation to the Definition of "Wetland, Lake and River Margins" which would achieve the same outcome.</p>	
<b>Ministry of Education Te Tāhuhu o Te Mātauranga (S331)</b>	S331.046	Natural character	NATC-P4	Support	The submitter supports policy NATC-P4 as it acknowledges the Ministry may have an operational need to provide educational facilities for existing communities on wetland, lake and river margins.	Retain NATC-P4, as proposed.
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.067	Natural character	NATC-P4	Support	not stated	Retain NATC-P4 as notified
<b>Director-General of Conservation (Department of Conservation) (S364)</b>	S364.087	Natural character	NATC-P4	Support	The Director-General is generally supportive of the entire Natural Character chapter for giving effect to the NPS-FM.	Retain entire chapter as notified.

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<b>Haititaimaran gai Marae Kaitiaki Trust (S394)</b>	S394.032	Natural character	NATC-P4	Support in part	In the case of natural inland wetlands, loss of wetland extent must be avoided, their values protected and restoration promoted (including wetland margins) under the NPSFM 2020. In the case of rivers, loss of extent and values must be avoided, unless there is a functional need for the activity in that location and the effects of the activity are managed via the effect hierarchy. Operational need is not a relevant (or permissible) consideration.	Amend Policy NATC-P4 to ensure that it is not contrary to the NPSFM.
<b>Transpower New Zealand Ltd (S454)</b>	S454.089	Natural character	NATC-P4	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 policy NATC-P4 as follows: Provide for buildings or structures, and extensions to existing buildings or structures on wetland, lake and river margins where, <b>subject to Policy I-Px:</b>
<b>Waiaua Bay Farm Limited (S463)</b>	S463.037	Natural character	NATC-P4	Oppose	WBF supports the matters referred to under sub-clauses (a), (b) and (d) of this policy. However, it opposes sub-clause (c) on grounds of ambiguity as the outcome sought by the sub-clause is not apparent. It seemingly requires any activities that would not 'preserve the protection of' natural character to be avoided. As mentioned in WBF's comments on objectives NATC-O1 and NATC-O2, a requirement of this type is not considered to accurately reflect the obligations imposed by RMA s6(a0)	Delete point c. of Policy NATC-P4
<b>Te Waka Pupuri Putea Trust (S477)</b>	S477.014	Natural character	NATC-P4	Not Stated	As Kaitiaki, we are and have been acutely aware of the degradation of Papatuanuku (Earth mother) and all living things between her and Ranginui (Sky Father) and the unavoidable consequences that can be generally categorised as Climate Change issues since pre-colonial times until present.	Amend the Plan as required to be forward-thinking regarding climate-related issues as the geography of our rohe makes us more susceptible to these issues and their potentially dire consequences
<b>Matauri Trustee</b>	S243.039	Natural character	NATC-P5	Oppose	In the Proposed Plan, "Lake" has the same meaning as in section 2 of the RMA - "means a body of fresh water which is entirely or nearly	Amend reference to lake in Policy NATC-P5 to exclude application to lakes with a bed less than 5ha in



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<p><b>Limited (S243)</b></p>					<p>surrounded by land".                      The Natural Character Chapter Rules, Objectives and Policies apply to lakes, without any limitation on the size of the lake.                      There are many small bodies of freshwater in the district which would qualify as a lake under this definition (including farm dams made by people), which do not contribute to natural character.                      The Operative District Plan applies the maximum setback rules to lakes only where the lakebed has an area of 8ha or more, with as lesser setback determined by a calculation against the area of the lake. The Operative Plan also defines a lake as "a permanent body of fresh water 5 or more hectares in area which is entirely or nearly surrounded by land".                      These alternative methods have not been assessed in the Section 32 report; however, both efficiently and effectively achieves the objective by targeting the rule to lakes most likely to exhibit natural character while minimising the costs of resource consent applications by not applying the full set back provisions to smaller lakes and dams                      Either option should be carried over into the Proposed Plan to ensure that the provisions relating to Wetland, Lake and River Margins in the Proposed Plan are targeted to larger lakes, which are more likely to contribute to natural character, and avoid the provisions apply to farm dams.                      See also the relief sought in this submission in relation to the Definition of "Wetland, Lake and River Margins" which would achieve the same outcome.</p>	<p>area and exclude a body of freshwater impounded by a dam.</p>
<p><b>Director-General of Conservation (Department of</b></p>	<p>S364.088</p>	<p>Natural character</p>	<p>NATC-P5</p>	<p>Support</p>	<p>The Director-General is generally supportive of the entire Natural Character chapter for giving effect to the NPS-FM.</p>	<p>Retain entire chapter as notified.</p>

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<b>Conservation ) (S364)</b>						
<b>Haititaimaran gai Marae Kaitiaki Trust (S394)</b>	S394.033	Natural character	NATC-P5	Support in part	In the case of natural inland wetlands, loss of wetland extent must be avoided, their values protected and restoration promoted (including wetland margins) under the NPSFM 2020. In the case of rivers, loss of extent and values must be avoided, unless there is a functional need for the activity in that location and the effects of the activity are managed via the effect hierarchy. Operational need is not a relevant (or permissible) consideration.	Amend Policy NATC-P5 to ensure that it is not contrary to the NPSFM.
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.068	Natural character	NATC-P6	Support	not stated	Retain NATC-P6 as notified
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.089	Natural character	NATC-P6	Support	The Director-General is generally supportive of the entire Natural Character chapter for giving effect to the NPS-FM.	Retain entire chapter as notified.
<b>Haititaimaran gai Marae Kaitiaki Trust (S394)</b>	S394.034	Natural character	NATC-P6	Support in part	In the case of natural inland wetlands, loss of wetland extent must be avoided, their values protected and restoration promoted (including wetland margins) under the NPSFM 2020. In the case of rivers, loss of extent and values must be avoided, unless there is a functional need for the activity in that location and the effects of the activity are managed via the effect hierarchy. Operational need is not a relevant (or permissible) consideration.	Amend Policy NATC-P6 to ensure that it is not contrary to the NPSFM.
<b>John Andrew Riddell (S431)</b>	S431.160	Natural character	NATC-P6	Not Stated	The amendment is necessary in order to achieve the purpose of the Act.	Insert a further matter of consideration to Policy NATC-P6 as follows: <b>the extent to which the purposes of esplanade areas are provided for</b>

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Waiaua Bay Farm Limited (S463)	S463.038	Natural character	NATC-P6	Oppose	Sub-clauses (a) to (m) are a list of assessment matters that are inappropriate to be included in a policy. They do not provide direction about how to achieve the overarching objectives (NATC-O1 and NATC-O2). WBF recommends deletion of the policy and reliance on Policy NATC-P1 instead. If necessary, the assessment criteria can be relocated to rules and standards later in this chapter.	Delete Policy NATC-P6
Russell Protection Society (INC) (S179)	S179.074	Natural character	Rules	Support	In view of the fact that coastal zones are not provided for in the Proposed district plan, then the Coastal Environment, Natural Character and Natural Features and Landscape Overlays become very important in helping to define the boundaries of Russell and in safeguarding a suitable backdrop or canvass which to interpret and appreciate the historic township. It is especially important that these overlays provide adequate protection to the headlands framing Russell and the natural coastal escarpments that characterize the balance of the Russell Peninsula. For this reason it is important to control subdivision and development of coastal lands in the area.	Retain rules
Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)	S425.032	Natural character	Rules	Support in part	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.
Waiaua Bay Farm Limited (S463)	S463.040	Natural character	Rules	Support	WBF seeks the addition of a new rule to provide a restricted discretionary consenting pathway for the construction of walking trails in the High Natural Character ("HNC") overlay. WBF intends to provide guest/visitor amenity, and connectivity and amenity for future residents in the Golf Living subzone, by developing a modest trail network between key features of the property. Large areas of Kauri Cliffs are in the HNC overlay. Initial plans for the trail network indicate	Insert a new rule as follows: <b>NATC-R[X]Activity Status: Restricted DiscretionaryWhere:RDIS-1Tracks not for conservation or pest control purposes.Matters of discretion:1. The location and purpose of the proposed</b>

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					<p>that some walking tracks will intersect areas in the proposed HNC.                      In light of the purposes of the KCZ, that many areas in the HNC have been protected, maintained or enhanced through WBF's efforts over the years, it is considered reasonable to provide a consenting pathway for this activity.</p>	<p><b>track or fence, its alignment and potential adverse effects on the high natural character area, including fragmentation and loss of biodiversity;2. Whether any proposed indigenous vegetation disturbance associated with the activity will result in loss of habitat that supports or provides a key life function for 'threatened' or 'at risk' indigenous species; and3. The extent to which unavoidable adverse effects of the proposed indigenous vegetation disturbance associated with the activity on areas of significant biodiversity can be remedied or offset through established or new biodiversity restoration programmes.</b></p>
<p><b>Top Energy Limited (S483)</b></p>	<p>S483.153</p>	<p>Natural character</p>	<p>Rules</p>	<p>Not Stated</p>	<p>It is critical that operation, maintenance, repair and upgrading of the electricity distribution network is appropriately provided for to ensure the continued resilience of this lifeline service throughout the District.                      Top Energy seeks amendments to this chapter to make sure that this is provided for all electricity infrastructure noting the potential for overlap with NES:FW</p>	<p>Amend rules to permit 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 within the margins of waterbodies</p>

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<p><b>Carbon Neutral NZ Trust (S529)</b></p>	<p>S529.235</p>	<p>Natural character</p>	<p>Rules</p>	<p>Not Stated</p>	<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.</p> <p>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 (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: 'District plans must be reviewed and, if necessary, amended to give effect to the NPS-FM "as soon as reasonably practicable".</p>	<p>Amend the PDP to give full effect to the NPS - Freshwater Management 2020</p>

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					<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>	
<p><b>Kapiro Conservation Trust (S442)</b></p>	<p>S442.093</p>	<p>Natural character</p>	<p>Notes</p>	<p>Support</p>	<p>For some reason Note 2 only refers to the Earthworks chapter. When Rule NATC-R3 applies to both Earthworks and indigenous vegetation clearance. This note should also relate to the Ecosystems and Indigenous Biodiversity Chapter There may be further significant indigenous biodiversity beyond the areas identified as SNA in the overlays where preservation and protection is required in accordance with the RPS. As well there may be other vegetation that requires protection in alignment with the RPS, policy 4.4.1.</p>	<p>Amend notes The Earthworks and Ecosystems <b>and Indigenous Biodiversity</b> Chapter rules apply in addition to the earthwork and indigenous vegetation clearance rules in this overlay chapter, not instead of. In the event of a conflict between the earthworks <b>and ecosystems and indigenous biodiversity chapters</b> earthworks <b>indigenous vegetation rules</b>, the most stringent rule will apply.</p>

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Royal Forest and Bird Protection Society of New Zealand (S511)	S511.074	Natural character	Notes	Support	For some reason Note 2 only refers to the Earthworks chapter. When Rule NATC-R3 applies to both Earthworks and indigenous vegetation clearance. This note should also relate to the Ecosystems and Indigenous Biodiversity Chapter There may be further significant indigenous biodiversity beyond the areas identified as SNA in the overlays where preservation and protection is required in accordance with the RPS. As well there may be other vegetation that requires protection in alignment with the RPS, policy 4.4.1.	Amend notes The Earthworks <b>and Ecosystems and Indigenous Biodiversity</b> Chapter rules apply in addition to the earthwork and indigenous vegetation clearance rules in this overlay chapter, not instead of. In the event of a conflict between the earthworks <b>and ecosystems and indigenous biodiversity chapters</b> earthworks <b>indigenous vegetation rules</b> , the most stringent rule will apply.
Lynley Newport (S136)	S136.001	Natural character	NATC-R1	Oppose	There is no resource management based link between the height of a building or structure and its proximity to a wetland, lake or river margin. Setback distance and size of the building or structure maybe, but not height. If the wetland, lake or river margin is within an area identified as Outstanding Natural Feature or Outstanding Natural Landscape, then potentially the height may have an effect. There is no need for, or justification for PER-4.	Delete NATC-R1 PER-4
Summit Forests New Zealand Limited (S148)	S148.024	Natural character	NATC-R1	Not Stated	Not explicitly stated	Retain NATC-R1 and the provision of river crossings under PER-2.
Horticulture New Zealand (S159)	S159.056	Natural character	NATC-R1	Support	Provisions for pumphouses is supported.	Retain subsection 7 of PER-2 of Rule NATC-R1
Horticulture New Zealand (S159)	S159.057	Natural character	NATC-R1	Oppose	The maps identify areas of outstanding or high natural character, but the provisions apply generically to all-natural character. Seeks an approach that focuses on those areas identified	Amend Rule NATC-R1 to insert the following: <b>PER-5In areas that are not outstanding or</b>

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					as having outstanding or high natural character where potential for adverse effects is greatest. A 30m setback for all buildings and structures regardless of the degree of natural character is not supported. The application of a 30m setback from wetland, lake and river margins is not supported as a blanket provision and precludes optimal use of highly productive land	<p><b>high natural character provide for:</b></p> <ul style="list-style-type: none"> <li>• <b>Irrigation structures</b></li> <li>• <b>Crops support structures</b></li> <li>• <b>Artificial crop support structures with green or black cloth on vertical sides</b></li> </ul> <p><b>With a setback of 10m from a wetland, lake or river over 3m wide or 3m setback for wetland, lake or river less than 3m wide</b></p>
<b>Manulife Forest Management (NZ) Ltd (S160)</b>	S160.019	Natural character	NATC-R1	Support	The submitter supports rule, NATC-R1 PER-2, clause 5	Retain rule, NATC-R1 PER-2, clause 5 as it is written.
<b>Bentzen Farm Limited (S167)</b>	S167.026	Natural character	NATC-R1	Oppose	The provision is targeted only to effects on natural character and such potential effects can be properly anticipated when considering this activity class. As such the rule is more efficient and effective if restricted discretionary activity, rather than a full discretionary activity. The assessment matters set out in the relief sought are taken from policy NATC-P6, and provide a complete basis to assess likely and potential effects on natural character.	Amend rule NATC-R1 to change the activity status where compliance is not achieved with PER-2, PER-3 and PER-4 from discretionary to <b>restricted discretionary</b> , with discretion limited to the effects on natural character values as follows: <p>a. the presence or absence of buildings, structures or infrastructure;</p> <p>b. the temporary or permanent nature of any</p>



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						<p>adverse effects;</p> <p>c. the location, scale and design of any proposed development;</p> <p>d. any means of integrating the building, structure or activity;</p> <p>e. the ability of the environment to absorb change;</p> <p>f. the need for and location of earthworks or vegetation clearance;</p> <p>g. the operational or functional need of any regionally significant infrastructure to be sited in the particular location;</p> <p>h. any viable alternative locations for the activity or development;</p> <p>i. any historical, spiritual or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6;</p> <p>j. the likelihood of the activity exacerbating natural hazards;</p> <p>k. the opportunity to enhance public access and recreation;</p> <p>l. the ability to improve the overall water quality; and</p> <p>m. any positive contribution</p>

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						the development has on the characteristics and qualities.
<b>Matauri Trustee Limited (S243)</b>	S243.040	Natural character	NATC-R1	Oppose	<p>In the Proposed Plan, "Lake" has the same meaning as in section 2 of the RMA - "means a body of fresh water which is entirely or nearly surrounded by land".</p> <p>The Natural Character Chapter Rules, Objectives and Policies apply to lakes, without any limitation on the size of the lake.</p> <p>There are many small bodies of freshwater in the district which would qualify as a lake under this definition (including farm dams made by people), which do not contribute to natural character.</p> <p>The Operative District Plan applies the maximum setback rules to lakes only where the lakebed has an area of 8ha or more, with as lesser setback determined by a calculation against the area of the lake. The Operative Plan also defines a lake as "a permanent body of fresh water 5 or more hectares in area which is entirely or nearly surrounded by land".</p> <p>These alternative methods have not been assessed in the Section 32 report; however, both efficiently and effectively achieves the objective by targeting the rule to lakes most likely to exhibit natural character while minimising the costs of resource consent applications by not applying the full set back provisions to smaller lakes and dams</p> <p>Either option should be carried over into the Proposed Plan to ensure that the provisions relating to Wetland, Lake and River Margins in the Proposed Plan are targeted to larger lakes, which are more likely to contribute to natural character, and avoid the provisions apply to farm dams.</p> <p>See also the relief sought in this submission in relation to the Definition of "Wetland, Lake and</p>	Amend all reference to lakes in rule NATC-R1 to exclude application to lakes with a bed less than 5ha in area and exclude a body of freshwater impounded by a dam.

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					River Margins" which would achieve the same outcome.	
<b>Matauri Trustee Limited (S243)</b>	S243.044	Natural character	NATC-R1	Oppose	The provision is targeted only to effects on natural character and such potential effects can be properly anticipated when considering this activity class. As such the rule is more efficient and effective if restricted discretionary activity, rather than a full discretionary activity. The assessment matters set out in the relief sought are taken from policy NATC-P6, and provide a complete basis to assess likely and potential effects on natural character.	Amend rule NATC-R1 to change the activity status where compliance is not achieved with PER-2, PER-3 and PER-4 from discretionary to restricted discretionary, with discretion limited to the effects on natural character values as follows: <b>a. the presence or absence of buildings, structures or infrastructure;b. the temporary or permanent nature of any adverse effects;c. the location, scale and design of any proposed development;d. any means of integrating the building, structure or activity;e. the ability of the environment to absorb change;f. the need for and location of earthworks or vegetation clearance;g. the operational or functional need of any regionally significant infrastructure to be sited in the particular location;h. any viable alternative locations for the activity or development;i. any historical, spiritual or cultural association held by tangata whenua, with regard to the</b>

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						<p><b>matters set out in Policy TW-P6;j. the likelihood of the activity exacerbating natural hazards;k. the opportunity to enhance public access and recreation;l. the ability to improve the overall water quality; andm. any positive contribution the development has on the characteristics and qualities.</b></p>
<p><b>Ministry of Education Te Tāhuhu o Te Mātauranga (S331)</b></p>	<p>S331.047</p>	<p>Natural character</p>	<p>NATC-R1</p>	<p>Support in part</p>	<p>The submitter supports in part NATC-R1 New buildings or structures, and extensions or alterations to existing buildings or structures, as the Ministry may have an operational need to locate educational facilities on wetland, lake and river margins to provide for existing communities. Given the proposed policy NATC-P4 provides for the establishment of new buildings and extensions to existing buildings where there is an operational need to be located on wetland, lake and river margins, the Ministry recommends inclusion of activities which have an operational need to be located in the area (including educational facilities) to be included in the list of permitted activities to ensure consistency across the policies and rules.</p>	<p>Amend rule NATC-R1 New buildings or structures, and extensions or alterations to existing buildings or structures, as follows:            New buildings or structures, and extensions or alterations to existing buildings or structures            Activity status: Permitted            Where:            PER-1            The building or structure, or extension or alteration to an existing building or structure on wetland, lake and river margins is not located within an ONL or ONF.            PER-2            The building or structure, or extension or alteration to an existing building or structure on wetland, lake and river margins is required for:            1. restoration and enhancement purposes; or            2. natural hazard mitigation undertaken by, or on behalf of, the local authority; or</p>

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						<p>3. park management activity in the Open Space or Sport and active recreation zone; or</p> <p>4. a post and wire fence for the purpose of protection from farm stock.</p> <p>5. river crossings, including but not limited to, fords, bridges, stock crossings and culvert</p> <p>6. crossings.</p> <p>7. activities related to the construction of river crossings.</p> <p>8. pumphouses utilised for the drawing of water provided they cover less than 25m2 in area.</p> <p><b>9. an activity which has an operational need to be located in the area.</b></p> <p>PER-3 The building or structure on wetland, lake and river margins is no greater than 300m2.</p> <p>PER-4 The building or structure, or extension or alteration to an existing building or structure on wetland, lake and river margins complies with standard NATC-S1 Maximum height</p> <p>Activity status where compliance not achieved with PER-1: Non-complying</p> <p>Activity status where compliance not achieved with</p>

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						PER-2, PER-3 and PER-4: Discretionary
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.069	Natural character	NATC-R1	Oppose	The rule structure is too onerous to apply to all wetland, lake and river margins. It is also unclear how it is to be assessed.	Amend to only apply to Outstanding or High Natural Character Areas. Clarification is also sought as to how the rule applies to infrastructure provision.
<b>Director- General of Conservation (Department of Conservation ) (S364)</b>	S364.090	Natural character	NATC-R1	Support	The Director-General is generally supportive of the entire Natural Character chapter for giving effect to the NPS-FM.	Retain entire chapter as notified.
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.147	Natural character	NATC-R1	Support in part	Federated Farmers generally supports rules NATC-R1, NATC-R2 and NATC-R3 as set out in the district plan. It is considered that there is a need for the rules to provide for activities with a functional need to be located within a natural character area so long as the subdivision, use or development is not inappropriate for the area.	Amend Rule NATC-R1 to provide for activities that need to be located within a natural character area as long as the subdivision, use and development is not inappropriate for the area
<b>Northland Fish and Game Council (S436)</b>	S436.035	Natural character	NATC-R1	Not Stated	For the reasons set out under 'general submissions 'Maimai' of the submission (refer to submission points S436.003 to S436.006)" NFGC seek that maintenance of maimai be included in PER-2 of Rule NATC-R1.	Insert new point in PER-2 of Rule NATC-R1 as follows: <b>8. maintenance of an existing maimai.</b>
<b>Waiaua Bay Farm Limited (S463)</b>	S463.039	Natural character	NATC-R1	Oppose	WBF would support enablement of river crossings and stock crossings under rule NATC-R1 PER-1 as a permitted activity. However, this is not what the rule achieves. The definition of "crossings" is: "means in relation to vehicle access, the formed and properly constructed vehicle access from the carriage way of any road up to and including	Amend Rule NATC-R1 to expressly permit the construction of access for vehicles and/or stock across rivers.

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					<p>that portion of the road boundary of the site across which vehicle access is permitted by this plan and includes any culvert, bridge or kerbing". Consequently, NATC-R1 does not permit any "river" crossing not located between the carriageway of the road and the front boundary of a site.</p> <p>Also, given the definition of "crossing" only relates to vehicles, the references in this rule to "stock" and "culvert" also do not provide a meaningful assessment method.</p> <p>Therefore, it appears that most crossings (like culverts, fords and bridges) might fall to be assessed as discretionary activities, which would appear to be the reverse of the intent of NATC-R1.</p>	
<p><b>Top Energy Limited (S483)</b></p>	<p>S483.154</p>	<p>Natural character</p>	<p>NATC-R1</p>	<p>Not Stated</p>	<p>It is unclear why PER 1 is required where buildings or structures with ONL and ONF will be managed through the Natural features and landscape chapter.</p> <p>As noted throughout, electricity infrastructure is a critical component to ensuring a resilient, well-connected community. Top Energy seeks the following amendments in the right hand column to better provide for this within the margins of water bodies</p>	<p>Amend Rule NATC - R1 as follows:</p> <p>PER-1 <del>The building or structure, or extension or alteration to an existing building or structure on wetland, lake and river margins is not located within an ONL or ONF.</del></p> <p>PER-2</p> <p>The building or structure, or extension or alteration to an existing building or structure on wetland, lake and river margins is required for:</p> <p>1...</p> <p>4. a post and wire fence for the purpose of protection from farm stock, <b>or</b></p> <p>5. river crossings, including but not limited to, fords,</p>

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						<p>bridges, stock crossings and culvert crossings, <b>or</b></p> <p>6. activities related to the construction of river crossings, <b>or</b></p> <p>7. pumphouses utilised for the drawing of water provided they cover less than 25m<sup>2</sup> in area, <b>or</b></p> <p><b>8. maintenance, repair, operation or upgrading of network utilities where the works are permitted by the Infrastructure Chapter I-R3.</b></p>
<p><b>Northland Planning and Development 2020 Limited (S502)</b></p>	<p>S502.035</p>	<p>Natural character</p>	<p>NATC-R1</p>	<p>Support in part</p>	<p>For consistency with the exclusions applied to MHWS setbacks we seek to include exemptions for some structures which may have been unintendedly included.</p>	<p>Amend NATC-R1 PER-2 PER-2</p> <p>The building or structure, or extension or alteration to an existing building or structure on wetland, lake and river margins is required for:</p> <ol style="list-style-type: none"> <li>1. restoration and enhancement purposes; or</li> <li>2. natural hazard mitigation undertaken by, or on behalf of, the local authority; or</li> <li>3. park management activity in the Open Space or Sport and active recreation zone; or</li> <li>4. a post and wire fence for the purpose of protection from farm stock.</li> <li>5. river crossings, including but not limited to, fords, bridges, stock crossings and culvert crossings.</li> <li>6. activities related to the construction of river crossings.</li> </ol>



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						7. pumphouses utilised for the drawing of water provided they cover less than 25m2 in area. <b>8. Lighting poles by, or on behalf of, the local authority; or9. Footpaths and or paving no greater than 2m in width; or10. Boundary fences or walls no more than 2m in height above ground level;</b>
<b>Summit Forests New Zealand Limited (S148)</b>	S148.025	Natural character	NATC-R2	Not Stated	The rules fail to provide for all primary production activity	Amend NATC-R2 to replace "farming tracks" with "tracks for primary production"
<b>Horticulture New Zealand (S159)</b>	S159.058	Natural character	NATC-R2	Support in part	Include activities ancillary to horticulture	Amend Rule NATC-R2 by adding: <b>8. Irrigation infrastructure 9. Artificial crop protection structures</b>
<b>Manulife Forest Management (NZ) Ltd (S160)</b>	S160.020	Natural character	NATC-R2	Oppose	The submitter opposes NATC-R2 PER-1 as farming tracks is included but plantation forestry tracks is not included and this is not considered fair and equitable.	Amend NATC-R2 PER-1 to include plantation forestry tracks.
<b>Bentzen Farm Limited (S167)</b>	S167.027	Natural character	NATC-R2	Oppose	The provision is targeted only to effects on natural character and such potential effects can be properly anticipated when considering this activity class. As such the rule is more efficient and effective if restricted discretionary activity, rather than a full discretionary activity. The assessment matters set out in the relief sought are taken from policy NATC-P6, and provide a complete basis to assess likely and potential effects on natural character.	Amend rule NATC-R2 to change the activity status where compliance is not achieved with PER-1 from discretionary to <b>restricted discretionary</b> , with discretion limited to the effects on natural character values as follows: a. the presence or absence of

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>buildings, structures or infrastructure;</p> <p>b. the temporary or permanent nature of any adverse effects;</p> <p>c. the location, scale and design of any proposed development;</p> <p>d. any means of integrating the building, structure or activity;</p> <p>e. the ability of the environment to absorb change;</p> <p>f. the need for and location of earthworks or vegetation clearance;</p> <p>g. the operational or functional need of any regionally significant infrastructure to be sited in the particular location;</p> <p>h. any viable alternative locations for the activity or development;</p> <p>i. any historical, spiritual or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6;</p> <p>j. the likelihood of the activity exacerbating natural hazards;</p> <p>k. the opportunity to enhance</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>public access and recreation;                      l. the ability to improve the overall water quality; and                      m. any positive contribution the development has on the characteristics and qualities.</p>
<p><b>Matauri Trustee Limited (S243)</b></p>	<p>S243.041</p>	<p>Natural character</p>	<p>NATC-R2</p>	<p>Oppose</p>	<p>In the Proposed Plan, "Lake" has the same meaning as in section 2 of the RMA - "means a body of fresh water which is entirely or nearly surrounded by land".                      The Natural Character Chapter Rules, Objectives and Policies apply to lakes, without any limitation on the size of the lake.                      There are many small bodies of freshwater in the district which would qualify as a lake under this definition (including farm dams made by people), which do not contribute to natural character.                      The Operative District Plan applies the maximum setback rules to lakes only where the lakebed has an area of 8ha or more, with as lesser setback determined by a calculation against the area of the lake. The Operative Plan also defines a lake as "a permanent body of fresh water 5 or more hectares in area which is entirely or nearly surrounded by land".                      These alternative methods have not been assessed in the Section 32 report; however, both efficiently and effectively achieves the objective by targeting the rule to lakes most likely to exhibit natural character while minimising the costs of resource consent applications by not applying the full set back provisions to smaller lakes and dams                      Either option should be carried over into the Proposed Plan to ensure that the provisions relating to Wetland, Lake and River Margins in the Proposed Plan are targeted to larger lakes, which are more likely to</p>	<p>Amend reference to lake in rule NATC-R2 to exclude application to lakes with a bed less than 5ha in area and exclude a body of freshwater impounded by a dam.</p>

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					<p>contribute to natural character, and avoid the provisions apply to farm dams. See also the relief sought in this submission in relation to the Definition of "Wetland, Lake and River Margins" which would achieve the same outcome.</p>	
<p><b>Matauri Trustee Limited (S243)</b></p>	<p>S243.045</p>	<p>Natural character</p>	<p>NATC-R2</p>	<p>Oppose</p>	<p>The provision is targeted only to effects on natural character and such potential effects can be properly anticipated when considering this activity class. As such the rule is more efficient and effective if restricted discretionary activity, rather than a full discretionary activity. The assessment matters set out in the relief sought are taken from policy NATC-P6, and provide a complete basis to assess likely and potential effects on natural character.</p>	<p>Amend rule NATC-R2 to change the activity status where compliance is not achieved with PER-1 from discretionary to restricted discretionary, with discretion limited to the effects on natural character values as follows:<b>a. the presence or absence of buildings, structures or infrastructure;b. the temporary or permanent nature of any adverse effects;c. the location, scale and design of any proposed development;d. any means of integrating the building, structure or activity;e. the ability of the environment to absorb change;f. the need for and location of earthworks or vegetation clearance;g. the operational or functional need of any regionally significant infrastructure to be sited in the particular location;h. any viable alternative locations for the activity or development;i. any historical, spiritual or cultural</b></p>

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						<b>association held by tangata whenua, with regard to the matters set out in Policy TW-P6;j. the likelihood of the activity exacerbating natural hazards;k. the opportunity to enhance public access and recreation;l. the ability to improve the overall water quality; andm. any positive contribution the development has on the characteristics and qualities.</b>
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.091	Natural character	NATC-R2	Support	The Director-General is generally supportive of the entire Natural Character chapter for giving effect to the NPS-FM.	Retain entire chapter as notified
<b>KiwiRail Holdings Limited (S416)</b>	S416.034	Natural character	NATC-R2	Support	Repair and maintenance within wetland, lake and river margins is supported to ensure network utilities perform effectively.	Retain Rule NATC-R2
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.148	Natural character	NATC-R2	Support in part	Federated Farmers generally supports rules NATC-R1, NATC-R2 and NATC-R3 as set out in the district plan. It is considered that there is a need for the rules to provide for activities with a functional need to be located within a natural character area so long as the subdivision, use or development is not inappropriate for the area.	Amend Rule NATC-R2 to provide for activities that need to be located within a natural character area as long as the subdivision, use and development is not inappropriate for the area
<b>Northland Fish and Game Council (S436)</b>	S436.036	Natural character	NATC-R2	Not Stated	For the reasons set out under 'general submissions 'Maimai' of the submission (refer to submission points S436.003 to S436.006)" NFGC seek amendments to Rule NATC-R2 to include maimai.	Insert new point in Rule NATC-R2 as follows: <b>8. maimai.</b>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Kapiro Conservation Trust (S442)</b>	S442.094	Natural character	NATC-R2	Support in part	This rule is referred to by NATC-R3.	Amend, if NATC-R3 is not amended then will require amendment to this rule to give effect to relief sought for NATC-R3 Per-1(1).
<b>Top Energy Limited (S483)</b>	S483.155	Natural character	NATC-R2	Support	Top Energy support the enablement of repair and maintenance of network utilities within the margins of waterbodies	Retain Rule NATC-R2
<b>Northland Planning and Development 2020 Limited (S502)</b>	S502.036	Natural character	NATC-R2	Support in part	We seek additional features be added as they are similar in nature to others described within the list. These features are common within wetland, lake and river margins and require ongoing repair and maintenance to ensure there are no adverse impacts on the surrounding environment and that they remain in good condition. It is considered unnecessary for additional consent to be required for repair and maintenance of such features, if the size, scale and materials used are like for like.	Amend NATC-R2 PER-1 The repair or maintenance within wetland, lake and river margins of the following activities where they have been lawfully established and where the size, scale and materials used are like for like: 1. roads. 2. fences. 3. network utilities. 4. driveways and access. 5. walking tracks. 6. cycling tracks. 7. farming tracks <b>8. Carparking areas</b> <b>9. Board walks</b> <b>10. Boat ramps</b> <b>11. Buildings or structures</b>
<b>Waitangi Limited (S503)</b>	S503.044	Natural character	NATC-R2	Not Stated	We are unsure whether it is the intent of the plan to cover just historic features or whether this rule seeks to extend wider to other elements which may not be historic. Regardless of this fact we seek that the following features also be added as they are similar in nature to others described within the list. These features are common within wetland, lake and river margins and require ongoing repair and maintenance to ensure there are no adverse impacts on the surrounding environment and that they remain in good condition. It is considered unnecessary for	Amend Rule NATC-R2 to insert four additional matters, as follows:  <ul style="list-style-type: none"> <li>• <b>Carparking areas</b></li> <li>• <b>Board walks</b></li> <li>• <b>Boat ramps</b></li> <li>• <b>Buildings or structures</b></li> </ul>

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					<p>additional consent to be required for repair and maintenance of such features, if the size, scale and materials used are like for like.</p> <p>The same is considered to apply for buildings and structures. The Operative Plan provided for renovation and maintenance of buildings as a permitted activity, with no requirement for scale, size and materials being like for like. It is considered that with the additional control of requiring scale, size and materials to be like for like, this will ensure that any repair and maintenance on buildings and/or structures does not change how the natural character of the coastal environment is perceived. Once again, repair and maintenance of lawfully established buildings and structures is required on an on-going basis to ensure that the wetland, lake and river margins is preserved and enhanced.</p>	
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.075	Natural character	NATC-R2	Support in part	This rule is referred to by NATC-R3	Amend if NATC-R3 is not amended to give effect to relief sought for NATC-R3 Per-1(1)
<b>Summit Forests New Zealand Limited (S148)</b>	S148.026	Natural character	NATC-R3	Not Stated	The rules fail to provide for earthworks necessary water and sediment controls associated with existing roads, tracks, and accessways.	Amend NATC-R3 to provide for earthworks necessary to install, maintain, or upgrade water and sediment control within a wetland, lake, or river margin associated with existing roads, tracks, and accessways.
<b>Horticulture New Zealand (S159)</b>	S159.059	Natural character	NATC-R3	Support	Clearance and earthworks for biosecurity purposes is supported.	Retain Rule NATC-R3
<b>Bentzen Farm Limited (S167)</b>	S167.028	Natural character	NATC-R3	Oppose	The provision is targeted only to effects on natural character and such potential effects can be properly anticipated when considering this activity class. As such the rule is more efficient and effective if restricted discretionary activity, rather than a full discretionary activity. The assessment matters set out in the relief sought	Amend rule NATC-R3 to change the activity status where compliance is not achieved with PER-1 and PER-1 from discretionary/non-complying to <b>restricted discretionary</b> , with discretion limited to the

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					<p>are taken from policy NATC-P6, and provide a complete basis to assess likely and potential effects on natural character.</p>	<p>effects on natural character values as follows:</p> <ul style="list-style-type: none"> <li>a. the presence or absence of buildings, structures or infrastructure;</li> <li>b. the temporary or permanent nature of any adverse effects;</li> <li>c. the location, scale and design of any proposed development;</li> <li>d. any means of integrating the building, structure or activity;</li> <li>e. the ability of the environment to absorb change;</li> <li>f. the need for and location of earthworks or vegetation clearance;</li> <li>g. the operational or functional need of any regionally significant infrastructure to be sited in the particular location;</li> <li>h. any viable alternative locations for the activity or development;</li> <li>i. any historical, spiritual or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6;</li> </ul>



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						<p>j. the likelihood of the activity exacerbating natural hazards;                      k. the opportunity to enhance public access and recreation;                      l. the ability to improve the overall water quality; and                      m. any positive contribution the development has on the characteristics and qualities.</p>
<p><b>Matauri Trustee Limited (S243)</b></p>	<p>S243.042</p>	<p>Natural character</p>	<p>NATC-R3</p>	<p>Oppose</p>	<p>In the Proposed Plan, "Lake" has the same meaning as in section 2 of the RMA - "means a body of fresh water which is entirely or nearly surrounded by land".                      The Natural Character Chapter Rules, Objectives and Policies apply to lakes, without any limitation on the size of the lake.                      There are many small bodies of freshwater in the district which would qualify as a lake under this definition (including farm dams made by people), which do not contribute to natural character.                      The Operative District Plan applies the maximum setback rules to lakes only where the lakebed has an area of 8ha or more, with as lesser setback determined by a calculation against the area of the lake. The Operative Plan also defines a lake as "a permanent body of fresh water 5 or more hectares in area which is entirely or nearly surrounded by land".                      These alternative methods have not been assessed in the Section 32 report; however, both efficiently and effectively achieves the objective by targeting the rule to lakes most likely to exhibit natural character while minimising the costs of resource consent applications by not applying the full set back provisions to smaller lakes and dams                      Either option should be carried over into the</p>	<p>Amend reference to lake in rule NATC-R3 to exclude application to lakes with a bed less than 5ha in area and exclude a body of freshwater impounded by a dam.</p>

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					<p>Proposed Plan to ensure that the provisions relating to Wetland, Lake and River Margins in the Proposed Plan are targeted to larger lakes, which are more likely to contribute to natural character, and avoid the provisions apply to farm dams. See also the relief sought in this submission in relation to the Definition of "Wetland, Lake and River Margins" which would achieve the same outcome.</p>	
<p><b>Matauri Trustee Limited (S243)</b></p>	<p>S243.046</p>	<p>Natural character</p>	<p>NATC-R3</p>	<p>Oppose</p>	<p>The provision is targeted only to effects on natural character and such potential effects can be properly anticipated when considering this activity class. As such the rule is more efficient and effective if restricted discretionary activity, rather than a full discretionary activity. The assessment matters set out in the relief sought are taken from policy NATC-P6, and provide a complete basis to assess likely and potential effects on natural character.</p>	<p>Amend rule NATC-R3 to change the activity status where compliance is not achieved with PER-1 and PER-2 (inferred) from discretionary/non-complying to restricted discretionary, with discretion limited to the effects on natural character values as follows:<b>a. the presence or absence of buildings, structures or infrastructure;b. the temporary or permanent nature of any adverse effects;c. the location, scale and design of any proposed development;d. any means of integrating the building, structure or activity;e. the ability of the environment to absorb change;f. the need for and location of earthworks or vegetation clearance;g. the operational or functional need of any regionally significant infrastructure to be sited in the particular</b></p>

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						location;h. any viable alternative locations for the activity or development;i. any historical, spiritual or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6;j. the likelihood of the activity exacerbating natural hazards;k. the opportunity to enhance public access and recreation;l. the ability to improve the overall water quality; andm. any positive contribution the development has on the characteristics and qualities.
Director-General of Conservation (Department of Conservation ) (S364)	S364.092	Natural character	NATC-R3	Support	The Director-General is generally supportive of the entire Natural Character chapter for giving effect to the NPS-FM.	Retain entire chapter as notified
Northland Federated Farmers of New Zealand (S421)	S421.149	Natural character	NATC-R3	Support in part	Federated Farmers generally supports rules NATC-R1, NATC-R2 and NATC-R3 as set out in the district plan. It is considered that there is a need for the rules to provide for activities with a functional need to be located within a natural character area so long as the subdivision, use or development is not inappropriate for the area.	Amend Rule NATC-R3 to provide for activities that need to be located within a natural character area as long as the subdivision, use and development is not inappropriate for the area
Northland Fish and Game Council (S436)	S436.037	Natural character	NATC-R3	Not Stated	For the reasons set out under 'general submissions 'wetlands"' of the submission (refer to submission points S436.001 and S436.002), amend Rule NATC-R3 to include wetland maintenance and restoration work.	Insert a new point in PER-1 of Rule NATC-R3 as follows: <b>6. Wetland maintenance and restoration work</b>

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<b>Kapiro Conservation Trust (S442)</b>	S442.095	Natural character	NATC-R3	Oppose	It is not clear if this rule conflicts with the NES-FW. Sub-policy Per-1(1) is to loose, same relief as requested for IB-R1(13) Sub-policy Per-1(4) is also to loose. Request same relief as for IB-R1(4).	Amend NATC- R3, if required to so as not to be more lenient than the NES-FW Amend sub-policy 1 the same as requested for IB-R1(13) Amend sub-policy 4 the same as requested for IB-R1(4).
<b>Top Energy Limited (S483)</b>	S483.156	Natural character	NATC-R3	Not Stated	Top Energy supports NATC-R3, in particular PER 1 (1) and (2) but seeks that it be amended to provide for works associated with upgrading as sought through the inclusion of a new rule	Amend PER 1 of Rule NATC-R3 as follows (or to the same effect): PER-1 The earthworks or indigenous vegetation clearance within wetland, lake and river margins is: 1.required for the repair or maintenance permitted under NATC-R2; or 2.required to provide for safe and reasonable clearance for existing overhead power lines; <b>or</b> 3.necessary to address a risk to public health and safety; <b>or</b> 4.for biosecurity reasons; <b>or</b> 5.for the sustainable non-commercial harvest of plant material for rongoā Māori; <b>or</b> 6. <b>Required for the upgrade of network utilities where the works are permitted by the NATC-R1</b>
<b>Royal Forest and Bird Protection Society of</b>	S511.076	Natural character	NATC-R3	Oppose	It is not clear if this rule conflicts with the NES-FW. Sub-policy Per-1(1) is to loose, same relief as requested for IB-R1(13) Sub-policy Per-1(4)	Amend NATC- R3 if required to so as not to be more lenient than the NES-FW Amend sub-policy 1 the same as

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<b>New Zealand (S511)</b>					is also to loose. Request same relief as for IB-R1(4)	requested for IB-R1(13) Amend sub-policy 4 the same as requested for IB-R1(4)
<b>Fire and Emergency New Zealand (S512)</b>	S512.027	Natural character	NATC-R3	Support in part	Fire and Emergency may be required to remove vegetation in the event of an emergency or to reduce fire risk. This is enabled under Section 65 and 68 of the Fire and Emergency New Zealand Act 2017. The exact quantities of vegetation disturbance required cannot be determined in advance, and will be unique to the risk or emergency response required. Fire and Emergency considers that the reference to managing fire risk and so recommends similar language as in IB-R1 so that the plan aligns with the actions required by Fire and Emergency personnel under the Fire and Emergency New Zealand Act 2017.	Amend NATC-R3 1. required for the repair or maintenance permitted under NATC-R2; or 2. required to provide for safe and reasonable clearance for existing overhead power lines. 3. necessary to address a risk to public health and safety <b>or damage to property.</b> <b>4. To create and/or maintain firebreaks to manage fire risk</b> 5. for biosecurity reasons. 6. for the sustainable non-commercial harvest of plant material for rongoā Māori.
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527)</b>	S527.016	Natural character	NATC-R3	Oppose	The PDP provisions will not preserve the natural character of waterways and wetlands. NATC-R3 allows an excessive amount of earthworks and indigenous vegetation clearance up to 400m2 within the margins of wetlands, lakes and rivers. This provision does not align with RMA s6 nor with NPS-Freshwater provisions. The PDP defines the margins of wetlands, lakes and rivers as 20 - 30m, depending on the zone. The definition should be based on 30m, especially in the industrial and residential zones where greater protection is needed.	Amend to reduce the amount of earthworks and vegetation clearance (inferred)
<b>Carbon Neutral NZ Trust (S529)</b>	S529.140	Natural character	NATC-R3	Support in part	NATC-R3 PER-2 & NATC-S2 allow an excessive amount of earthworks and indigenous vegetation clearance up to 400m2 within the margins of wetlands, lakes and rivers. This provision does not align with RMA s6 nor with NPS-Freshwater provisions.	Amend NATC-R3 to align with the RMA s6 and NPS freshwater provisions

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<b>Russell Protection Society (INC) (S179)</b>	S179.075	Natural character	Standards	Support	In view of the fact that coastal zones are not provided for in the Proposed district plan, then the Coastal Environment, Natural Character and Natural Features and Landscape Overlays become very important in helping to define the boundaries of Russell and in safeguarding a suitable backdrop or canvass which to interpret and appreciate the historic township. It is especially important that these overlays provide adequate protection to the headlands framing Russell and the natural coastal escarpments that characterize the balance of the Russell Peninsula. For this reason it is important to control subdivision and development of coastal lands in the area.	Retain standards
<b>Carbon Neutral NZ Trust (S529)</b>	S529.236	Natural character	Standards	Not Stated	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. 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.	Amend the PDP to give full effect to the NPS - Freshwater Management 2020

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					<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 (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>Lynley Newport (S136)</b>	S136.002	Natural character	NATC-S1	Oppose	<p>There is no resource management based link between the height of a building or structure and its proximity to a wetland, lake or river margin. Setback distance and size of the building or structure maybe, but not height.</p> <p>If the wetland, lake or river margin is within an</p>	Delete NATC-S1.

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					area identified as Outstanding Natural Feature or Outstanding Natural Landscape, then potentially the height may have an effect. There is no need for, or justification for NATC-S1.	
<b>Paul Hayman (S210)</b>	S210.003	Natural character	NATC-S1	Oppose	Rule 1 of this standard is overly restrictive and the maximum height of the zone the property is in should be the governing factor.	Amend the standard to read: The maximum height of a building or structure, or extension or alteration to an existing building or structure <del>is 5m above ground level</del> <b>should not be higher than the zone rule of the site.</b>
<b>Ministry of Education Te Tāhuhu o Te Mātauranga (S331)</b>	S331.048	Natural character	NATC-S1	Support	The submitter supports NATC-S1 Maximum height and acknowledges this standard to manage the maximum height of a building or structure that is lawfully established (which can include educational facilities), located on wetland, lake and river margins.	Retain NATC-S1 Maximum height, as proposed.
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.093	Natural character	NATC-S1	Support	The Director-General is generally supportive of the entire Natural Character chapter for giving effect to the NPS-FM.	Retain entire chapter as notified
<b>Bentzen Farm Limited (S167)</b>	S167.029	Natural character	NATC-S2	Oppose	The limitation on earthworks for 400m <sup>2</sup> for 10 years from the notification of the Proposed Plan is unduly restrictive and does not recognise that the effects of earthworks (complying with the other standards proposed in the rule) can effectively 'heal' over a calendar year through re-grassing, establishment of vegetation or the construction of the building or accessway for which the earthworks were required. To impose area limitations for the 10-year time frame will trigger resource consent applications for subsequent earthworks which need only be assessed against this new established environment, rather than against earthworks occurring some time over the preceding 10 year period.	Amend NATC-S2 as follows: Any earthworks or indigenous vegetation on a site within wetland, lake <b>(where the lake bed has an area of 5ha or more or is a body of freshwater impounded by a dam)</b> and river margins clearance must: 1. not exceed a total area of 400m <sup>2</sup> <del>for 10 years from the notification of the District Plan</del> <b>per calendar year</b> , unless a



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					<p>Clause 3 of the rule implies visual screening, and that being the case, it should state where screening is to be from. This should be a public place given that is where natural character values will be seen from.</p> <p>The Standard references 'control in 5 below', however there is no number 5 in the standard.</p>	<p>control in 5. below applies;</p> <p>2. not exceed a cut height or fill depth of 1m;</p> <p>3. screen exposed faces <b>visible from a public place</b>; and</p> <p>4. comply with Ecosystems and indigenous biodiversity chapter, NFL-S3 Earthworks or indigenous vegetation clearance and CE-S3 Earthworks or indigenous vegetation clearance.</p> <p>Note: The NESF requires a 10m setback from any natural wetland in respect of earthworks or vegetation clearance and may require consent from the Regional Council.</p> <p>Insert the following as '5'.<b>Earthworks</b>i. <b>must for their duration be controlled in accordance with the Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Auckland Region 2016 (Auckland Council Guideline Document GD2016/005)</b>;ii. <b>shall be implemented to prevent silt or sediment from entering water bodies, coastal marine area, any</b></p>

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						<b>stormwater system, overland flow paths, or roads.</b>
<b>Matauri Trustee Limited (S243)</b>	S243.043	Natural character	NATC-S2	Oppose	<p>In the Proposed Plan, "Lake" has the same meaning as in section 2 of the RMA - "means a body of fresh water which is entirely or nearly surrounded by land".</p> <p>The Natural Character Chapter Rules, Objectives and Policies apply to lakes, without any limitation on the size of the lake.</p> <p>There are many small bodies of freshwater in the district which would qualify as a lake under this definition (including farm dams made by people), which do not contribute to natural character.</p> <p>The Operative District Plan applies the maximum setback rules to lakes only where the lakebed has an area of 8ha or more, with as lesser setback determined by a calculation against the area of the lake. The Operative Plan also defines a lake as "a permanent body of fresh water 5 or more hectares in area which is entirely or nearly surrounded by land".</p> <p>These alternative methods have not been assessed in the Section 32 report; however, both efficiently and effectively achieves the objective by targeting the rule to lakes most likely to exhibit natural character while minimising the costs of resource consent applications by not applying the full set back provisions to smaller lakes and dams</p> <p>Either option should be carried over into the Proposed Plan to ensure that the provisions relating to Wetland, Lake and River Margins in the Proposed Plan are targeted to larger lakes, which are more likely to contribute to natural character, and avoid the provisions apply to farm dams.</p> <p>See also the relief sought in this submission in relation to the Definition of "Wetland, Lake and</p>	Amend reference to lake in standard NATC-S2 to exclude application to lakes with a bed less than 5ha in area and exclude a body of freshwater impounded by a dam.

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<p><b>Matauri Trustee Limited (S243)</b></p>	<p>S243.047</p>	<p>Natural character</p>	<p>NATC-S2</p>	<p>Oppose</p>	<p>River Margins" which would achieve the same outcome.</p> <p>Amendments to size of the lake or being a dam as per previous submission points. The limitation on earthworks for 400m<sup>2</sup> for 10 years from the notification of the Proposed Plan is unduly restrictive and does not recognise that the effects of earthworks (complying with the other standards proposed in the rule) can effectively 'heal' over a calendar year through re-grassing, establishment of vegetation or the construction of the building or accessway for which the earthworks were required. To impose area limitations for the 10-year time frame will trigger resource consent applications for subsequent earthworks which need only be assessed against this new established environment, rather than against earthworks occurring some time over the preceding 10 year period. Clause 3 of the rule implies visual screening, and that being the case, it should state where screening is to be from. This should be a public place given that is where natural character values will be seen from. The Standard references 'control in 5 below', however there is no number 5 in the standard. On the basis that this was intended to reference sediment control methods as follows (taken from EW-S5 Erosion and sediment control), then this is an appropriate addition to the rule as an effective method to control : Earthworks i. must for their duration be controlled in accordance with the Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Auckland Region 2016 (Auckland Council Guideline Document GD2016/005); ii. shall be implemented to prevent silt or sediment from entering water bodies, coastal marine area, any stormwater system, overland flow paths, or roads.</p>	<p>Amend standard NATC-S2 as follows: Any earthworks or indigenous vegetation on a site within wetland, lake <b>(where the lake bed has an area of 5ha or more or is a body of freshwater impounded by a dam)</b> and river margins clearance must: 1. not exceed a total area of 400m<sup>2</sup> for 10 years from the notification of the District Plan <b>per calendar year</b>, unless a control in 5. below applies; 2. not exceed a cut height or fill depth of 1m; 3. screen exposed faces <b>visible from a public place</b>; and 4. comply with Ecosystems and indigenous biodiversity chapter, NFL-S3 Earthworks or indigenous vegetation clearance and CE-S3 Earthworks or indigenous vegetation clearance. Note: The NESF requires a 10m setback from any natural wetland in respect of earthworks or vegetation clearance and may require consent from the Regional</p>

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						<p>Council.            Add the following as '5'.<b>Earthworks. must for their duration be controlled in accordance with the Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Auckland Region 2016 (Auckland Council Guideline Document GD2016/005);ii. shall be implemented to prevent silt or sediment from entering water bodies, coastal marine area, any stormwater system, overland flow paths, or roads.</b></p>
<p><b>Director-General of Conservation (Department of Conservation ) (S364)</b></p>	S364.094	Natural character	NATC-S2	Support	<p>The Director-General is generally supportive of the entire Natural Character chapter for giving effect to the NPS-FM.</p>	<p>Retain entire chapter as notified</p>
<p><b>Far North District Council (S368)</b></p>	S368.007	Natural character	NATC-S2	Support in part	<p>Technical error. Incorrect reference to one of the points within Standard NATC-S2. NATC-S2 point 1. should reference point 4. not point 5.</p>	<p>Amend NATC-S2 Earthworks or indigenous vegetation clearance            Any earthworks or indigenous vegetation on a site within wetland, lake and river margins clearance must:            1 . not exceed a total area of 400m2 for 10 years from the notification of the District Plan, unless a control in <del>5</del>.<b>4</b> below</p>

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						<p>applies;</p> <p>2. not exceed a cut height or fill depth of 1 m;</p> <p>3. screen exposed faces; and</p> <p>4. comply with Ecosystems and indigenous biodiversity chapter, NFL-S3 Earthworks or indigenous vegetation clearance and</p>
<p><b>Te Hiku Iwi Development Trust (S399)</b></p>	<p>S399.065</p>	<p>Natural character</p>	<p>NATC-S2</p>	<p>Not Stated</p>	<p>As worded, NATC-S2 appears to be inconsistent with The National Policy Statement for Freshwater Management (2020) and accompanying National Environmental Standards.</p> <p>The accompanying note, that the NESF requires a 10m setback from any natural wetland and may require consent is noted, but since this comes after the standard, this could easily be confused.</p> <p>The NPS and NES make earthworks within 100m of a wetland a non-complying activity if it will result or is likely to result in drainage or partial drainage of the wetland (Rule 52) and earthworks within a wetland a prohibited activity if it will result or is likely to result in partial drainage of the wetland (Rule 53).</p> <p>Vegetation clearance within, or within a 10 m setback from, a wetland and earthworks within, or within a 10 m setback from, a wetland are non-complying activities under Rule 54.</p> <p>This matter can be addressed by amending the wording at the start of NATC-S2 so that it is clear that earthworks and clearance within a wetland are generally prohibited/non-complying.</p>	<p>Amend Standard NATC-S2 so that it clearly states that any clearance of vegetation must be outside a 10m margin from wetlands.</p>
<p><b>Northland Fish and Game</b></p>	<p>S436.038</p>	<p>Natural character</p>	<p>NATC-S2</p>	<p>Not Stated</p>	<p>For the reasons set out under 'general submissions 'wetlands'' of the submission (refer to submission points S436.001 and S436.002),</p>	<p>Amend standard NATC-S2 as follows: Any earthworks or indigenous</p>

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<b>Council (S436)</b>					amend Standard NATC-S2 to bring the conditions in line with the NESF.	<p>vegetation on a site within wetland, lake and river margins clearance must:</p> <ol style="list-style-type: none"> <li>1. not exceed a total area of <b>4500m<sup>2</sup> or 10% of the area of the natural wetland for 10 years from the notification of the District Plan, unless a control in 5. below applies;</b></li> <li>2. ...</li> <li>3. ...</li> <li>4. ...</li> </ol> <p><del>Note: The NESF requires a 10m setback from any natural wetland in respect of earthworks or vegetation clearance and may require consent from the Regional Council.</del></p>
<b>Kapiro Conservation Trust (S442)</b>	S442.096	Natural character	NATC-S2	Support in part	NATC-(1) should refer to (4). This standards also points out the clear need for the indigenous biodiversity to apply to this chapter as well because this standard is far more lenient than IB-R3.	Amend NATC-S2: " ... <del>5</del> 4 ..."
<b>Northland Planning and Development 2020 Limited (S502)</b>	S502.037	Natural character	NATC-S2	Support in part	We believe the reference to point number 5 is a typo and should be point 4. The note regarding the NESF is misleading. Generally speaking any activity, you undertake within 100m of a wetland area will trigger consent as most activities will divert water in some way. Amended wording has been offered for consideration.	Amend NATC-S2 Any earthworks or indigenous vegetation on a site within wetland, lake and river margins clearance must: 1. not exceed a total area of 400m <sup>2</sup> for 10 years from the notification of the District Plan, unless a control in <del>5.4</del> below

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						<p>applies;</p> <p>2. not exceed a cut height or fill depth of 1m;</p> <p>3. screen exposed faces; and</p> <p>4. comply with Ecosystems and indigenous biodiversity chapter, NFL-S3 Earthworks or indigenous vegetation clearance and CE-S3 Earthworks or indigenous vegetation clearance. <del>Note: The NESF requires a 10m setback from any natural wetland in respect of earthworks or vegetation clearance and may require consent from the Regional Council. Attention is also drawn to the NESF which has additional requirements around works within 100m of a wetland area.</del></p>
<p><b>Waitangi Limited (S503)</b></p>	<p>S503.045</p>	<p>Natural character</p>	<p>NATC-S2</p>	<p>Not Stated</p>	<p>We believe the reference to point number 5 is a typo and should be point 4. The note regarding the NESF is misleading. Generally speaking any activity you undertake within 100m of a wetland area will trigger consent as most activities will divert water in some way. Amended wording has been offered for consideration.</p>	<p>Amend point 2 of Standard NATC-S2 as follows: not exceed a total area of 400m<sup>2</sup> for 10 years from the notification of the District Plan, unless a control in 54.4 below applies</p> <p>Amend the note to Standard NATC-S2 as follows:<del>The NESF requires a 10m setback from</del></p>

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						any natural wetland in respect of earthworks or vegetation clearance and may require consent from the Regional Council. <b>Attention is also drawn to the NESF which has additional requirements around works within 100m of a wetland area.</b>
Royal Forest and Bird Protection Society of New Zealand (S511)	S511.077	Natural character	NATC-S2	Support in part	NATC-(1) should refer to (4). This standards also points out the clear need for the indigenous biodiversity to apply to this chapter as well because this standard is far more lenient than IB-R3	Amend NATC-S2 " ...5 4 ..."
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527)	S527.017	Natural character	NATC-S2	Oppose	The PDP provisions will not preserve the natural character of waterways and wetlands. NATC-R3 allows an excessive amount of earthworks and indigenous vegetation clearance up to 400m2 within the margins of wetlands, lakes and rivers. This provision does not align with RMA s6 nor with NPS-Freshwater provisions. The PDP defines the margins of wetlands, lakes and rivers as 20 - 30m, depending on the zone. The definition should be based on 30m, especially in the industrial and residential zones where greater protection is needed.	Amend to reduce the amount of earthworks and vegetation clearance (inferred)
Carbon Neutral NZ Trust (S529)	S529.141	Natural character	NATC-S2	Support in part	NATC-R3 PER-2 & NATC-S2 allow an excessive amount of earthworks and indigenous vegetation clearance up to 400m2 within the margins of wetlands, lakes and rivers. This provision does not align with RMA s6 nor with NPS-Freshwater provisions.	Amend NATC-S2 to align with RMA s6 or with NPS-Freshwater provisions.
Carbon Neutral NZ Trust (S529)	S529.143	Natural character	NATC-S2	Support in part	A note under NATS-S2 states: 'Note: The NESF requires a 10m setback from any natural wetland in respect of earthworks or vegetation clearance and may require consent from the Regional	Amend NATC-S2 note to refer to the NES-F provisions which covers some activities within 100m of a natural wetland that



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					Council.' However, this statement is incomplete and therefore misleading - it refers only to a 10m setback distance, when in fact the NES-F provisions also cover some activities within 100m of a natural wetland that require consent from the regional council. The Note should be amended to provide the correct information.	require consent from the regional council.
<b>Bentzen Farm Limited (S167)</b>	S167.030	Natural features and landscapes	Overview	Oppose	The Overview incorrectly identifies that modification of ONLs has been minimal. Large tracts of ONLs are highly modified from their natural state by land uses including historical settlement, burn-offs, logging, forestry and farming practices. In many instances the characteristics of the ONL are in fact defined by these previous or current land uses. The Overview as written sets up an incorrect expectation that ONLs as mapped are in a natural state. The objective is also internally inconsistent with policy NFL-P4 which correctly recognises that farming is part of ONLs.	Amend the Overview as follows: The Far North District has an extensive coastline with many harbours, large tracts of indigenous vegetation and a wide variety of natural processes that operate at varying scales. This has created a District rich in unique landscapes and features. In many instances, they are celebrated by cultural associations and stories. <del>Modification of these places has been minimal largely due to their remote locations, historic heritage and in some cases challenging topography and geomorphology.</del>
<b>Setar Thirty Six Limited (S168)</b>	S168.033	Natural features and landscapes	Overview	Oppose	Outstanding natural landscapes (ONL) account for approximately 22% of the Far North District's land area. Of this, a significant portion has been highly modified in the past.  The Overview incorrectly identifies that modification of ONLs has been minimal. Large tracts of ONLs are highly modified from their natural state by land uses including historical settlement, burn-offs, logging, forestry and farming practices. In many instances the characteristics of the ONL are in fact defined by these previous or current land uses. The Overview as written sets up an incorrect	Amend the Overview as follows: The Far North District has an extensive coastline with many harbours, large tracts of indigenous vegetation and a wide variety of natural processes that operate at varying scales. This has created a District rich in unique landscapes and features. In many instances, they are celebrated by cultural associations and stories. <del>Modification of these places has been minimal</del>

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					expectation that ONLs as mapped are in a natural state. The objective is also internally inconsistent with policy NFL-P4 which correctly recognises that farming is part of ONLs.	<del>largely due to their remote locations, historic heritage and in some cases challenging topography and geomorphology.</del>
<b>MLP LLC (S183)</b>	S183.006	Natural features and landscapes	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Landing Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Landing Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Landing Scheme as well as the continuation of farming activities.
<b>The Shooting Box Limited (S187)</b>	S187.026	Natural features and landscapes	Overview	Oppose	Outstanding natural landscapes (ONL) account for approximately 22% of the Far North District's land area. Of this, a significant portion has been highly modified in the past.	Amend the Overview as follows: The Far North District has an extensive coastline with many harbours, large tracts of indigenous vegetation and a wide variety of natural processes that operate at varying scales. This has created a District rich in unique landscapes and features. In many instances, they are celebrated by cultural associations and stories. <del>Modification of these places has been minimal largely due to their remote locations, historic heritage and in some cases challenging topography and geomorphology.</del>

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<b>Wendover Two Limited (S222)</b>	S222.033	Natural features and landscapes	Overview	Support in part	<p>Outstanding natural landscapes (ONL) account for approximately 22% of the Far North District's land area. Of this, a significant portion has been highly modified in the past.</p> <p>The Overview incorrectly identifies that modification of ONLs has been minimal. Large tracts of ONLs are highly modified from their natural state by land uses including historical settlement, burn-offs, logging, forestry and farming practices. In many instances the characteristics of the ONL are in fact defined by these previous or current land uses. The Overview as written sets up an incorrect expectation that ONLs as mapped are in a natural state. The objective is also internally inconsistent with policy NFL-P4 which correctly recognises that farming is part of ONLs.</p>	<p>Amend the Overview as follows: The Far North District has an extensive coastline with many harbours, large tracts of indigenous vegetation and a wide variety of natural processes that operate at varying scales. This has created a District rich in unique landscapes and features. In many instances, they are celebrated by cultural associations and stories. <del>Modification of these places has been minimal largely due to their remote locations, historic heritage and in some cases challenging topography and geomorphology.</del></p>
<b>Tryphena Trustees Limited, David Haythornwait e (S226)</b>	S226.006	Natural features and landscapes	Overview	Oppose	<p>The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).</p>	<p>Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.</p>
<b>Isles Casey Trustee Services Limited, WWC Trustee Company Limited (S227)</b>	S227.006	Natural features and landscapes	Overview	Oppose	<p>The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).</p>	<p>Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well</p>

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						as the continuation of farming activities.
<b>Jayesh Govind and Others (S228)</b>	S228.006	Natural features and landscapes	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Laurie Pearson (S229)</b>	S229.006	Natural features and landscapes	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Mataka Residents' Association Inc (S230)</b>	S230.006	Natural features and landscapes	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Ovisnegra Limited (S231)</b>	S231.006	Natural features and landscapes	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources	Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides

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					and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Tobias Groser (S232)</b>	S232.006	Natural features and landscapes	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Whale Bay Limited (S233)</b>	S233.006	Natural features and landscapes	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Whale Bay Limited (S234)</b>	S234.006	Natural features and landscapes	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>WW Trustee Services 2016 Limited, Eloise</b>	S235.006	Natural features and landscapes	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's	Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct

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<b>Caroline Caswell, Donald Gordon Chandler (S235)</b>					functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Connemara Black Limited (S236)</b>	S236.006	Natural features and landscapes	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Evan Williams and Katherine Williams (S237)</b>	S237.006	Natural features and landscapes	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>John Gowing and Miriam Van Lith (S238)</b>	S238.006	Natural features and landscapes	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>John Gowing, Miriam Van Lith, Ellis Gowing, James Gowing, Byron Gowing (S239)</b>	S239.006	Natural features and landscapes	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Matthew Watson, Kaylene Watson, D R Thomas Limited (S240)</b>	S240.006	Natural features and landscapes	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Matthew Draper and Michaela Jannard (S241)</b>	S241.006	Natural features and landscapes	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Matauri Trustee Limited (S243)</b>	S243.048	Natural features and landscapes	Overview	Oppose	Outstanding natural landscapes (ONL) account for approximately 22% of the Far North District's land area. Of this, a significant portion has been highly modified in the past. The Overview incorrectly identifies that modification of ONLs has been minimal. Large tracts of ONLs are highly modified from their natural state by land uses including historical settlement, burn-offs, logging, forestry and	Amend the Overview as follows: The Far North District has an extensive coastline with many harbours, large tracts of indigenous vegetation and a wide variety of natural processes that operate at varying scales. This has created a District rich in unique landscapes and features.

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					<p>farming practices. In many Instances the characteristics of the ONL are in fact defined by these previous or current land uses. The Overview as written sets up an incorrect expectation that ONLs as mapped are in a natural state.</p> <p>The objective is also internally Inconsistent with policy NFL-P4 which correctly Recognises that farming is part of ONLs.</p>	<p>In many instances, they are celebrated by cultural associations and stories. <del>Modification of these places has been minimal largely due to their remote locations, historic heritage and in some cases challenging topography and geomorphology.</del></p>
<b>P S Yates Family Trust (S333)</b>	S333.025	Natural features and landscapes	Overview	Support in part	<p>Outstanding natural landscapes (ONL) account for approximately 22% of the Far North District's land area. Of this, a significant portion has been highly modified in the past. The Overview incorrectly identifies that modification of ONLs has been minimal. Large tracts of ONLs are highly modified from their natural state by land uses including historical settlement, burn-offs, logging, forestry and farming practices. In many instances the characteristics of the ONL are in fact defined by these previous or current land uses. The Overview as written sets up an incorrect expectation that ONLs as mapped are in a natural state. The objective is also internally Inconsistent with policy NFL-P4 which correctly recognises that farming is part of ONLs.</p>	<p>Amend the Overview as follows: The Far North District has an extensive coastline with many harbours, large tracts of indigenous vegetation and a wide variety of natural processes that operate at varying scales. This has created a District rich in unique landscapes and features. In many instances, they are celebrated by cultural associations and stories. <del>Modification of these places has been minimal largely due to their remote locations, historic heritage and in some cases challenging topography and geomorphology</del></p>
<b>Philibert Jean-G Frick (S352)</b>	S352.006	Natural features and landscapes	Overview	Oppose	<p>The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's</p>	<p>Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct</p>



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					functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.150	Natural features and landscapes	Overview	Oppose	<p>While Federated Farmers supports the protection of outstanding natural features and landscapes, it considers that this must be done through the appropriate identification of the features and landscapes as well as with consultation with the impacted landowners who are the ones with the role of protecting such areas.</p> <p>Rural landowners are generally the ones who have preserved the landscapes and features on their properties around their working rural environment which is why such areas still exist today. If it was not for the landowners and the ability to graze around such areas the land would not be economically viable resulting in inappropriate subdivision, use and development to fund such land ownership.</p> <p>Federated Farmers strongly opposes restricting farming activities within outstanding natural landscapes and features. Farming activities are appropriate land use activities that still preserves the character and amenity value of such areas of significance.</p>	Amend the Overview to recognise and acknowledge the role that landowners have played and still play in the preservation of outstanding natural landscapes and features
<b>Maurice Dabbah (S422)</b>	S422.006	Natural features and landscapes	Overview	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents'] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation farming activities.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Bernard Sabrier (S423)</b>	S423.006	Natural features and landscapes	Overview	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents'] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Francois Dotta (S434)</b>	S434.006	Natural features and landscapes	Overview	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents'] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Elka Gouzer (S435)</b>	S435.006	Natural features and landscapes	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Kapiro Conservation Trust (S442)</b>	S442.098	Natural features and landscapes	Overview	Support in part	There is need to clarify that natural landscapes and features within the coastal environment which are not identified as ONL or ONF are addressed through provisions in the Coastal environment chapter.	Amend the overview to clarify that Coastal Environment cover landscapes and natural features that are not outstanding.
<b>Royal Forest and Bird Protection</b>	S511.079	Natural features and landscapes	Overview	Support in part	There is need to clarify that natural landscapes and features within the coastal environment which are not identified as ONL or ONF are	Amend the overview to clarify that Coastal Environment cover landscapes and natural features

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<b>Society of New Zealand (S511)</b>					addressed through provisions in the Coastal environment chapter.	that are not outstanding
<b>Russell Protection Society (INC) (S179)</b>	S179.076	Natural features and landscapes	Objectives	Support	In view of the fact that coastal zones are not provided for in the Proposed district plan, then the Coastal Environment, Natural Character and Natural Features and Landscape Overlays become very important in helping to define the boundaries of Russell and in safeguarding a suitable backdrop or canvass which to interpret and appreciate the historic township. It is especially important that these overlays provide adequate protection to the headlands framing Russell and the natural coastal escarpments that characterize the balance of the Russell Peninsula. For this reason it is important to control subdivision and development of coastal lands in the area.	Retain objectives
<b>MLP LLC (S183)</b>	S183.007	Natural features and landscapes	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Landing Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Landing Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Landing Scheme as well as the continuation of farming activities.
<b>Tryphena Trustees Limited, David Haythornwait e (S226)</b>	S226.007	Natural features and landscapes	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Isles Casey Trustee Services Limited, WWC Trustee Company Limited (S227)</b>	S227.007	Natural features and landscapes	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Jayesh Govind and Others (S228)</b>	S228.007	Natural features and landscapes	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Laurie Pearson (S229)</b>	S229.007	Natural features and landscapes	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Mataka Residents' Association Inc (S230)</b>	S230.007	Natural features and landscapes	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					the purpose of the Resource Management Act 1991 (RMA).	within the Mataka Scheme as well as the continuation of farming activities.
<b>Ovisnegra Limited (S231)</b>	S231.007	Natural features and landscapes	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Tobias Groser (S232)</b>	S232.007	Natural features and landscapes	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Whale Bay Limited (S233)</b>	S233.007	Natural features and landscapes	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Whale Bay Limited (S234)</b>	S234.007	Natural features and landscapes	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>WW Trustee Services 2016 Limited, Eloise Caroline Caswell, Donald Gordon Chandler (S235)</b>	S235.007	Natural features and landscapes	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Connemara Black Limited (S236)</b>	S236.007	Natural features and landscapes	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Evan Williams and Katherine Williams (S237)</b>	S237.007	Natural features and landscapes	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>John Gowing and Miriam Van Lith (S238)</b>	S238.007	Natural features and landscapes	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>John Gowing, Miriam Van Lith, Ellis Gowing, James Gowing, Byron Gowing (S239)</b>	S239.007	Natural features and landscapes	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Matthew Watson, Kaylene Watson, D R Thomas Limited (S240)</b>	S240.007	Natural features and landscapes	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Matthew Draper and Michaela Jannard (S241)</b>	S241.007	Natural features and landscapes	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<p><b>Nicole Way and Christopher Huljich as Trustees of the Trssh Birnie Settlement Trust (S345)</b></p>	<p>S345.009</p>	<p>Natural features and landscapes</p>	<p>Objectives</p>	<p>Oppose</p>	<p>The Resource Consents at Mataka Station enable development, and completion of the Mataka Station development, notwithstanding the provisions of the Proposed District Plan. The Proposed District Plan fails to recognise, have regard to, or provide for the development and subdivision enabled by the Resource Consents.</p> <p>The Proposed District Plan provisions will restrict development of the Property, and Mataka Station more generally, in a manner that is inconsistent with the Resource Consents and the integrated and comprehensive development authorised by those. The Council's s32 analysis does not mention, or consider approved but unimplemented developments within the Property and Mataka Station more generally, nor elsewhere. The "low intensity" development controls and height limits proposed within the Coastal Environment are given very little analysis.</p> <p>The proposed provisions are inconsistent with the Act and relevant planning instruments.</p>	<p>Amend to explicitly, and specifically provide for, and preserve the activities and land uses authorised under the Resource Consents at Mataka Station.</p> <p>and/or</p> <p>Insert a new special purpose zone and/or structure plan together with appropriate provisions (objectives, policies and rules) enabling the residential activity and development as is authorised by the Resource Consents as a permitted activity (where they are in general accordance with the Resource Consents) as well as appropriate activities within the Rural Production Zone, regardless of the provisions of the CE, ONL or HNC.</p> <p>and/or</p> <p>Amend the provisions of the Proposed District Plan to preserve the activities and buildings authorised by the Resource Consents on the Property.</p>
<p><b>Philibert Jean-G Frick (S352)</b></p>	<p>S352.007</p>	<p>Natural features and landscapes</p>	<p>Objectives</p>	<p>Oppose</p>	<p>The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).</p>	<p>Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.</p>



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Haititaimaran gai Marae Kaitiaki Trust (S394)</b>	S394.040	Natural features and landscapes	Objectives	Oppose	This chapter is void of any objective pertaining to managing activities adjacent to waterbodies. Such activities can result in adverse effects on cultural values, including as those values relate to ecological consideration.	Insert a new objective as follows: <b>Activities adjacent to waterbodies are managed in a way that avoids or minimises adverse effects on surface water.</b>
<b>Maurice Dabbah (S422)</b>	S422.007	Natural features and landscapes	Objectives	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents'] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings./structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Bernard Sabrier (S423)</b>	S423.007	Natural features and landscapes	Objectives	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents'] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)</b>	S425.033	Natural features and landscapes	Objectives	Support in part	PHTTCCT consider that the provisions do not adequately provide for the maintenance, operation and upgrade of regionally significant infrastructure in accordance with the RPS	Amend the provisions of NFL to ensure that maintenance, operation, and upgrade of regionally significant infrastructure is provided for.
<b>Francois Dotta (S434)</b>	S434.007	Natural features and landscapes	Objectives	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents'] Association by imposing undue restrictions on the construction of residential dwellings on the	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct

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					Site through the application of specified overlays and rules.	provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Elka Gouzer (S435)</b>	S435.007	Natural features and landscapes	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Michael John Winch (S67)</b>	S67.005	Natural features and landscapes	NFL-01	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	retain objectives
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.151	Natural features and landscapes	NFL-01	Support in part	Objective NFL-O1 needs to be more aligned with section 6(b) of the Resource Management Act 1991. The section requires the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development. It would be better for the objective to be consistent with the section so that it recognises that certain activities may be undertaken in the landscape or feature but are still considered appropriate for that specified area. If objective NFL-O1 is amended, there is no need to retain objective NFL-O2.	Amend Objective NFL-O1 as follows: <del>ONL and ONF are identified and managed to ensure their long-term protection for current and future generations.</del> <b>Outstanding natural features and landscapes that are important to the identity of the District are retained and protected from inappropriate subdivision, use and development.</b> or wording with similar intent
<b>Michael John Winch (S67)</b>	S67.021	Natural features and landscapes	NFL-02	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	retain objectives

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<b>Bentzen Farm Limited (S167)</b>	S167.031	Natural features and landscapes	NFL-02	Oppose	<p>By its nature, land use and subdivision cannot be 'consistent with' the characteristics and qualities of an ONL or ONF. It can however not compromise their characteristics and values as have been identified by the higher order planning documents.</p> <p>The NRC Landscape Assessment Work Sheets refer to "values" not qualities. In order for this objective to be the most appropriate way to achieve the requirements of the RMA and give effect to the NPS (ie allow a measurable assessment), it should use the same language as the Landscape Assessment methodology. "Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used thoroughly this objectives and policy set.</p>	<p>Amend Objective NFL-02 as follows: Land use and subdivision in ONL and ONF <del>is consistent with and</del> does not compromise the <b>identified</b> characteristics and <del>qualities</del> values of that landscape or feature. Or alternatively <b>The identified characteristics and values of ONLs and ONFs are protected from inappropriate subdivision, use and development.</b></p>
<b>Setar Thirty Six Limited (S168)</b>	S168.034	Natural features and landscapes	NFL-02	Oppose	<p>By its nature, land use and subdivision cannot be 'consistent with' the characteristics and qualities of an ONL or ONF: those being defined by a current state. It can however not compromise their characteristics and values as have been identified by the higher order planning documents.</p> <p>The NRC Landscape Assessment Work Sheets refer to "values" not qualities. In order for this objective to be the most appropriate way to achieve the requirements of the RMA and give effect to the NPS (ie allow a measurable assessment), it should use the same language as the Landscape Assessment methodology.</p> <p>"Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used thoroughly this objectives and policy set.</p>	<p>Amend Objective NFL-02 as follows: Land use and subdivision in ONL and ONF <del>is consistent with and</del> does not compromise the <b>identified</b> characteristics and qualities values of that landscape or feature. Or alternatively <b>The identified characteristics and values of ONLs and ONFs are protected from inappropriate subdivision, use and development.</b></p>
<b>The Shooting Box Limited (S187)</b>	S187.027	Natural features and landscapes	NFL-02	Oppose	<p>By its nature, land use and subdivision cannot be 'consistent with' the characteristics and qualities of an ONL or ONF: those being defined</p>	<p>Amend Objective NFL-02 as follows: Land use and subdivision in ONL</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>by a current state. It can however not compromise their characteristics and values as have been identified by the higher order planning documents.</p> <p>The NRC Landscape Assessment Work Sheets refer to "values" not qualities. In order for this objective to be the most appropriate way to achieve the requirements of the RMA and give effect to the NPS (ie allow a measurable assessment), it should use the same language as the Landscape Assessment methodology. "Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used thoroughly this objectives ad policy set.</p> <p>"Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used thoroughly this objectives ad policy set.</p>	<p>and ONF is <del>consistent with</del> and does not compromise the <b>identified</b> characteristics and <b>qualities values</b> of that landscape or feature.<b>Or alternativelyThe identified characteristics and values of ONLs and ONFs are protected from inappropriate subdivision, use and development.</b></p>
<p><b>Wendover Two Limited (S222)</b></p>	<p>S222.034</p>	<p>Natural features and landscapes</p>	<p>NFL-02</p>	<p>Oppose</p>	<p>By its nature, land use and subdivision cannot be 'consistent with' the characteristics and qualities of an ONL or ONF: those being defined by a current state. It can however not compromise their characteristics and values as have been identified by the higher order planning documents.</p> <p>The NRC Landscape Assessment Work Sheets refer to "values" not qualities. In order for this objective to be the most appropriate way to achieve the requirements of the RMA and give effect to the NPS (ie allow a measurable assessment), it should use the same language as the Landscape Assessment methodology. "Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used</p>	<p>Amend Objective NFL-O2 as follows: Land use and subdivision in ONL and ONF is <del>consistent with</del> and does not compromise the <b>identified</b> characteristics and <b>qualities values</b> of that landscape or feature. Or alternatively <b>The identified characteristics and values of ONLs and ONFs are protected from inappropriate subdivision, use and development.</b></p>

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					thoroughly this objectives ad policy set.	
<b>Matauri Trustee Limited (S243)</b>	S243.049	Natural features and landscapes	NFL-02	Oppose	<p>By its nature, land use and subdivision cannot be 'consistent with' the characteristics and qualities of an ONL or ONF: those being defined by a current state. It can however not compromise their characteristics and values as have been identified by the higher order planning documents.</p> <p>The NRC Landscape Assessment Work Sheets refer to "values" not qualities. In order for this objective to be the most appropriate way to achieve the requirements of the RMA and give effect to the NPS (i.e. allow a measurable assessment), it should use the same language as the Landscape Assessment methodology. "Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used thoroughly this objectives ad policy set.</p>	<p>Amend Objective NFL-02 as follows: Land use and subdivision in ONL and ONF <del>is consistent with and</del> does not compromise the <b>identified</b> characteristics and <del>qualities</del> <b>values</b> of that landscape or feature. Or alternatively<b>The identified characteristics and values of ONLs and ONFs are protected from inappropriate subdivision, use and development..</b></p>
<b>P S Yates Family Trust (S333)</b>	S333.026	Natural features and landscapes	NFL-02	Support in part	<p>By its nature, land use and subdivision cannot be 'consistent with' the characteristics and qualities of an ONL or ONF: those being defined by a current state. It can however not compromise their characteristics and values as have been identified by the higher order planning documents.</p> <p>The NRC Landscape Assessment Work Sheets refer to "values" not qualities. In order for this objective to be the most appropriate way to achieve the requirements of the RMA and give effect to the NPS (ie allow a measurable assessment), it should use the same</p>	<p>Amend Objective NFL-02 as follows: Land use and subdivision in ONL and ONF <del>is consistent with and</del> does not compromise the <b>identified</b> characteristics and <del>qualities</del> <b>values</b> of that landscape or feature. Or alternatively<b>The identified characteristics and values of ONLs and ONFs are protected from inappropriate subdivision, use and development.</b></p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					language as the Landscape Assessment methodology. "Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used thoroughly this objectives ad policy set.	
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.152	Natural features and landscapes	NFL-02	Support in part	Objective NFL-O1 needs to be more aligned with section 6(b) of the Resource Management Act 1991. The section requires the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development. It would be better for the objective to be consistent with the section so that it recognises that certain activities may be undertaken in the landscape or feature but are still considered appropriate for that specified area. If objective NFL-O1 is amended, there is no need to retain objective NFL-O2.	Delete Objective NFL-O2
<b>Transpower New Zealand Ltd (S454)</b>	S454.090	Natural features and landscapes	NFL-02	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 objective NFL-O2 as follows: <b>Subject to I-Px</b> , Land use and subdivision in ONL and ONF is consistent with and does not compromise the characteristics and qualities of that landscape or feature.
<b>Michael John Winch (S67)</b>	S67.022	Natural features and landscapes	NFL-03	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	retain objectives
<b>Haitaitamaran gai Marae Kaitiaki Trust (S394)</b>	S394.035	Natural features and landscapes	NFL-03	Support	This assists in effecting s 6(e) RMA.	Retain Objective NFL-O3

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Bentzen Farm Limited (S167)</b>	S167.039	Natural features and landscapes	Policies	Oppose	The Proposed Plan does not provide appropriate recognition of existing and/or authorised subdivision, use and development in ONLs and ONFs. ONLs have been enhanced through development and subdivision. Such activities have been deemed to be appropriate in the past and in the more recent past, typically subject to legally binding ongoing obligations to protect and enhance the values which comprise the ONL or ONF. A new policy is required to recognise the positive benefits.	Insert a new policy as follows: <b>Recognise that identified ONLs and ONFs may contain existing and/or authorised subdivision, use and development and provide for these activities.</b>
<b>Setar Thirty Six Limited (S168)</b>	S168.042	Natural features and landscapes	Policies	Oppose	As drafted, the Proposed Plan does not provide appropriate recognition of existing and/or authorised subdivision, use and development in ONLs and ONFs. Many values and characteristics of ONLs have been enhanced through development and subdivision through for example native planting regeneration and its ongoing protection. Such activities have been deemed to be appropriate in the past and in the more recent past, typically subject to legally binding ongoing obligations to protect and enhance the values which comprise the ONL or ONF. A new policy is required to recognise the positive benefits that can accrue from such activities and enable their continuation	Insert a new policy as follows: <b>Recognise that identified ONLs and ONFs may contain existing and/or authorised subdivision, use and development and provide for these activities.</b>
<b>Russell Protection Society (INC) (S179)</b>	S179.077	Natural features and landscapes	Policies	Support	In view of the fact that coastal zones are not provided for in the Proposed district plan, then the Coastal Environment, Natural Character and Natural Features and Landscape Overlays become very important in helping to define the boundaries of Russell and in safeguarding a suitable backdrop or canvass which to interpret and appreciate the historic township. It is especially important that these overlays provide adequate protection to the headlands framing Russell and the natural coastal escarpments that characterize the balance of the Russell Peninsula. For this reason it is important to control subdivision and development of coastal lands in the area.	Retain policies

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>MLP LLC (S183)</b>	S183.008	Natural features and landscapes	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Landing Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Landing Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Landing Scheme as well as the continuation of farming activities.
<b>The Shooting Box Limited (S187)</b>	S187.034	Natural features and landscapes	Policies	Oppose	As drafted, the Proposed Plan does not provide appropriate recognition of existing and/or authorised subdivision, use and development in ONLs and ONFs. Many values and characteristics of ONLs have been enhanced through development and subdivision through for example native planting regeneration and its ongoing protection. Such activities have been deemed to be appropriate in the past and in the more recent past, typically subject to legally binding ongoing obligations to protect and enhance the values which comprise the ONL or ONF. A new policy is required to recognise the positive benefits that can accrue from such activities and enable their continuation.	Insert a new policy as follows: <b>Recognise that identified ONLs and ONFs may contain existing and/or authorised subdivision, use and development and provide for these activities.</b>
<b>Wendover Two Limited (S222)</b>	S222.042	Natural features and landscapes	Policies	Oppose	As drafted, the Proposed Plan does not provide appropriate recognition of existing and/or authorised subdivision, use and development in ONLs and ONFs. Many values and characteristics of ONLs have been enhanced through development and subdivision through for example native planting regeneration and its ongoing protection. Such activities have been deemed to be appropriate in the past and in the more recent past, typically subject to legally binding ongoing obligations to protect and enhance the values which comprise the ONL or ONF. A new policy is required to recognise the	Insert a new policy as follows: <b>Recognise that identified ONLs and ONFs may contain existing and/or authorised subdivision, use and development and provide for these activities.</b>



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					positive benefits that can accrue from such activities and enable their continuation.	
<b>Tryphena Trustees Limited, David Haythornwait e (S226)</b>	S226.008	Natural features and landscapes	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Isles Casey Trustee Services Limited, WWC Trustee Company Limited (S227)</b>	S227.008	Natural features and landscapes	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Jayesh Govind and Others (S228)</b>	S228.008	Natural features and landscapes	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Laurie Pearson (S229)</b>	S229.008	Natural features and landscapes	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						as the continuation of farming activities.
<b>Mataka Residents' Association Inc (S230)</b>	S230.008	Natural features and landscapes	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Ovisnegra Limited (S231)</b>	S231.008	Natural features and landscapes	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Tobias Groser (S232)</b>	S232.008	Natural features and landscapes	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Whale Bay Limited (S233)</b>	S233.008	Natural features and landscapes	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Whale Bay Limited (S234)</b>	S234.008	Natural features and landscapes	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>WW Trustee Services 2016 Limited, Eloise Caroline Caswell, Donald Gordon Chandler (S235)</b>	S235.008	Natural features and landscapes	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Connemara Black Limited (S236)</b>	S236.008	Natural features and landscapes	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Evan Williams and Katherine Williams (S237)</b>	S237.008	Natural features and landscapes	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>John Gowing and Miriam Van Lith (S238)</b>	S238.008	Natural features and landscapes	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>John Gowing, Miriam Van Lith, Ellis Gowing, James Gowing, Byron Gowing (S239)</b>	S239.008	Natural features and landscapes	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Matthew Watson, Kaylene Watson, D R Thomas Limited (S240)</b>	S240.008	Natural features and landscapes	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Matthew Draper and Michaela Jannard (S241)</b>	S241.008	Natural features and landscapes	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Matauri Trustee Limited (S243)</b>	S243.057	Natural features and landscapes	Policies	Oppose	As drafted, the Proposed Plan does not provide appropriate recognition of existing and/or authorised subdivision, use and development in ONLs and ONFs. Many values and characteristics of ONLs have been enhanced through development and subdivision through for example native plating regeneration and its ongoing protection. Such activities have been deemed to be appropriate in the past and in the more recent past, typically subject to legally binding ongoing obligations to protect and enhance the values which comprise the ONL or ONF. A new policy is required to recognise the positive benefits that can accrue from such activities and enable their continuation.	Insert new policy as follows: <b>Recognise that identified ONLs and ONFs may contain existing and/or authorised subdivision, use and development and provide for these activities.</b>
<b>P S Yates Family Trust (S333)</b>	S333.034	Natural features and landscapes	Policies	Not Stated	As drafted, the Proposed Plan does not provide appropriate recognition of existing and/or authorised subdivision, use and development in ONLs and ONFs. Many values and characteristics of ONLs have been enhanced through development and subdivision through for example native plating regeneration and its ongoing protection. Such activities have been deemed to be appropriate in the past and in the more recent past, typically subject to legally binding ongoing obligations to protect and enhance the values which comprise the ONL or ONF. A new policy is required to recognise the positive benefits that can accrue from such activities and enable their continuation	Insert a new policy as follows: <b>Recognise that identified ONLs and ONFs may contain existing and/or authorised subdivision, use and development and provide for these activities.</b>
<b>Nicole Way and Christopher Huljich as</b>	S345.010	Natural features and landscapes	Policies	Oppose	The Resource Consents at Mataka Station enable development, and completion of the Mataka Station development, notwithstanding the provisions of the Proposed District Plan.	Amend to explicitly, and specifically provide for, and preserve the activities and land uses authorised under the

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Trustees of the Trssh Birnie Settlement Trust (S345)</b>					<p>The Proposed District Plan fails to recognise, have regard to, or provide for the development and subdivision enabled by the Resource Consents.</p> <p>The Proposed District Plan provisions will restrict development of the Property, and Mataka Station more generally, in a manner that is inconsistent with the Resource Consents and the integrated and comprehensive development authorised by those. The Council's s32 analysis does not mention, or consider approved but unimplemented developments within the Property and Mataka Station more generally, nor elsewhere. The "low intensity" development controls and height limits proposed within the Coastal Environment are given very little analysis.</p> <p>The proposed provisions are inconsistent with the Act and relevant planning instruments.</p>	<p>Resource Consents at Mataka Station.</p> <p>and/or</p> <p>Insert a new special purpose zone and/or structure plan together with appropriate provisions (objectives, policies and rules) enabling the residential activity and development as is authorised by the Resource Consents as a permitted activity (where they are in general accordance with the Resource Consents) as well as appropriate activities within the Rural Production Zone, regardless of the provisions of the CE, ONL or HNC.</p> <p>and/or</p> <p>Amend the provisions of the Proposed District Plan to preserve the activities and buildings authorised by the Resource Consents on the Property.</p>
<b>Philibert Jean-G Frick (S352)</b>	S352.008	Natural features and landscapes	Policies	Oppose	<p>The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).</p>	<p>Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.</p>
<b>Haitaimaran gai Marae Kaitiaki Trust (S394)</b>	S394.039	Natural features and landscapes	Policies	Oppose	<p>Adverse effects on cultural values must be managed appropriately as a part of any subdivision, not just considered.</p>	<p>Insert a new policy as follows: <b>Avoid any significant adverse cultural effects and avoid, remedy or mitigate any other adverse cultural effects.</b></p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Maurice Dabbah (S422)</b>	S422.008	Natural features and landscapes	Policies	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents'] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Bernard Sabrier (S423)</b>	S423.008	Natural features and landscapes	Policies	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents'] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)</b>	S425.034	Natural features and landscapes	Policies	Support in part	PHTTCCT consider that the provisions do not adequately provide for the maintenance, operation and upgrade of regionally significant infrastructure in accordance with the RPS	Amend the provisions of NFL to ensure that maintenance, operation, and upgrade of regionally significant infrastructure is provided for.
<b>John Andrew Riddell (S431)</b>	S431.161	Natural features and landscapes	Policies	Not Stated	The amendment is necessary in order to achieve the purpose of the Act.	Insert the following new policy: <b>That the cumulative effect of changes to the character of Outstanding Landscapes be taken into account in assessing applications for resource consent.</b>
<b>John Andrew Riddell (S431)</b>	S431.162	Natural features and landscapes	Policies	Not Stated	The amendment is necessary in order to achieve the purpose of the Act.	Insert the following new policy: <b>That the visibility of Outstanding Landscape Features, when viewed from</b>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<b>public places, be taken into account in assessing applications for resource consent</b>
<b>John Andrew Riddell (S431)</b>	S431.163	Natural features and landscapes	Policies	Not Stated	The amendment is necessary in order to achieve the purpose of the Act.	Insert the following new policy: <b>That activities avoid or mitigate adverse effects on the scientific and amenity values associated with outstanding natural features.</b>
<b>John Andrew Riddell (S431)</b>	S431.164	Natural features and landscapes	Policies	Not Stated	The amendment is necessary in order to achieve the purpose of the Act.	Insert the following new policy: <b>That the high value of indigenous vegetation to Outstanding Landscapes be taken into account when assessing applications for resource consents.</b>
<b>John Andrew Riddell (S431)</b>	S431.165	Natural features and landscapes	Policies	Not Stated	The amendment is necessary in order to achieve the purpose of the Act.	Insert the following new policy: <b>That landscape values be protected by encouraging development that takes in account: (a) the rarity or value of the landscape and/or landscape features; (b) the visibility of the development; (c) important views as seen from public vantage points on a public road, public reserve, the foreshore and the coastal</b>



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p><b>marine area; (d) the desirability of avoiding adverse effects on the elements that contribute to the distinctive character of the coastal landscapes, especially outstanding landscapes and natural features, ridges and headlands or those features that have significant amenity value; (e) the contribution of natural patterns, composition and extensive cover of indigenous vegetation to landscape values; (f) Maori cultural values associated with landscapes; (g) the importance of the activity in enabling people and communities to provide for their social, economic and cultural well-being.</b></p>
<p><b>Francois Dotta (S434)</b></p>	<p>S434.008</p>	<p>Natural features and landscapes</p>	<p>Policies</p>	<p>Oppose</p>	<p>The Proposed Plan, if approved, will directly affect members of the [Mataka Residents] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.</p>	<p>Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Elka Gouzer (S435)</b>	S435.008	Natural features and landscapes	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Natural features and landscapes chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
<b>Michael John Winch (S67)</b>	S67.006	Natural features and landscapes	NFL-P1	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	retain the policies
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.070	Natural features and landscapes	NFL-P1	Support	not stated	Retain NFL-P1 as notified
<b>Michael John Winch (S67)</b>	S67.023	Natural features and landscapes	NFL-P2	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	Retain the policies
<b>Bentzen Farm Limited (S167)</b>	S167.032	Natural features and landscapes	NFL-P2	Oppose	By its nature, land use and subdivision cannot be 'consistent with' the characteristics and qualities of an ONL or ONF. It can however not compromise their characteristics and values as have been identified by the higher order planning documents. The NRC Landscape Assessment Work Sheets refer to "values" not qualities. In order for this objective to be the most appropriate way to achieve the requirements of the RMA and give effect to the NPS (ie allow a measurable assessment), it should use the same language as the Landscape Assessment methodology. "Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used thoroughly this objectives and policy set.	Amend Policy NFL-P2 as follows: Avoid adverse effects of land use and subdivision on the <b>identified</b> characteristics and <b>qualities values</b> of ONL and ONF within the coastal environment.
<b>Setar Thirty Six Limited (S168)</b>	S168.035	Natural features and landscapes	NFL-P2	Oppose	By its nature, land use and subdivision cannot be 'consistent with' the characteristics and qualities of an ONL or ONF: those being defined by a current state. It can however not	Amend Policy NFL-P2 as follows: Avoid adverse effects of land use and subdivision on the <b>identified</b> characteristics and <b>qualities</b>

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					<p>compromise their characteristics and values as have been identified by the higher order planning documents.</p> <p>The NRC Landscape Assessment Work Sheets refer to "values" not qualities. In order for this objective to be the most appropriate way to achieve the requirements of the RMA and give effect to the NPS (ie allow a measurable assessment), it should use the same language as the Landscape Assessment methodology.</p> <p>"Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used thoroughly this objectives and policy set.</p>	<p><b>values</b> of ONL and ONF within the coastal environment.</p>
<p><b>The Shooting Box Limited (S187)</b></p>	<p>S187.028</p>	<p>Natural features and landscapes</p>	<p>NFL-P2</p>	<p>Oppose</p>	<p>By its nature, land use and subdivision cannot be 'consistent with' the characteristics and qualities of an ONL or ONF: those being defined by a current state. It can however not compromise their characteristics and values as have been identified by the higher order planning documents.</p> <p>The NRC Landscape Assessment Work Sheets refer to "values" not qualities. In order for this objective to be the most appropriate way to achieve the requirements of the RMA and give effect to the NPS (ie allow a measurable assessment), it should use the same language as the Landscape Assessment methodology. "Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used thoroughly this objectives ad policy set.</p> <p>"Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy.</p>	<p>Amend Policy NFL-P2 as follows: Avoid adverse effects of land use and subdivision on the <b>identified</b> characteristics and <del>qualities</del> <b>values</b> of ONL and ONF within the coastal environment.</p>

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					This should be consistently used thoroughly this objectives ad policy set.	
<b>Wendover Two Limited (S222)</b>	S222.035	Natural features and landscapes	NFL-P2	Support in part	<p>By its nature, land use and subdivision cannot be 'consistent with' the characteristics and qualities of an ONL or ONF: those being defined by a current state. It can however not compromise their characteristics and values as have been identified by the higher order planning documents.</p> <p>The NRC Landscape Assessment Work Sheets refer to "values" not qualities. In order for this objective to be the most appropriate way to achieve the requirements of the RMA and give effect to the NPS (ie allow a measurable assessment), it should use the same language as the Landscape Assessment methodology. "Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used thoroughly this objectives ad policy set.</p>	Amend Policy NFL-P2 as follows: Avoid adverse effects of land use and subdivision on the <b>identified</b> characteristics and <del>qualities</del> <b>values</b> of ONL and ONF within the coastal environment.
<b>Matauri Trustee Limited (S243)</b>	S243.050	Natural features and landscapes	NFL-P2	Oppose	<p>By its nature, land use and subdivision cannot be 'consistent with' the characteristics and qualities of an ONL or ONF: those being defined by a current state. It can however not compromise their characteristics and values as have been identified by the higher order planning documents.</p> <p>The NRC Landscape Assessment Work Sheets refer to "values" not qualities. In order for this objective to be the most appropriate way to achieve the requirements of the RMA and give effect to the NPS (i.e. allow a measurable assessment), it should use the same language as the Landscape Assessment methodology. "Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used thoroughly this objectives ad policy set.</p>	Amend Policy NFL-P2 as follows: Avoid adverse effects of land use and subdivision on the <b>identified</b> characteristics and <del>qualities</del> <b>values</b> of ONL and ONF within the coastal environment.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>P S Yates Family Trust (S333)</b>	S333.027	Natural features and landscapes	NFL-P2	Support in part	By its nature, land use and subdivision cannot be 'consistent with' the characteristics and qualities of an ONL or ONF: those being defined by a current state. It can however not compromise their characteristics and values as have been identified by the higher order planning documents. The NRC Landscape Assessment Work Sheets refer to "values" not qualities. In order for this objective to be the most appropriate way to achieve the requirements of the RMA and give effect to the NPS (ie allow a measurable assessment), it should use the same language as the Landscape Assessment methodology. "Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used thoroughly this objectives ad policy set.	Amend Policy NFL-P2 as follows: Avoid adverse effects of land use and subdivision on the <b>identified</b> characteristics and <del>qualities</del> <b>values</b> of ONL and ONF within the coastal environment
<b>Haitaimaran gai Marae Kaitiaki Trust (S394)</b>	S394.036	Natural features and landscapes	NFL-P2	Support	This neatly implements s 6(b) RMA.	Retain Policy NFL-P2
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.153	Natural features and landscapes	NFL-P2	Support in part	Policies NFL-P2, NFL-P3 and NFL-P7 need to be amended so that they are consistent with the relief sought by Federated Farmers for objectives NFL-O1 and NFL-O2 above. The policies need to focus on avoiding inappropriate subdivision, use and development within the two layers while recognising certain activities can	Amend Policy NFL-P2 to achieve consistency with section 6 of the Resource Management Act 1991 and to recognise the need to allow appropriate subdivision, use and development

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					occur as long as they are appropriate for the areas.	
<b>Transpower New Zealand Ltd (S454)</b>	S454.091	Natural features and landscapes	NFL-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 policy NFL-P2 as follows: Avoid adverse effects of land use and subdivision on the characteristics and qualities of ONL and ONF within the coastal environment, <b>subject to Policy I-Px.</b>
<b>Michael John Winch (S67)</b>	S67.024	Natural features and landscapes	NFL-P3	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	Retain the policies
<b>Bentzen Farm Limited (S167)</b>	S167.033	Natural features and landscapes	NFL-P3	Oppose	By its nature, land use and subdivision cannot be 'consistent with' the characteristics and qualities of an ONL or ONF. It can however not compromise their characteristics and values as have been identified by the higher order planning documents. The NRC Landscape Assessment Work Sheets refer to "values" not qualities. In order for this objective to be the most appropriate way to achieve the requirements of the RMA and give effect to the NPS (ie allow a measurable assessment), it should use the same language as the Landscape Assessment methodology. "Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used thoroughly this objectives and policy set	Amend Policy NFL-P3 as follows: Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on the <b>identified</b> characteristics and <del>qualities</del> <b>values</b> of ONL and ONF outside the coastal environment.
<b>Setar Thirty Six Limited (S168)</b>	S168.036	Natural features and landscapes	NFL-P3	Oppose	By its nature, land use and subdivision cannot be 'consistent with' the characteristics and qualities of an ONL or ONF: those being defined by a current state. It can however not compromise their characteristics and values as have been identified by the higher order planning documents.  The NRC Landscape Assessment Work Sheets refer to "values" not qualities. In order for this	Amend Policy NFL-P3 as follows: Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on the <b>identified</b> characteristics and <del>qualities</del> <b>values</b> of ONL and ONF outside the coastal environment.

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					<p>objective to be the most appropriate way to achieve the requirements of the RMA and give effect to the NPS (ie allow a measurable assessment), it should use the same language as the Landscape Assessment methodology.</p> <p>"Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used thoroughly this objectives and policy set.</p>	
<p><b>The Shooting Box Limited (S187)</b></p>	<p>S187.098</p>	<p>Natural features and landscapes</p>	<p>NFL-P3</p>	<p>Oppose</p>	<p>By its nature, land use and subdivision cannot be 'consistent with' the characteristics and qualities of an ONL or ONF: those being defined by a current state. It can however not compromise their characteristics and values as have been identified by the higher order planning documents.</p> <p>The NRC Landscape Assessment Work Sheets refer to "values" not qualities. In order for this objective to be the most appropriate way to achieve the requirements of the RMA and give effect to the NPS (ie allow a measurable assessment), it should use the same language as the Landscape Assessment methodology. "Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used thoroughly this objectives ad policy set.</p>	<p>Amend Policy NFL-P3 as follows: Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on the <b>identified characteristics and qualities values</b> of ONL and ONF outside the coastal environment.</p>
<p><b>Wendover Two Limited (S222)</b></p>	<p>S222.036</p>	<p>Natural features and landscapes</p>	<p>NFL-P3</p>	<p>Support in part</p>	<p>By its nature, land use and subdivision cannot be 'consistent with' the characteristics and qualities of an ONL or ONF: those being defined by a current state. It can however not compromise their characteristics and values as have been identified by the higher order planning documents.</p> <p>The NRC Landscape Assessment Work Sheets refer to "values" not qualities. In order for this objective to be the most appropriate way to achieve the requirements of the RMA and give effect to the NPS (ie allow a measurable</p>	<p>Amend Policy NFL-P3 as follows: Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on the <b>identified characteristics and qualities values</b> of ONL and ONF outside the coastal environment.</p>

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					assessment), it should use the same language as the Landscape Assessment methodology. "Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used thoroughly this objectives ad policy set.	
<b>Matauri Trustee Limited (S243)</b>	S243.051	Natural features and landscapes	NFL-P3	Oppose	<p>By its nature, land use and subdivision cannot be 'consistent with' the characteristics and qualities of an ONL or ONF: those being defined by a current state. It can however not compromise their characteristics and values as have been identified by the higher order planning documents.</p> <p>The NRC Landscape Assessment Work Sheets refer to "values" not qualities. In order for this objective to be the most appropriate way to achieve the requirements of the RMA and give effect to the NPS (i.e. allow a measurable assessment), it should use the same language as the Landscape Assessment methodology. "Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used thoroughly this objectives ad policy set.</p>	Amend Policy NFL-P3 as follows: Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on the <b>identified characteristics and values</b> of ONL and ONF outside the coastal environment.
<b>P S Yates Family Trust (S333)</b>	S333.028	Natural features and landscapes	NFL-P3	Support in part	<p>By its nature, land use and subdivision cannot be 'consistent with' the characteristics and qualities of an ONL or ONF: those being defined by a current state. It can however not compromise their characteristics and values as have been identified by the higher order planning documents.</p> <p>The NRC Landscape Assessment Work Sheets refer to "values" not qualities. In order for this objective to be</p>	Amend Policy NFL-P3 as follows: Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on the <b>identified characteristics and values</b> of ONL and ONF outside the coastal environment



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					the most appropriate way to achieve the requirements of the RMA and give effect to the NPS (ie allow a measurable assessment), it should use the same language as the Landscape Assessment methodology. "Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used thoroughly this objectives ad policy set.	
<b>Haititaimaran gai Marae Kaitiaki Trust (S394)</b>	S394.037	Natural features and landscapes	NFL-P3	Support in part	A number of characteristics or qualities may count towards a site qualifying as ONF or ONL. It is important that adverse effects are appropriately addressed with respect to each characteristic or quality to ensure protection on the round, as required by s 6(b) RMA.	Amend Policy NFL-P3 as follows: Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on <b>any of</b> the characteristics and qualities of ONL and ONF outside the coastal environment.
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.154	Natural features and landscapes	NFL-P3	Support in part	Policies NFL-P2, NFL-P3 and NFL-P7 need to be amended so that they are consistent with the relief sought by Federated Farmers for objectives NFL-O1 and NFL-O2 above. The policies need to focus on avoiding inappropriate subdivision, use and development within the two layers while recognising certain activities can occur as long as they are appropriate for the areas.	Amend Policy NFL-P3 to achieve consistency with section 6 of the Resource Management Act 1991 and to recognise the need to allow appropriate subdivision, use and development
<b>Transpower New Zealand Ltd (S454)</b>	S454.092	Natural features and landscapes	NFL-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 policy NFL-P3 (inferred) as follows: <b>Subject to I-Px</b> , Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						use and subdivision on the characteristics and qualities of ONL and ONF outside the coastal environment.
<b>Michael John Winch (S67)</b>	S67.025	Natural features and landscapes	NFL-P4	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	Retain the policies
<b>PF Olsen Limited (S91)</b>	S91.010	Natural features and landscapes	NFL-P4	Oppose	Policy NFL-P4 is an unacceptable form of grandparenting existing land use, favouring one form of primary production over others.	Amend Policy NFL-P4 to apply to all primary production activities.
<b>Summit Forests New Zealand Limited (S148)</b>	S148.027	Natural features and landscapes	NFL-P4	Not Stated	The chapter on Outstanding Natural Landscapes (ONL) and Outstanding Natural Features (ONF) fails to provide equitably for all primary production activities. In particular, it fails to recognise that, where plantation forestry already exists within an ONL or ONF, it should be considered as a legitimate part of the landscape and provided for as a permitted activity subject to the provisions of the NES-PF. Policy NFL-P4 seeks to grandparent an existing land use that may be or could become unsustainable both in terms of economic and environmental effects. The Plan should allow for all primary production activities subject to managing any adverse effects.	Amend NPFL-P4 to read " Provide for primary production activities within ONL and on ONF where: a. the use forms part of the characteristics and qualities that established the landscape or feature; and b. the use is consistent with, and does not compromise the characteristics and qualities of the landscape or feature." and
<b>Horticulture New Zealand (S159)</b>	S159.060	Natural features and landscapes	NFL-P4	Oppose	The policy only provides for farming (including horticulture) in limited circumstances. Given the extent of Outstanding Natural Features and Outstanding Natural Landscapes in the Far North this is limiting	Amend Policy NFL-P4 to include an additional clause: <b>c) the activity is an existing land use</b>
<b>Manulife Forest Management (NZ) Ltd (S160)</b>	S160.021	Natural features and landscapes	NFL-P4	Oppose	The submitter opposes policy NFL-P4 and considers the policy to be very subjective and can be interpreted in many ways, and that including only farming and not all primary production is not fair or equitable.	Amend policy as follows: Provide for <b>primary production</b> activities within ONL and on ONF where:  1. the use forms part of the characteristics and qualities that

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						<p>established the landscape or feature; and</p> <p>2. the use is consistent with, and does not compromise the characteristics and qualities of the landscape or feature.</p> <p>to provide for primary production activities within ONL and ONF.</p>
<p><b>Bentzen Farm Limited (S167)</b></p>	<p>S167.034</p>	<p>Natural features and landscapes</p>	<p>NFL-P4</p>	<p>Support in part</p>	<p>The policy provides appropriate recognition that farming should be provided for in ONLs and ONFs and that the use can form part of the characteristics and values that established the landscape or feature.</p> <p>By its nature, land use and subdivision cannot be 'consistent with' the characteristics and qualities of an ONL or ONF: those being defined by a current state. It can however not compromise their characteristics and values as have been identified by the higher order planning documents.</p> <p>The NRC Landscape Assessment Work Sheets refer to "values" not qualities. In order for this objective to be the most appropriate way to achieve the requirements of the RMA and give effect to the NPS (ie allow a measurable assessment), it should use the same language as the Landscape Assessment methodology.</p> <p>"Identified" characteristics has been correctly used in policy NFL-P5, allowing a more measurable test of compliance with the policy. This should be consistently used thoroughly this objectives ad policy set.</p>	<p>Amend Policy NFL-P4 as follows: Provide for farming activities within ONL and on ONF where:</p> <p>a. the use forms part of the <b>identified</b> characteristics and <b>qualities values</b> that established the landscape or feature; and</p> <p>b. the use is consistent with, and does not compromise the characteristics and qualities of the landscape or feature.</p>

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<b>Setar Thirty Six Limited (S168)</b>	S168.037	Natural features and landscapes	NFL-P4	Support in part	The policy provides appropriate recognition that farming should be provided for in ONLs and ONFs and that the use can form part of the characteristics and values that established the landscape or feature.	Amend Policy NFL-P4 as follows: Provide for farming activities within ONL and on ONF where: a. the use forms part of the <b>identified</b> characteristics and <b>qualities values</b> that established the landscape or feature; and ...
<b>The Shooting Box Limited (S187)</b>	S187.029	Natural features and landscapes	NFL-P4	Support in part	The policy provides appropriate recognition that farming should be provided for in ONLs and ONFs and that the use can form part of the characteristics and values that established the landscape or feature.	Amend Policy NFL-P4 as follows: Provide for farming activities within ONL and on ONF where: a. the use forms part of the <b>identified</b> characteristics and <b>qualities values</b> that established the landscape or feature; and b. the use is consistent with, and does not compromise the characteristics and qualities of the landscape or feature.
<b>Thomson Survey Ltd (S198)</b>	S198.001	Natural features and landscapes	NFL-P4	Oppose	The submitter opposes NFL-P4 and contends that making any kind of farming within an ONL or ONF a discretionary activity is unjustified, unacceptable and unreasonable.	Delete NFL-P4
<b>Wendover Two Limited (S222)</b>	S222.037	Natural features and landscapes	NFL-P4	Support in part	The policy provides appropriate recognition that farming should be provided for in ONLs and ONFs and that the use can form part of the characteristics and values that established the landscape or feature. Changes are sought in line with reasons for submission point on NFL-O2	Amend Policy NFL-P4 as follows: Provide for farming activities within ONL and on ONF where: a. the use forms part of the <b>identified</b> characteristics and <b>qualities values</b> that established the landscape or feature; and b. the use is consistent with,

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						and does not compromise the characteristics and qualities of the landscape or feature.
<b>Matauri Trustee Limited (S243)</b>	S243.052	Natural features and landscapes	NFL-P4	Support in part	The policy provides appropriate recognition that farming should be provided for in ONLs and ONFs and that the use can form part of the characteristics and values that established the landscape or feature. Changes are sought in line with reasons for submission point on NFL-O2	Amend Policy NFL-P4 as follows: Provide for farming activities within ONL and on ONF where: a. the use forms part of the <b>identified</b> characteristics and <b>qualities values</b> that established the landscape or feature; and b. the use is consistent with, and does not compromise the characteristics and qualities of the landscape or feature.
<b>P S Yates Family Trust (S333)</b>	S333.029	Natural features and landscapes	NFL-P4	Support in part	The policy provides appropriate recognition that farming should be provided for in ONLs and ONFs and that the use can form part of the characteristics and values that established the landscape or feature. Changes are sought in line with reasons for submission point on NFL-O2	Amend Policy NFL-P4 as follows: Provide for farming activities within ONL and on ONF where: a. the use forms part of the <b>identified</b> characteristics and <b>qualities values</b> that established the landscape or feature; and b. the use is consistent with, and does not compromise the characteristics and qualities of the landscape or feature
<b>Michael John Winch (S67)</b>	S67.026	Natural features and landscapes	NFL-P5	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	Retain the policies

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<b>Bentzen Farm Limited (S167)</b>	S167.035	Natural features and landscapes	NFL-P5	Support in part	Support the use of 'identified' as has been used in this policy, but should be used elsewhere to allow a measurable method to determine compliance with the policy.	Amend Policy NFL-P5 as follows: Provide for the use of Māori Purpose zoned land and Treaty Settlement land in ONL and ONF where land use and subdivision is consistent with the ancestral use of that land and does not compromise any identified characteristics and <del>qualities</del> <b>values</b> .
<b>Setar Thirty Six Limited (S168)</b>	S168.038	Natural features and landscapes	NFL-P5	Support in part	Support the use of 'identified' as has been used in this policy, but should be used elsewhere to allow a measurable method to determine compliance with the policy.	Amend Policy NFL-P5 as follows: Provide for the use of Māori Purpose zoned land and Treaty Settlement land in ONL and ONF where land use and subdivision is consistent with the ancestral use of that land and does not compromise any identified characteristics and <del>qualities</del> <b>values</b>
<b>The Shooting Box Limited (S187)</b>	S187.030	Natural features and landscapes	NFL-P5	Support in part	Support the use of 'identified' as has been used in this policy, but should be used elsewhere to allow a measurable method to determine compliance with the policy.	Amend Policy NFL-P5 as follows: Provide for the use of Māori Purpose zoned land and Treaty Settlement land in ONL and ONF where land use and subdivision is consistent with the ancestral use of that land and does not compromise any identified characteristics and <del>qualities</del> <b>values</b> .
<b>Wendover Two Limited (S222)</b>	S222.038	Natural features and landscapes	NFL-P5	Support in part	Support the use of 'identified' as has been used in this policy, but should be used elsewhere to allow a measurable method to determine compliance with the policy.	Amend Policy NFL-P5 as follows: Provide for the use of Māori Purpose zoned land and Treaty Settlement land in ONL and ONF where land use and subdivision is consistent with the ancestral use of that land and does not

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						compromise any identified characteristics and <del>qualities</del> <b>values.</b>
<b>Matauri Trustee Limited (S243)</b>	S243.053	Natural features and landscapes	NFL-P5	Support in part	Support the use of 'identified' as has been used in this policy, but should be used elsewhere to allow a measurable method to determine compliance with the policy.	Amend Policy NFL-P5 as follows: Provide for the use of Māori Purpose zoned land and Treaty Settlement land in ONL and ONF where land use and subdivision is consistent with the ancestral use of that land and does not compromise any identified characteristics and <del>qualities</del> <b>values.</b>
<b>P S Yates Family Trust (S333)</b>	S333.030	Natural features and landscapes	NFL-P5	Support in part	Support the use of 'identified' as has been used in this policy, but should be used elsewhere to allow a measurable method to determine compliance with the policy.	Amend Policy NFL-P5 as follows: Provide for the use of Māori Purpose zoned land and Treaty Settlement land in ONL and ONF where land use and subdivision is consistent with the ancestral use of that land and does not compromise any identified characteristics and <del>qualities</del> <b>values.</b>
<b>Te Rūnanga o Ngāti Rēhia (S559)</b>	S559.025	Natural features and landscapes	NFL-P5	Support in part	There is no guarantee the land given back would have a known 'ancestral use' and dictating how we can utilise our treaty settlement land is contrary SD-CP-O1. It needs to be open to use and develop the land in a way that meets the aspirations of the landholders without adverse effects on the natural features and landscapes.	Amend NFL-P5 as follows: 'Provide for the use of Māori Purpose zoned land and Treaty Settlement land in ONL and ONF where land use and subdivision is consistent with the <del>ancestral use of that</del> land and does not compromise any identified characteristics and qualities.' (inferred).

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Michael John Winch (S67)</b>	S67.027	Natural features and landscapes	NFL-P6	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	Retain the policies
<b>Bentzen Farm Limited (S167)</b>	S167.036	Natural features and landscapes	NFL-P6	Support in part	The restoration and enhancement of ONLs and ONF should always be encouraged and to do otherwise may hold such areas in a degraded state.	Amend Policy NFL-P6 as follows: Encourage the restoration and enhancement of ONL and ONF <b>areas where it is consistent with the characteristics and qualities.</b>
<b>Setar Thirty Six Limited (S168)</b>	S168.039	Natural features and landscapes	NFL-P6	Support in part	The restoration and enhancement of ONLs and ONF should always be encouraged and to do otherwise may hold such areas in a degraded state.	Amend Policy NFL-P6 as follows: Encourage the restoration and enhancement of ONL and ONF <b>areas where it is consistent with the characteristics and qualities.</b>
<b>The Shooting Box Limited (S187)</b>	S187.031	Natural features and landscapes	NFL-P6	Support in part	The restoration and enhancement of ONLs and ONF should always be encouraged and to do otherwise may hold such areas in a degraded state.	Amend Policy NFL-P6 as follows: Encourage the restoration and enhancement of ONL and ONF <b>areas where it is consistent with the characteristics and qualities.</b>
<b>Wendover Two Limited (S222)</b>	S222.039	Natural features and landscapes	NFL-P6	Support in part	The restoration and enhancement of ONLs and ONF should always be encouraged and to do otherwise may hold such areas in a degraded state.	Amend Policy NFL-P6 as follows: Encourage the restoration and enhancement of ONL and ONF <b>areas where it is consistent with the characteristics and qualities.</b>
<b>Matauri Trustee Limited (S243)</b>	S243.054	Natural features and landscapes	NFL-P6	Support in part	The restoration and enhancement of ONLs and ONF should always be encouraged and to do otherwise may hold such areas in a degraded state.	Amend Policy NFL-P6 as follows: Encourage the restoration and enhancement of ONL and ONF



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						<del>areas where it is consistent with the characteristics and qualities.</del>
<b>P S Yates Family Trust (S333)</b>	S333.031	Natural features and landscapes	NFL-P6	Support	The restoration and enhancement of ONLs and ONF should always be encouraged and to do otherwise may hold such areas in a degraded state.	Amend Policy NFL-P6 as follows: Encourage the restoration and enhancement of ONL and ONF <del>areas where it is consistent with the characteristics and qualities.</del>
<b>Michael John Winch (S67)</b>	S67.028	Natural features and landscapes	NFL-P7	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	Retain the policies
<b>Bentzen Farm Limited (S167)</b>	S167.037	Natural features and landscapes	NFL-P7	Oppose	Some loss of 'characteristics and qualities' should be able to be sustained before those values are gone. The classification system used by the NRC uses a ranking within which the value should be able to move along before it is lost. In this context prohibiting 'any loss' is an unreasonable test.	Delete Policy NFL-P7
<b>Setar Thirty Six Limited (S168)</b>	S168.040	Natural features and landscapes	NFL-P7	Oppose	Prohibit land use that would result in any loss of and/or destruction of the characteristics and qualities of ONL and ONF. Some loss of 'characteristics and qualities' should be able to be sustained before those values are gone. The classification system used by the NRC uses a ranking within which the value should be able to move along before it is lost. In this context prohibiting 'any loss' is an unreasonable test.	Delete Policy NFL-P7
<b>The Shooting Box Limited (S187)</b>	S187.032	Natural features and landscapes	NFL-P7	Oppose	Prohibit land use that would result in any loss of and/or destruction of the characteristics and qualities of ONL and ONF.  Some loss of 'characteristics and qualities' should be able to be sustained before those values are gone. The classification system used by the NRC uses a ranking within which the value should be able to move along before it is	Delete Policy NFL-P7

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					lost. In this context prohibiting 'any loss' is an unreasonable test.	
<b>Wendover Two Limited (S222)</b>	S222.040	Natural features and landscapes	NFL-P7	Oppose	Prohibit land use that would result in any loss of and/or destruction of the characteristics and qualities of ONL and ONF. Some loss of 'characteristics and qualities' should be able to be sustained before those values are gone. The classification system used by the NRC uses a ranking within which the value should be able to move along before it is lost. In this context prohibiting 'any loss' is an unreasonable test.	Delete Policy NFL-P7
<b>Matauri Trustee Limited (S243)</b>	S243.055	Natural features and landscapes	NFL-P7	Oppose	Prohibit land use that would result in any loss of and/or destruction of the Characteristics and qualities of ONL and ONF. Some loss of 'characteristics and qualities' should be able to be sustained before those values are gone. The classification system used by the NRC uses a ranking within which the value Should be able to move along before it is lost. In this context prohibiting 'any loss' is an unreasonable test.	Delete Policy NFL-P7
<b>P S Yates Family Trust (S333)</b>	S333.032	Natural features and landscapes	NFL-P7	Oppose	Prohibit land use that would result in any loss of and/or destruction of the characteristics and qualities of ONL and ONF. Some loss of 'characteristics and qualities' should be able to be sustained before those values are gone. The classification system used by the NRC uses a ranking within which the value should be able to move along before it is lost. In this context prohibiting 'any loss' is an unreasonable test.	Delete Policy NFL-P7
<b>Haititaimaran gai Marae Kaitiaki Trust (S394)</b>	S394.038	Natural features and landscapes	NFL-P7	Support in part	Largely support, though note that each characteristic or quality of ONL and ONF should attract protection to ensure protection on the round.	Amend Policy NFL-P7 as follows: Prohibit land use that would result in any loss of and/or destruction of <b>any of</b> the characteristics and or qualities of ONL <del>and or</del> ONF.

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<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.155	Natural features and landscapes	NFL-P7	Support in part	Policies NFL-P2, NFL-P3 and NFL-P7 need to be amended so that they are consistent with the relief sought by Federated Farmers for objectives NFL-O1 and NFL-O2 above. The policies need to focus on avoiding inappropriate subdivision, use and development within the two layers while recognising certain activities can occur as long as they are appropriate for the areas.	Amend Policy NFL-P7 as follows: Prohibit inappropriate land use that would result in <del>any</del> loss of and/or destruction of the characteristics and qualities of ONL and ONF or wording with similar intent
<b>Michael John Winch (S67)</b>	S67.029	Natural features and landscapes	NFL-P8	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	Retain the policies
<b>Bentzen Farm Limited (S167)</b>	S167.038	Natural features and landscapes	NFL-P8	Oppose	This is not a policy but a method of assessment, and therefore more appropriately an assessment criterion. Non complying and discretionary activity applications should be assessed against objectives and policies which should be a clear expression of a desired outcome.	Delete Policy NFL-P8 (inferred)
<b>Setar Thirty Six Limited (S168)</b>	S168.041	Natural features and landscapes	NFL-P8	Oppose	Policy NFL-P8 (inferred) seeks to manage land use and subdivision to Protect ONL and ONF and address the effects of the activity requiring resource consent, including (but not limited to) consideration of a range of matters where relevant to the application: This is not a policy but a method of assessment, and therefore more appropriately an assessment criterion. Non-complying and discretionary activity applications should be assessed against objectives and policies which should be a clear expression of a desired outcome - not a way to achieve an unspecified outcome as is this policy.	Delete Policy NFL-P8 (inferred)
<b>The Shooting Box Limited (S187)</b>	S187.033	Natural features and landscapes	NFL-P8	Oppose	Refer to submission for detailed reasons for decision(s) requested relating, but not limited to, the following: this is not a policy but a method of assessment, and more appropriately an assessment criterion; and non-complying and discretionary activity applications should be assessed against clear objectives and policies.	Delete Policy NFL-P8 (inferred)

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<b>Wendover Two Limited (S222)</b>	S222.041	Natural features and landscapes	NFL-P8	Oppose	Policy NFL-P8 (inferred) seeks to manage land use and subdivision to Protect ONL and ONF and address the effects of the activity requiring resource consent, including (but not limited to) consideration of a range of matters where relevant to the application: This is not a policy but a method of assessment, and therefore more appropriately an assessment criterion. Non complying and discretionary activity applications should be assessed against objectives and policies which should be a clear expression of a desired outcome - not a way to achieve an unspecified outcome as is this policy.	Delete Policy NFL-P8 (inferred)
<b>Matauri Trustee Limited (S243)</b>	S243.056	Natural features and landscapes	NFL-P8	Oppose	Policy NFL-P6 seeks to manage land use and subdivision to Protect ONL and ONF and address the effects of the activity requiring resource consent, including (but not limited to) consideration of a range of matters where relevant to the application: This is not a policy but a method of assessment, and therefore more appropriately an assessment criterion. Non complying and discretionary activity applications should be assessed against objectives and policies which should be a clear expression of a desired outcome - not a way to achieve an unspecified outcome as is this policy.	Delete Policy NFL-P8 (inferred)
<b>P S Yates Family Trust (S333)</b>	S333.033	Natural features and landscapes	NFL-P8	Oppose	Policy NFL-P6 seeks to manage land use and subdivision to Protect ONL and ONF and address the effects of the activity requiring resource consent, including (but not limited to) consideration of a range of matters where relevant to the application: This is not a policy but a method of assessment, and therefore more appropriately an assessment criterion. Non complying and discretionary activity applications should be assessed against objectives and policies	Delete Policy NFL-P8 (inferred)

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					which should be a clear expression of a desired outcome - not a way to achieve an unspecified outcome as is this policy.	
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.071	Natural features and landscapes	NFL-P8	Support	not stated	Retain NFL-P8 as notified
<b>PF Olsen Limited (S91)</b>	S91.016	Natural features and landscapes	Rules	Oppose	<p>There is no justification to require plantation forestry earthworks to comply with more stringent standards for earthworks in the Natural Features and Landscapes overlays, and for those standards to also not equally apply to other primary production land use.</p> <p>Rules in the Natural Features and Landscapes overlays are already in the plan for plantation forestry activities in these overlays. Plantation forestry activities include earthworks.</p> <p>Earthworks are undertaken in the main to provide access and infrastructure. The proposed standards might be applicable to land recontouring activities but not earthworks for plantation forestry.</p> <p>The drafting provides a legal nonsense in that replanting plantation forest is a discretionary activity (under rules NFL-R5 and CE-R6) but is required for the earthworks to be permitted under this standard and rule EW-R7.</p> <p>The earthworks Matters of Discretion go well beyond the scope of the District Council's powers under section 31 of the Resource Management Act.</p>	<p>Amend the rules for plantation forestry activities in the Natural Features and Landscapes overlays limiting to only apply to plantation forestry earthworks. Delete the irrelevant Matters of Discretion for earthworks in Natural Features and Landscapes overlays.</p> <p>Amend the rules to provide consistency of application for primary production activities.</p>
<b>Summit Forests New Zealand Limited (S148)</b>	S148.029	Natural features and landscapes	Rules	Not Stated	<p>The chapter on Outstanding Natural Landscapes (ONL) and Outstanding Natural Features (ONF) fails to provide equitably for all primary production activities. In particular, it fails to recognise that, where plantation forestry already exists within an ONL or ONF, it should be considered as a legitimate part of the landscape and provided for as a permitted activity subject to the provisions of the NES-PF.</p>	Amend rules to provide for existing Plantation Forestry and Plantation Forestry Activities in an ONL and/or ONF as a permitted activity subject to the provisions of the NES-PF

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Bentzen Farm Limited (S167)	S167.041	Natural features and landscapes	Rules	Oppose	<p>There are subdivisions in the district, including in coastal environments, where resource consents have been granted and/or titles issued specifying controls on the location and size of building platforms, and controlling these through legally binding instruments.</p> <p>As drafted in rule NFL-R1, where these occur in the coastal areas, the activity status of dwellings defaults to non-complying, regardless of prior entitlements provided by subdivision.</p> <p>The default to non-complying activity would require a wholesale reassessment of the appropriateness to build on an approved building platform. It imposes considerable unnecessary cost and risk to current owners.</p> <p>Non-notification is also appropriate as the substantive consideration as to whether a building is acceptable on the approved building platform will have occurred already at subdivision stage.</p>	<p>Insert new rule as follows: "<b>New buildings or structures, and extensions or alterations to existing buildings or structures within an approved building platform or buildable area on a site for which a subdivision consent was granted after 1 January 2000</b>"</p> <p>Specify the activity status as <b>controlled activity</b></p> <p>Insert the following matter of control: <b>1. Compliance with location, height, design and mitigation conditions which apply to the site or building platform by way of resource consent condition or consent notice.</b></p> <p>Insert the following clause: <b>Building/s which are a controlled activity under this rule shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</b></p>

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<b>Russell Protection Society (INC) (S179)</b>	S179.078	Natural features and landscapes	Rules	Support	In view of the fact that coastal zones are not provided for in the Proposed district plan, then the Coastal Environment, Natural Character and Natural Features and Landscape Overlays become very important in helping to define the boundaries of Russell and in safeguarding a suitable backdrop or canvass which to interpret and appreciate the historic township. It is especially important that these overlays provide adequate protection to the headlands framing Russell and the natural coastal escarpments that characterize the balance of the Russell Peninsula. For this reason it is important to control subdivision and development of coastal lands in the area.	Retain rules
<b>MLP LLC (S183)</b>	S183.009	Natural features and landscapes	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Landing Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
<b>Wendover Two Limited (S222)</b>	S222.044	Natural features and landscapes	Rules	Oppose	There are subdivisions in the district, including in coastal environments, where resource consents have been granted and/or titles issued specifying controls on the location and size of building platforms, and controlling these through legally binding instruments. Such forms of subdivision were encouraged under the Management Plan rule of the Operative Plan. This form of rule is proposed to be carried over into the Proposed Plan, and so may result in more such forms of subdivision. As drafted in rule NFL-R1, where these occur in the coastal areas, the activity status of dwellings defaults to non-complying, regardless of prior entitlements provided by subdivision. In many cases, the subdivisions have been carefully designed and have detailed controls imposed by way	Insert a new rule as follows: " <b>New buildings or structures, and extensions or alterations to existing buildings or structures within an approved building platform or buildable area on a site for which a subdivision consent was granted after 1 January 2000</b> " Specify the activity status as <b>controlled activity</b> Insert the following matter of control: <b>a. Compliance with location, height, design and</b>

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					<p>of consent condition and consent notices on the titles to manage the effects of buildings. Owners have purchased lots on the understanding that their entitlement to build on them is protected. The default to non-complying activity would require a wholesale reassessment of the appropriateness to build on an approved building platform. It imposes considerable unnecessary cost and risk to current owners.</p> <p>Controlled activity is an appropriate activity class because the Council will have already assessed appropriations in such circumstance and all that may be required will be an evaluation against the conditions of the subdivision consent/consent notices.</p> <p>Typically, such subdivisions have occurred in more recent times and so a cut-off date as proposed in the relief may also be appropriate. Non-notification is also appropriate as the substantive consideration as to whether a building is acceptable on the approved building platform will have occurred already at subdivision stage. A similar provision is in the Operative Whangarei District Plan 2022.</p>	<p><b>mitigation conditions which apply to the site or building platform by way of resource consent condition or consent notice.</b></p> <p>Insert the following clause:<b>Building/s which are a controlled activity under this rule shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</b></p>
<b>Tryphena Trustees Limited, David Haythornwait e (S226)</b>	S226.009	Natural features and landscapes	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
<b>Isles Casey Trustee Services Limited, WWC Trustee Company Limited (S227)</b>	S227.009	Natural features and landscapes	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.



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					the purpose of the Resource Management Act 1991 (RMA).	
<b>Jayesh Govind and Others (S228)</b>	S228.009	Natural features and landscapes	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
<b>Laurie Pearson (S229)</b>	S229.009	Natural features and landscapes	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
<b>Mataka Residents' Association Inc (S230)</b>	S230.009	Natural features and landscapes	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
<b>Ovisnegra Limited (S231)</b>	S231.009	Natural features and landscapes	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
<b>Tobias Groser (S232)</b>	S232.009	Natural features and landscapes	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give

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					functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	effect to this submission, or any other consequential relief required to give effect to this submission.
<b>Whale Bay Limited (S233)</b>	S233.009	Natural features and landscapes	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
<b>Whale Bay Limited (S234)</b>	S234.009	Natural features and landscapes	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
<b>WW Trustee Services 2016 Limited, Eloise Caroline Caswell, Donald Gordon Chandler (S235)</b>	S235.009	Natural features and landscapes	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
<b>Connemara Black Limited (S236)</b>	S236.009	Natural features and landscapes	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.

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<b>Evan Williams and Katherine Williams (S237)</b>	S237.009	Natural features and landscapes	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
<b>John Gowing and Miriam Van Lith (S238)</b>	S238.009	Natural features and landscapes	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
<b>John Gowing, Miriam Van Lith, Ellis Gowing, James Gowing, Byron Gowing (S239)</b>	S239.009	Natural features and landscapes	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
<b>Matthew Watson, Kaylene Watson, D R Thomas Limited (S240)</b>	S240.009	Natural features and landscapes	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
<b>Matthew Draper and Michaela Jannard (S241)</b>	S241.009	Natural features and landscapes	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any

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					and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	other consequential relief required to give effect to this submission.
<b>Matauri Trustee Limited (S243)</b>	S243.059	Natural features and landscapes	Rules	Oppose	<p>There are subdivisions in the district, including in coastal environments, where resource consents have been granted and/or titles issued specifying controls on the location and size of building platforms, and controlling these through legally binding instruments. Such forms of subdivision were encouraged under the Management Plan rule of the Operative Plan. This form of rule is proposed to be carried over into the Proposed Plan, and so may result in more such forms of subdivision.</p> <p>As drafted in rule NFL-R1, where these occur in the coastal areas, the activity status of dwellings defaults to non-complying, regardless of prior entitlements provided by subdivision.</p> <p>In many cases, the subdivisions have been carefully designed and have detailed controls imposed by way of consent condition and consent notices on the titles to manage the effects of buildings. Owners have purchased lots on the understanding that their entitlement to build on them is protected.</p> <p>The default to non-complying activity would require a wholesale reassessment of the appropriateness to build on an approved building platform. It imposes considerable unnecessary cost and risk to current owners.</p> <p>Controlled activity is an appropriate activity class because the Council will have already assessed appropriations in such circumstance and all that may be required will be an evaluation against the conditions of the subdivision consent/consent notices.</p> <p>Typically, such subdivisions have occurred in more recent times and so a cut-off date as proposed in the relief may also be appropriate. Non-notification is also appropriate as the substantive consideration as to whether a building is acceptable on the approved building</p>	<p>Insert new rule as follows:<b>New buildings or structures, and extensions or alterations to existing buildings or structures within an approved building platform or buildable area on a site for which a subdivision consent was granted after 1 January 2000</b></p> <p>Specify the activity status as controlled activity</p> <p>Include the following matter of control:<b>1. Compliance with location, height, design and mitigation conditions which apply to the site or building platform by way of resource consent condition or consent notice.</b></p> <p>Include the following clause:<b>Building/s which are a controlled activity under this rule shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under</b></p>

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					platform will have occurred already at subdivision stage.	<b>section 95B(2) and (3).</b>
<b>Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd (S344)</b>	S344.044	Natural features and landscapes	Rules	Not Stated	<p>The submitter has identified that the overlay chapters are inconsistent with respect to referencing rules for "activities not otherwise listed". The How the Plan Works chapter includes a statement that some overlays will automatically default to a permitted activity. Noting that 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). This lack of consistency will cause confusion for plan users:</p> <ol style="list-style-type: none"> <li>1. The overlay chapters do not include notes to this effect.</li> <li>2. Each overlay chapter has a different approach activity status default rules.</li> <li>3. Overlays and zone chapters use different terminology.</li> </ol> <p>Applying an automatic permitted activity default could lead to 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>Nicole Way and Christopher Huljich as Trustees of the Trssh Birnie Settlement Trust (S345)</b>	S345.011	Natural features and landscapes	Rules	Oppose	<p>The Resource Consents at Mataka Station enable development, and completion of the Mataka Station development, notwithstanding the provisions of the Proposed District Plan. The Proposed District Plan fails to recognise, have regard to, or provide for the development and subdivision enabled by the Resource Consents.</p> <p>The Proposed District Plan provisions will restrict development of the Property, and Mataka Station more generally, in a manner that is inconsistent with the Resource Consents and the integrated and comprehensive development authorised by those. The Council's s32 analysis does not mention, or consider approved but unimplemented developments within the Property and Mataka Station more generally, nor elsewhere. The "low intensity" development controls and height limits proposed within the Coastal Environment are given very little</p>	<p>Amend to explicitly, and specifically provide for, and preserve the activities and land uses authorised under the Resource Consents at Mataka Station.</p> <p>and/or</p> <p>Insert a new special purpose zone and/or structure plan together with appropriate provisions (objectives, policies and rules) enabling the residential activity and development as is authorised by the Resource Consents as a permitted activity (where they are in general accordance with the Resource Consents) as well as appropriate activities within the Rural Production Zone, regardless of the provisions of the CE, ONL</p>

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					analysis. The proposed provisions are inconsistent with the Act and relevant planning instruments.	or HNC. and/or Amend the provisions of the Proposed District Plan to preserve the activities and buildings authorised by the Resource Consents on the Property.
<b>Philibert Jean-G Frick (S352)</b>	S352.009	Natural features and landscapes	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
<b>Northland Regional Council (S359)</b>	S359.032	Natural features and landscapes	Rules	Support in part	There is potential for unintended consequences of the rules applying to Outstanding Natural Landscapes and Features as new fencing requires resource consent.	Amend the rules to expand the permitted activity rule to allow for fencing within natural character areas, ONLs and ONFs where fencing is required for protection or enhancement of soil conservation treatments, water bodies and wetlands and in line with the Stock Exclusion Regulations and/or regional plan rules.
<b>Foodstuffs North Island Limited (S363)</b>	S363.036	Natural features and landscapes	Rules	Not Stated	The submitter has identified that the overlay chapters are inconsistent with respect to referencing rules for "activities not otherwise listed". The How the Plan Works chapter includes a statement that some overlays will automatically default to a permitted activity. Noting that 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). This lack of consistency will cause confusion for plan users:	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>1. The overlay chapters do not include notes to this effect.</p> <p>2. Each overlay chapter has a different approach activity status default rules.</p> <p>3. Overlays and zone chapters use different terminology.</p> <p>Applying an automatic permitted activity default could lead to unintentional consequences.</p>	
<b>Maurice Dabbah (S422)</b>	S422.009	Natural features and landscapes	Rules	Support	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents'] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend any other provisions including alternative activity status, rules, matters for discretionary and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
<b>Bernard Sabrier (S423)</b>	S423.009	Natural features and landscapes	Rules	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents'] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend any other provisions including alternative activity status, rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
<b>Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)</b>	S425.035	Natural features and landscapes	Rules	Support in part	PHTTCCT consider that the provisions do not adequately provide for the maintenance, operation and upgrade of regionally significant infrastructure in accordance with the RPS.	Amend the provisions of NFL to ensure that maintenance, operation, and upgrade of regionally significant infrastructure is provided for.
<b>Francois Dotta (S434)</b>	S434.009	Natural features and landscapes	Rules	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents'] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend any other provisions including alternative activity status, rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
<b>Elka Gouzer (S435)</b>	S435.009	Natural features and landscapes	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give

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					functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	effect to this submission, or any other consequential relief required to give effect to this submission.
<b>Kapiro Conservation Trust (S442)</b>	S442.102	Natural features and landscapes	Rules	Oppose	Forest & Bird does not support the rule for extending mineral extraction activities in ONL's and ONFs. The extension of such existing activities would more appropriately be non-complying in ONL's and prohibited in ONFs. This is because while ONLs may be able to absorb some further modification from quarrying activities the same can not be said for ONFs. New quarrying activities should be prohibited for both ONLs and ONFs as should new plantation forestry.	Insert new rule: "Extension to Mineral Extraction activity in ONL Activity Status: Non-Complying"
<b>Kapiro Conservation Trust (S442)</b>	S442.103	Natural features and landscapes	Rules	Neutral	Forest & Bird does not support the rule for extending mineral extraction activities in ONL's and ONFs. The extension of such existing activities would more appropriately be non-complying in ONL's and prohibited in ONFs. This is because while ONLs may be able to absorb some further modification from quarrying activities the same can not be said for ONFs. New quarrying activities should be prohibited for both ONLs and ONFs as should new plantation forestry.	Insert new rule: "Extension to Mineral Extraction activity in ONF Activity Status: Prohibited"
<b>Top Energy Limited (S483)</b>	S483.160	Natural features and landscapes	Rules	Not Stated	Top Energy seeks inclusion as a permitted activity for upgrades to existing electricity infrastructure that cannot comply with NFL - R1 PER (3) relating to 20% GFA and PER 4 relating to NFL-31 maximum height. Given that these network utilities are already present on the landscape, Top Energy seeks to ensure that they can be appropriately upgraded to meet the demands of technology, and ensure continued resilient, flexible and adaptable supply throughout the District. Top Energy also notes, that given the interdependencies of Top Energy's networks, some of the lower voltage lines within these rural coastal communities meet the criteria of	Insert a new rule as follows (or to the same effect): <b>NFL-RX Upgrade of electricity network utilitiesActivity Status: PermittedWhere:PER - 1The upgrade of electricity network utility structures or buildings:1. is within 5m of the existing alignment location of the original structure or building;2.does not increase the gross floor</b>



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					Regionally Significant Infrastructure. Top Energy considers that the amendments sought result in better alignment with RPS policies (5.2.2 and 5.3.2 in particular).	<b>area by more than 30 percent in a 10-year period if it is a building;3.complies with the zones permitted setback standards if it is a building;4.does not result in pole or tower height that exceeds 25m above ground level;5.does not result in more than two additional poles;6.does not result in additional towers; and7.any additional cross arms do not exceed a length of more than 4m.</b>
<b>Owen Burn (S490)</b>	S490.004	Natural features and landscapes	Rules	Oppose	The standards proposed for activities within the overlays applying to the site at Orokawa Bay would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act. Further, the submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include imitations on the height, colour and reflectivity of buildings.	Delete all rules in the plan that require activities located within an identified Outstanding Natural Landscape to be assessed as non-complying activities
<b>Eric Kloet (S491)</b>	S491.004	Natural features and landscapes	Rules	Oppose	The standards proposed for activities within the overlays applying to the site at Waipohutukawa Bay (Lots 5 and 18 of DP 391213) would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act. Further, the submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These	Delete all rules in the plan that require activities located within an identified Outstanding Natural Landscape to be assessed as non-complying activities

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					include imitations on the height, colour and reflectivity of buildings.	
<b>Ironwood Trust Limited (S492)</b>	S492.004	Natural features and landscapes	Rules	Oppose	The standards proposed for activities within the overlays applying to the site at Jack's Bay and Waipiro Bay would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act. Further, the submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include the identification of farming and forestry as discretionary activities, setbacks from MHWS and imitations on the height and colour of buildings.	Delete all rules in the plan that require activities located within an identified Outstanding Natural Landscape to be assessed as non-complying activities
<b>William Goodfellow (S493)</b>	S493.006	Natural features and landscapes	Rules	Oppose	As a corollary to the above, the submitter considers that the proposed standards that apply to activities located within the overlays identified above would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act.	Amend all provision in the plan that require activities located within an identified Outstanding Natural Landscape to be assessed as non-complying activities be deleted.
<b>Ian Jepson (S494)</b>	S494.006	Natural features and landscapes	Rules	Oppose	As a corollary to the above, the submitter considers that the proposed standards that apply to activities located within the overlays identified above would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act.	Amend all provision in the plan that require activities located within an identified Outstanding Natural Landscape to be assessed as non-complying activities be deleted.
<b>Philip Thornton (S496)</b>	S496.005	Natural features and landscapes	Rules	Oppose	As a corollary to the above, the submitter considers that the proposed standards that apply to activities located within the overlays identified above would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act.	Amend all provisions in the plan that require activities located within an identified ONL to be assessed as non-complying activities be deleted.
<b>Mark John Wyborn (S497)</b>	S497.005	Natural features and landscapes	Rules	Support in part	The imposition of controls intended to manage development in highly sensitive landscapes are inappropriate in this context and will make the reasonable use and development of the property unfairly and unnecessarily constrained.	Amend all provisions in the plan that require activities located within an identified ONL to be assessed as non-complying activities be deleted.

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<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.083	Natural features and landscapes	Rules	Not Stated	Forest & Bird does not support the rule for extending mineral extraction activities in ONL's and ONFs. The extension of such existing activities would more appropriately be non-complying in ONL's and prohibited in ONFs. This is because while ONLs may be able to absorb some further modification from quarrying activities the same can not be said for ONFs. New quarrying activities should be prohibited for both ONLs and ONFs as should new plantation forestry.	Insert a new rule Extension to Mineral Extraction activity in ONL Activity Status: non-complying
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.084	Natural features and landscapes	Rules	Not Stated	Forest & Bird does not support the rule for extending mineral extraction activities in ONL's and ONFs. The extension of such existing activities would more appropriately be non-complying in ONL's and prohibited in ONFs. This is because while ONLs may be able to absorb some further modification from quarrying activities the same can not be said for ONFs. New quarrying activities should be prohibited for both ONLs and ONFs as should new plantation forestry.	Insert New Rule "Extension to Mineral Extraction activity in ONF Activity Status: prohibited"
<b>Ngā Tai Ora - Public Health Northland (S516)</b>	S516.084	Natural features and landscapes	Rules	Not Stated	The submitter has identified that the overlay chapters are inconsistent with respect to referencing rules for "activities not otherwise listed". The How the Plan Works chapter includes a statement that some overlays will automatically default to a permitted activity. Noting that 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). This lack of consistency will cause confusion for plan users: 1. The overlay chapters do not include notes to this effect. 2. Each overlay chapter has a different approach activity status default rules. 3. Overlays and zone chapters use different terminology. Applying an automatic permitted activity default could lead to unintentional consequences.	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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<b>Kapiro Conservation Trust (S442)</b>	S442.099	Natural features and landscapes	Notes	Support	For some reason Note 3 only refers to the Earthworks chapter. When Rule NFL-R3 applies to both Earthworks and indigenous vegetation clearance. This note should also relate to the Ecosystems and Indigenous Biodiversity Chapter There may be further significant indigenous biodiversity beyond the areas identified as SNA in the overlays where preservation and protection is required in accordance with the RPS. As well there may be other vegetation that requires protection in alignment with the RPS, policy 4.4.1.	Amend notes: The Earthworks <b>and Ecosystems and Indigenous Biodiversity</b> Chapter rules apply in addition to the earthwork and indigenous vegetation clearance rules in this overlay chapter, not instead of. In the event of a conflict between the earthworks <b>and ecosystems and indigenous biodiversity chapters</b> earthworks <b>indigenous vegetation rules</b> , the most stringent rule will apply.
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.080	Natural features and landscapes	Notes	Support in part	For some reason Note 3 only refers to the Earthworks chapter. When Rule NFL-R3 applies to both Earthworks and indigenous vegetation clearance. This note should also relate to the Ecosystems and Indigenous Biodiversity Chapter There may be further significant indigenous biodiversity beyond the areas identified as SNA in the overlays where preservation and protection is required in accordance with the RPS. As well there may be other vegetation that requires protection in alignment with the RPS, policy 4.4.1.	Amend notes The Earthworks <b>and Ecosystems and Indigenous Biodiversity</b> Chapter rules apply in addition to the earthwork and indigenous vegetation clearance rules in this overlay chapter, not instead of. In the event of a conflict between the earthworks <b>and ecosystems and indigenous biodiversity chapters</b> earthworks <b>indigenous vegetation rules</b> , the most stringent rule will apply.

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David King (S46)	S46.002	Natural features and landscapes	NFL-R1	Oppose	The submitter considers that NFL-R1/Per-2, as it applies to new buildings or structures within a coastal environment, is too prohibitive. The submitter considers that it should be a person's right to build a residential unit along with any required ancillary structure on land to which they have guaranteed title to and that the Local Authority (FNDC) sees fit to levy payable rates on that land. And, that any required earthworks to achieve that activity should also be included as being permitted.	Amend NFL-R1/Per-2 to include residential units within a coastal environment and to also permit earthworks related to that activity.
Michael John Winch (S67)	S67.007	Natural features and landscapes	NFL-R1	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	retain the rules
Horticulture New Zealand (S159)	S159.061	Natural features and landscapes	NFL-R1	Oppose	The policy only provides for buildings and structures in very limited circumstances. Given the extent of Outstanding Natural Features and Outstanding Natural Landscapes in the Far North this is very limiting.	Amend subsection 2 of PER-1 of Rule NFL-R1 as follows: (2) no greater than <del>25m<sup>2</sup></del> <b>100m<sup>2</sup></b>
Bentzen Farm Limited (S167)	S167.040	Natural features and landscapes	NFL-R1	Oppose	The building per-se, rather than the use of the building, is the matter that should be controlled. As such the requirement for the building to be ancillary to farming should be deleted. Residential Units should be provided for in the overlay, in accordance with the underlying zone. The rule fails to recognise the existence of residential units in ONLs and the benefits that subdivision, use and development associated with residential units can bring to ONFs and ONLs. The rule ignores that there are titles, including titles with approved building platforms, which have occurred through a subdivision process which has confirmed the suitability of a residential unit, but are as yet unbuilt on. That should be recognised as a matter of discretion, or in the preferred alternative added as a controlled activity as also sought by this submission.	Amend Rule NFL-R1 as follows:  Activity status: Permitted Where: PER-1 If a new building or structure is located outside the coastal environment it is: <del>1. ancillary to farming (excluding a residential unit);</del> <b>1. 2. no greater than 25 50m<sup>2</sup> .</b> PER-2 If a new building or structure is located within the coastal environment it is: <del>1. ancillary to farming (excluding a residential unit);</del>

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					<p>Non-conformity with the rule is more effectively and efficiently dealt with as a restricted discretionary activity. This is because the matters of discretion are capable of being confined to effects on the identified characteristics and values of the feature. Except for more than one dwelling per lot, notification should not be a consideration.</p>	<p><del>12-</del> no greater than <del>25</del> <b>50</b>m<sup>2</sup>.            PER-3            Any extension to a lawfully established building or structure is no greater than 20% of the GFA of the existing lawfully established building or structure.            PER-4            The building or structure, or extension or alteration to an existing building or structure, complies with standards:            NFL-S1 Maximum height            NFL-S2 Colours and materials            Insert the following rule:<b>PER-5</b>  <b>Where the new building is for a residential unit, there is only one residential unit within the ONL and ONF area on the lot.</b>            Amend the activity status where compliance is not achieved with rules PER-1, PER-2, PER-3 and PER-4 from discretionary /non complying to <b>restricted discretionary</b> in the case of each rule.            Insert a new activity status where compliance is not achieved with rule PER-5 as a <b>non-complying activity</b>.            Insert a matter of discretion as</p>

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						<p>follows:</p> <p><b>1. The effects on the identified characteristics and values that established the landscape or feature, having regard to:</b>a. the temporary or permanent nature of any adverse effects;b. the location, scale and design of any proposed development;c. any means of Integrating the building, structure or activity;d. the ability of the environment to absorb change;e. the need for and location of earthworks or vegetation clearance;f. the operational or functional need of any regionally significant infrastructure to be sited in the particular location;g. Except as provided for under m and n below, any viable alternative locations for the activity or development outside the landscape or feature;h. the characteristics and qualities of the landscape or feature;i. the physical and visual integrity of the landscape or feature;j. the natural landform and processes of</p>

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						<p><b>the location; andk. any positive contribution the development has on the characteristics and qualities.l. Whether locating the activity within the ONF or ONL area is required to enable reasonable residential or farming use of the lot. m. Whether the location is on a previously approved building platform.</b></p> <p>Insert new clause as follows:<b>Building/s which do not comply with PER1, PER2, PER3 or PER4 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</b></p>
<p><b>Setar Thirty Six Limited (S168)</b></p>	<p>S168.043</p>	<p>Natural features and landscapes</p>	<p>NFL-R1</p>	<p>Oppose</p>	<p>The building per -se, rather than the use of the building, is the matter that should be controlled in this instance, having regard to the purpose of the rule. As such the requirement for the building to be ancillary to farming should be deleted. Reliance is still able to be placed on the other controls and standards referred to in the rule to manage effects on natural features and landscapes. Residential Units should be provided for in the</p>	<p>Amend Rule NFL-R1 as follows: Activity status: Permitted Where: PER-1 If a new building or structure is located outside the coastal environment it is: 1. <del>ancillary to farming (excluding a residential unit);</del></p>



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					<p>overlay, in accordance with the underlying zone. They otherwise default to non-complying in the coastal environment as this rule is drafted in the Proposed Plan. This fails to recognise the existence of residential units in ONLs and the benefits that subdivision, use and development associated with residential units can bring to ONFs and ONLs.</p> <p>Should the concern be the proliferation of residential dwellings in the coastal environment, then this can be managed by the inclusion of a rule limiting as a per the drafting proposed at PER-5.</p> <p>As drafted, the rule ignores that there are titles, including titles with approved building platforms, which have occurred through a subdivision process which has confirmed the suitability of a residential unit, but are as yet unbuilt on. That should be recognised as a matter of discretion, or in the preferred alternative added as a controlled activity as also sought by this submission.</p> <p>50m<sup>2</sup>, rather than 25m<sup>2</sup>, better provides for small farm sheds that are typical in rural environments. Non-conformity with the rule is more effectively and efficiently dealt with as a restricted discretionary activity. This is because the matters of discretion are capable of being confined to effects on the identified characteristics and values of the feature. Except for more than one dwelling per lot, notification should not be a consideration, as the restricted discretionary matters are limited in their scope and need not involve third party input</p>	<p>1.2. no greater than <del>25</del> 50m<sup>2</sup> . PER-2 If a new building or structure is located within the coastal environment it is: <del>1- ancillary to farming (excluding a residential unit);</del> 12- no greater than <del>25</del> 50m<sup>2</sup>. PER-3 ... PER-4 ... Insert the following rule: <b>PER-5 Where the new building is for a residential unit, there is only one residential unit within the ONL and ONF area on the lot.</b> Amend the activity status where compliance is not achieved with rules PER-1, PER-2, PER-3 and PER-4 from discretionary/non-complying to restricted discretionary in the case of each rule. Insert a new activity status where compliance is not achieved with rule PER-5 as a non-complying activity. Insert a matter of discretion as follows: <b>1. The effects on the identified characteristics and values that established the landscape or feature, having regard to:</b> <b>a. the temporary or</b></p>

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						<p>permanent nature of any adverse effects;b. the location, scale and design of any proposed development;c. any means of Integrating the building, structure or activity;d. the ability of the environment to absorb change;e. the need for and location of earthworks or vegetation clearance;f. the operational or functional need of any regionally significant infrastructure to be sited in the particular location;g. Except as provided for under m and n below, any viable alternative locations for the activity or development outside the landscape or feature;h. the characteristics and qualities of the landscape or feature;i. the physical and visual integrity of the landscape or feature;j. the natural landform and processes of the location; andk. any positive contribution the development has on the characteristics and qualities.l. Whether locating the activity within the ONF or ONL area is</p>

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						<p><b>required to enable reasonable residential or farming use of the lot.m. Whether the location is on a previously approved building platform.</b></p> <p>Insert a new clause as follows:<b>Building/s which do not comply with PER-1, PER-2, PER-3 or PER-4 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</b></p>
<p><b>The Shooting Box Limited (S187)</b></p>	<p>S187.035</p>	<p>Natural features and landscapes</p>	<p>NFL-R1</p>	<p>Oppose</p>	<p>Refer to submission for detailed reasons for decision(s) requested relating, but not limited to, the following: the building per-se, rather than the use of the building, is the matter that should be controlled; the failure to recognise the existence of residential units in ONLs and the benefits.; inclusion of limitation of dwellings as per drafting proposed at PER-5; the rules ignores that there are titles, including titles with approved building platforms; 50m2, rather than 25m2, better provides for small farm sheds; non-conformity with the rule is more effectively and efficiently dealt with as a restricted discretionary activity; and except for more than one dwelling per lot, notification should not be a consideration.</p>	<p>Amend Rule NFL-R1 as follows: Activity status: Permitted Where: PER-1 If a new building or structure is located outside the coastal environment it is:<del>1. ancillary to farming (excluding a residential unit)</del> 1. 2. no greater than <del>25</del> <b>50m2</b> . PER-2 If a new building or structure is located within the coastal</p>

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						<p>environment it is: <del>1. ancillary to farming (excluding a residential unit)</del> 1 2. no greater than <del>25</del> 50m<sup>2</sup>.</p> <p>PER-3 Any extension to a lawfully established building or structure is no greater than 20% of the GFA of the existing lawfully established building or structure.</p> <p>PER-4 The building or structure, or extension or alteration to an existing building or structure, complies with standards: NFL-S1 Maximum height NFL-S2 Colours and materials Add the following rule:<b>PER-5</b> <b>Where the new building is for a residential unit, there is only one residential unit within the ONL and ONF area on the lot.</b></p> <p>Amend the activity status where compliance is not achieved with rules PER-1, PER-2, PER-3 and PER-4 from discretionary /non complying to <b>restricted discretionary</b> in the case of each rule. Add a new activity status where compliance is not</p>

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						<p>achieved with rule PER-5 as a <b>non-complying activity</b>.                      Add a matter of discretion as follows:                      1. The effects on the identified characteristics and values that established the landscape or feature, having regard to:                      a. the temporary or permanent nature of any adverse effects                      b. the location, scale and design of any proposed development                      c. any means of Integrating the building, structure or activity                      d. the ability of the environment to absorb change                      e. the need for and location of earthworks or vegetation clearance                      f. the operational or functional need of any regionally significant infrastructure to be sited in the particular location                      g. Except as provided for under m and n below, any viable alternative locations for the activity or development outside the landscape or feature                      h. the characteristics and</p>

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						<p>qualities of the landscape or feature</p> <p>i. the physical and visual integrity of the landscape or feature.</p> <p>j. the natural landform and processes of the location; and</p> <p>k. any positive contribution the development has on the characteristics and qualities;</p> <p>l. Whether locating the activity within the ONF or ONL area is required to enable reasonable residential or farming use of the lot.</p> <p>m. Whether the location is on a previously approved building platform.</p>
<p><b>Wendover Two Limited (S222)</b></p>	<p>S222.043</p>	<p>Natural features and landscapes</p>	<p>NFL-R1</p>	<p>Oppose</p>	<p>The building per se, rather than the use of the building, is the matter that should be controlled in this instance, having regard to the purpose of the rule. As such the requirement for the building to be ancillary to farming should be deleted. Reliance is still able to be placed on the other controls and standards referred to in the rule to manage effects on natural features and landscapes. Residential Units should be provided for in the overlay, in accordance with the underlying zone. They otherwise default to non-complying in the coastal environment as this rule is drafted in the Proposed Plan. This fails to recognise the existence of residential units in ONLs and the benefits that subdivision, use and development associated with residential units can bring to ONFs and ONLs. Should the concern be the proliferation of residential</p>	<p>Amend Rule NFL-R1 as follows: Activity status: Permitted Where: PER-1 If a new building or structure is located outside the coastal environment it is:<del>1. ancillary to farming (excluding a residential unit);</del><b>1. 2. no greater than 25-50m2 .</b> PER-2 If a new building or structure is located within the coastal environment it is:<del>1. ancillary to farming (excluding a</del></p>

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					<p>dwelling in the coastal environment, then this can be managed by the inclusion of a rule limiting as a per the drafting proposed at PER-5. As drafted, the rule ignores that there are titles, including titles with approved building platforms, which have occurred through a subdivision process which has confirmed the suitability of a residential unit, but are as yet unbuilt on. That should be recognised as a matter of discretion, or in the preferred alternative added as a controlled activity as also sought by this submission. 50m2, rather than 25m2, better provides for small farm sheds that are typical in rural environments. Non-conformity with the rule is more effectively and efficiently dealt with as a restricted discretionary activity. This is because the matters of discretion are capable of being confined to effects on the identified characteristics and values of the feature. Except for more than one dwelling per lot, notification should not be a consideration, as the restricted discretionary matters are limited in their scope and need not involve third party input.</p>	<p><del>residential unit</del>; <b>1. 2-</b> no greater than <del>25</del> <b>50</b>m<sup>2</sup>.            PER-3            Any extension to a lawfully established building or structure is no greater than 20% of the GFA of the existing lawfully established building or structure.            PER-4            The building or structure, or extension or alteration to an existing building or structure, complies with standards:            NFL-S1 Maximum height            NFL-S2 Colours and materials  <b>PER-5 Where the new building is for a residential unit, there is only one residential unit within the ONL and ONF area on the lot.</b> Amend the activity status where compliance is not achieved with rules PER-1, PER-2, PER-3 and PER-4 from <del>discretionary / non-complying</del> to <b>restricted discretionary</b> in the case of each rule.            Insert a new activity status where compliance is not achieved with rule PER-5 as a <b>non-complying activity</b>.            Insert matter of discretion as</p>

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						<p>follows:1. The effects on the identified characteristics and values that established the landscape or feature, having regard to:a. the temporary or permanent nature of any adverse effects;b. the location, scale and design of any proposed development;c. any means of Integrating the building, structure or activity;d. the ability of the environment to absorb change;e. the need for and location of earthworks or vegetation clearance;f. the operational or functional need of any regionally significant infrastructure to be sited in the particular location;g. Except as provided for under m and n below, any viable alternative locations for the activity or development outside the landscape or feature;h. the characteristics and qualities of the landscape or feature;i. the physical and visual integrity of the landscape or feature;j. the natural landform and processes of the location; andk. any</p>



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						<p><b>positive contribution the development has on the characteristics and qualities.l. Whether locating the activity within the ONF or ONL area is required to enable reasonable residential or farming use of the lot.m. Whether the location is on a previously approved building platform.Insert a new clause as follows:</b></p> <p><b>Building/s which do not comply with PER1, PER2, PER3 or PER4 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</b></p>
<p><b>Matauri Trustee Limited (S243)</b></p>	<p>S243.058</p>	<p>Natural features and landscapes</p>	<p>NFL-R1</p>	<p>Oppose</p>	<p>The building per -se, rather than the use of the building, is the matter that should be controlled in this instance, having regard to the purpose of the rule. As such the requirement for the building to be ancillary to farming should be deleted. Reliance is still able to be placed on the other controls and standards referred to in the rule to manage effects on natural features and landscapes. Residential Units should be provided for in the overlay, in accordance with the underlying zone.</p>	<p>Amend Rule NFL-R1 as follows: Activity status: Permitted Where: PER-1 If a new building or structure is located outside the coastal environment it is: 1. <del>ancillary to farming (excluding a residential unit);</del> 1. 2. no greater than <del>25</del> 50m<sup>2</sup> .</p>

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					<p>They otherwise default to non-complying in the coastal environment as this rule is drafted in the Proposed Plan. This fails to recognise the existence of residential units in ONLs and the benefits that subdivision, use and development associated with residential units can bring to ONFs and ONLs.</p> <p>Should the concern be the proliferation of residential dwellings in the coastal environment, then this can be managed by the inclusion of a rule limiting as a per the drafting proposed at PER-5.</p> <p>As drafted, the rule ignores that there are titles, including titles with approved building platforms, which have occurred through a subdivision process which has confirmed the suitability of a residential unit, but are as yet unbuilt on. That should be recognised as a matter of discretion, or in the preferred alternative added as a controlled activity as also sought by this submission.</p> <p>50m<sup>2</sup>, rather than 25m<sup>2</sup>, better provides for small farm sheds that are typical in rural environments. Non-conformity with the rule is more effectively and efficiently dealt with as a restricted discretionary activity. This is because the matters of discretion are capable of being confined to effects on the identified characteristics and values of the feature.</p> <p>Except for more than one dwelling per lot, notification should not be a consideration, as the restricted discretionary matters are limited in their scope and need not involve third party input</p>	<p>PER-2 If a new building or structure is located within the coastal environment it is: <del>1. ancillary to farming (excluding a residential unit);</del> 1 2. no greater than 25 50m<sup>2</sup>.</p> <p>PER-3 Any extension to a lawfully established building or structure is no greater than 20% of the GFA of the existing lawfully established building or structure.</p> <p>PER-4 The building or structure, or extension or alteration to an existing building or structure, complies with standards: NFL-S1 Maximum height NFL-S2 Colours and materials Add the following rule: <b>PER-5 Where the new building is for a residential unit, there is only one residential unit within the ONL and ONF area on the lot.</b></p> <p>Amend the activity status where compliance is not achieved with rules PER-1, PER-2, PER-3 and PER-4 from discretionary /non complying to restricted discretionary in</p>

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						<p>the case of each rule.</p> <p>Add a new activity status where compliance is not achieved with rule PER-5 as a non-complying activity.</p> <p>Add matters of discretion as follows:<b>1. The effects on the identified characteristics and values that established the landscape or feature, having regard to:</b>a. the temporary or permanent nature of any adverse effects;<b>b. the location, scale and design of any proposed development;</b>c. any means of Integrating the building, structure or activity;<b>d. the ability of the environment to absorb change;</b>e. the need for and location of earthworks or vegetation clearance;<b>f. the operational or functional need of any regionally significant infrastructure to be sited in the particular location;</b>g. Except as provided for under m and n below, any viable alternative locations for the activity or development outside the landscape or feature;<b>h. the characteristics and qualities</b></p>

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						<p>of the landscape or feature;i. the physical and visual integrity of the landscape or feature;j. the natural landform and processes of the location; andk. any positive contribution the development has on the characteristics and qualities.l. Whether locating the activity within the ONF or ONL area is required to enable reasonable residential or farming use of the lot.m. Whether the location is on a previously approved building platform.</p> <p>Add new clause as follows:Building/s which do not comply with PER1, PER2, PER3 or PER4 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</p>
<p><b>Alec Jack (S277)</b></p>	<p>S277.016</p>	<p>Natural features and landscapes</p>	<p>NFL-R1</p>	<p>Oppose</p>	<p>Approximately 270ha of our farm falls into the Outstanding Natural Feature overlay. I support the permission to establish new buildings</p>	<p>Amend rule NFL-R1 as following: 'PER-1 If a new building or structure is located outside the</p>

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					ancillary to farming but oppose the exclusion of residential unit and the restriction to 25m <sup>2</sup> . As we transition from ruminant farming to intensive horticulture we will need more buildings and dwellings - to reduce carbon emissions and prosper.	coastal environment it is: 1. ancillary to farming ( <del>excluding a residential unit</del> ); 2. <del>no greater than 25m<sup>2</sup></del> .
<b>P S Yates Family Trust (S333)</b>	S333.035	Natural features and landscapes	NFL-R1	Oppose	<p>The building per -se, rather than the use of the building, is the matter that should be controlled in this instance, having regard to the purpose of the rule. As such the requirement for the building to be ancillary to farming should be deleted. Reliance is still able to be placed on the other controls and standards referred to in the rule to manage effects on natural features and landscapes.</p> <p>Residential Units should be provided for in the overlay, in accordance with the underlying zone. They otherwise default to non-complying in the coastal environment as this rule is drafted in the Proposed Plan. This fails to recognise the existence of residential units in ONLs and the benefits that subdivision, use and development associated with residential units can bring to ONFs and ONLs. Should the concern be the proliferation of residential dwellings in the coastal environment, then this can be managed by the inclusion of a rule limiting as a per the drafting proposed at PER-5.</p> <p>As drafted, the rule ignores that there are titles, including titles with approved building platforms, which have occurred through a subdivision process which has confirmed the suitability of a</p>	<p><i>Amend Rule NFL-R1 as follows:Activity status: Permitted</i></p> <p><i>Where: PER-1 If a new building orstructure is located outside the coastal environment it is:1. ancillary to farming(excluding a residential unit); 1. 2. no greater than 2550m<sup>2</sup> . PER-2 If a new building orstructure is located within the coastal environment it is: 1. ancillary to farming(excluding a residential unit); 1 2. no greater than 2550m<sup>2</sup>. PER-3 Any extension to a lawfullyestablished building or structure is no greater than20% of the GFA of the existing lawfullyestablished building or structure.PER-4 The building or structure,or extension or alteration to an existing building or structure, complies withstandards: NFL-S1Maximum height NFL-S2 Colours and materials</i></p> <p><i>Insert the following rule: PER-</i></p>

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					<p>residential unit, but are as yet unbuilt on. That should be recognised as a matter of discretion, or in the preferred alternative added as a controlled activity as also sought by this submission. 50m<sup>2</sup>, rather than 25m<sup>2</sup>, better provides for small farm sheds that are typical in rural environments. Non-conformity with the rule is more effectively and efficiently dealt with as a restricted discretionary activity. This is because the matters of discretion are capable of being confined to effects on the identified characteristics and values of the feature. Except for more than one dwelling per lot, notification should not be a consideration, as the restricted discretionary matters are limited in their scope and need not involve third party input.</p>	<p><b>5 Where the new building is for a residential unit, there is only one residential unit within the ONL and ONF area on the lot.</b></p> <p>Amend the activity status where compliance is not achieved with rules PER-1, PER-2, PER-3 and PER-4 from discretionary /non complying to restricted discretionary in the case of each rule.</p> <p>Insert a new activity status where compliance is not achieved with rule PER-5 as a non-complying activity.</p> <p>Insert matters of discretion as follows: <i>1. The effects on the identified characteristics and values that established the landscape or feature, having regard to: a. the temporary or permanent nature of any adverse effects; b. the location, scale and design of any proposed development; c. any means of integrating the building, structure or activity; d. the ability of the environment to absorb change; e. the need for and location of earthworks or vegetation clearance; f. the</i></p>

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						<p><i>operational or functional need of any regionally significant infrastructure to be sited in the particular location; g. Except as provided for under m and n below, any viable alternative locations for the activity or development outside the landscape or feature; h. the characteristics and qualities of the landscape or feature; i. the physical and visual integrity of the landscape or feature; j. the natural landform and processes of the location; and k. any positive contribution the development has on the characteristics and qualities. l. Whether locating the activity within the ONF or ONL area is required to enable reasonable residential or farming use of the lot. m. Whether the location is on a previously approved building platform.</i></p> <p>Insert new clause as follows:  <i>Building/s which do not comply with PER1, PER2, PER3 or PER4 shall be assessed without public or limited notification under sections 95A and 95B of</i></p>

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						<i>the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</i>
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.156	Natural features and landscapes	NFL-R1	Support in part	<p>Federated Farmers supports the recognition in rule NFL-R1 of the functional need for ancillary to farming structures to be in place. The workability of the 25m<sup>2</sup> maximum area in performance standard PER-1 means that almost every ancillary farming structure / building will require a consent under discretionary which is not appropriate.</p> <p>The 25m<sup>2</sup> maximum area restriction means that even a small kitset residential garage would be required to apply for a consent. For a farm building/structure this means that the rule does not provide for the necessary buildings (such as barns and machinery storage sheds) that a farmer relies upon to effectively operate within the landscape. Farmers and the Council will find themselves going through the resource consent process for everyday buildings and structures that form part of normal farming operations, and which have no more than minor impacts on the values of outstanding natural landscapes and features.</p>	Amend PER-1 (inferred) of Rule NFL-R1 so that the maximum area of structures is 250m <sup>2</sup> instead of 25m <sup>2</sup>
<b>Transpower New Zealand Ltd (S454)</b>	S454.093	Natural features and landscapes	NFL-R1	Not Stated	<p>There is no difference between the requirements of PER-1 and PER-2 and the rule does not allow for the provision of new infrastructure. Due to its linear nature and the requirement to connect new electricity generation to the National Grid, regardless of where the new generation facilities are located, transmission lines may need to traverse any area within the Far North District. While Transpower is required to seek to avoid locating transmission facilities within sensitive areas, there may be occasions</p>	<p>Amend PER-1 and PER-2 of Rule NFL-R1 as follows:            PER-1 <del>if a</del> <b>The</b> new building or structure is <del>located outside the coastal environment</del> it is:            1. ancillary to farming (excluding a residential unit);  <b>and</b>            2. no greater than 25m<sup>2</sup>. <b>The</b></p>



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					when sensitive areas cannot be avoided and, in these cases, critical infrastructure needs to be provided for.	<b>new building or structure is for infrastructure.</b> <del>PER-2If a new building or structure is located within the coastal environment it is:</del> 3. ancillary to farming (excluding a residential unit);4. no greater than 25m <sup>2</sup> .
<b>Top Energy Limited (S483)</b>	S483.158	Natural features and landscapes	NFL-R1	Oppose	<p>No provision has been made to allow for new network utilities of an appropriate scale within these environments.</p> <p>Top Energy generally supports a preference to underground infrastructure where possible in ONL and ONFs, but this needs to be enabled and may require additional network utility buildings and structures (e.g., transformers and pillars) above ground to facilitate this which would otherwise comply with the 25m<sup>2</sup> and 5m height limit afforded to buildings and structures ancillary to farming.</p> <p>On review of the s32 analysis for the Coastal Environment, it is understood that structures associated with primary production are enabled; this analysis does not expressly identify why. However, it is assumed it is because farming activities are a common fixture within this environment and that farming is a dominant primary sector industry within the District as is highlighted in the s32 Overview).</p> <p>Given that connection to electricity infrastructure is critical to such operations, Top Energy seeks that the same permitted activity threshold applies to network utilities.</p> <p>Further Top Energy notes that PER-2 thresholds duplicate that in PER-1.</p>	<p>Amend PER-1 and PER-2 of Rule NFL-R1 as a follows (or to the same effect):</p> <p>."PER-1 If a new building or structure is located outside <b>or inside</b> the coastal environment it is:</p> <p>1.ancillary to farming (excluding a residential unit) <b>or a network utility;</b> 2.no greater than 25m<sup>2</sup>.<del>PER-2If a new building or structure is located within the coastal environment it is:</del>1. ancillary to farming (excluding a residential unit);2. no greater than 25m<sup>2</sup>.</p>
<b>Owen Burn (S490)</b>	S490.003	Natural features and landscapes	NFL-R1	Oppose	The standards proposed for activities within the overlays applying to the site at Orokawa Bay would limit the reasonable development of land within the overlay to an extent that is	Delete the provisions of Rule NFL-R1 relating to height, area and colours/reflectivity for new

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					unnecessarily onerous and inconsistent with the purpose of the Act. Further, the submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include imitations on the height, colour and reflectivity of buildings.	buildings in Outstanding Natural Landscapes
<b>Eric Kloet (S491)</b>	S491.003	Natural features and landscapes	NFL-R1	Oppose	The standards proposed for activities within the overlays applying to the site at Waipohutukawa Bay (Lots 5 and 18 of DP 391213) would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act. Further, the submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include imitations on the height, colour and reflectivity of buildings.	Delete the provisions of Rule NFL-R1 relating to height, area and colours/reflectivity for new buildings in Outstanding Natural Landscapes
<b>Ironwood Trust Limited (S492)</b>	S492.003	Natural features and landscapes	NFL-R1	Oppose	The standards proposed for activities within the overlays applying to the site at Jack's Bay and Waipiro Bay would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act. Further, the submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include the identification of farming and forestry as discretionary activities, setbacks from MHWS and imitations on the height and colour of buildings.	Delete the provisions of Rule NFL-R1 relating to height, area and colours/reflectivity for new buildings in Outstanding Natural Landscapes
<b>William Goodfellow (S493)</b>	S493.004	Natural features and landscapes	NFL-R1	Oppose	As a corollary to the above, the submitter considers that the proposed standards that apply to activities located within the overlays identified above would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act.	Amend to remove provisions limiting the area of new buildings in ONLs.
<b>Ian Jepson (S494)</b>	S494.004	Natural features and landscapes	NFL-R1	Oppose	As a corollary to the above, the submitter considers that the proposed standards that apply to activities located within the overlays identified	Amend to remove provisions limiting the area of new buildings in ONLs.

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					above would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act.	
<b>Ricky Faesen Kloet (S495)</b>	S495.003	Natural features and landscapes	NFL-R1	Oppose	The submitter considers that the proposed standards that apply to activities located within the ONL overlay would limit the reasonable development of land to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act. These include limitations on the height and area, and defining the colours and reflectivity.	Delete Rule NFL-R1 (inferred).
<b>Ricky Faesen Kloet (S495)</b>	S495.006	Natural features and landscapes	NFL-R1	Oppose	The submitter considers that the proposed standards that apply to activities located within the ONL overlay would limit the reasonable development of land to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act. Delete all provisions in the plan that require activities located within an identified ONL to be assessed as non-complying activities.	Delete the non-complying activity status applying to PER-2 of Rule NFL-R1
<b>Philip Thornton (S496)</b>	S496.003	Natural features and landscapes	NFL-R1	Oppose	As a corollary to the above, the submitter considers that the proposed standards that apply to activities located within the overlays identified above would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act.	Amend to remove provisions limiting the area of new buildings in ONLs.
<b>Mark John Wyborn (S497)</b>	S497.013	Natural features and landscapes	NFL-R1	Support in part	The imposition of controls intended to manage development in highly sensitive landscapes are inappropriate in this context and will make the reasonable use and development of the property unfairly and unnecessarily constrained.	Amend to remove provisions limiting the area of new buildings in ONLs.
<b>Northland Planning and Development 2020 Limited (S502)</b>	S502.038	Natural features and landscapes	NFL-R1	Support in part	It is considered that provision should be made for buildings no greater than 25m <sup>2</sup> and not ancillary to farming, such as sheds/garages. PER-4 provides additional controls on height and colours and materials, which are to be complied with. With these controls in place, it is considered that buildings no greater than 25m <sup>2</sup> within sites containing an outstanding landscape overlay, will meet the objectives and policies of	Amend PER-1 and PER-2 of Rule NFL-R1 as follows: PER-1 If a new building or structure is located outside the coastal environment it is:  1. ancillary to farming <b>and no greater than 25m<sup>2</sup></b>

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					<p>the overlay by ensuring the characteristics and qualities of the natural character of the coastal environment is preserved.</p> <p>Provision has also been made for buildings or structures ancillary to farming activities, no greater than 25m<sup>2</sup>. The reasoning behind this is that there are areas which are within ONF or ONL which are not used for farming activities, such a small gardening/storage sheds.</p> <p>Therefore, provision is required for non-habitable buildings not associated with farming activities. Once again, the height, colours and materials of such buildings are controlled by PER-4, such that any building of 25m<sup>2</sup> or less is not considered to adversely affect the characteristics and qualities of the ONL or ONF.</p>	<p>(excluding a residential unit);<b>or</b></p> <p>2. <b>a non-habitable building not ancillary to farming no greater than 25m<sup>2</sup>.</b></p> <p>PER-2 If a new building or structure is located within the coastal environment it is:</p> <p>1. ancillary to farming <b>and no greater than 25m<sup>2</sup></b> (excluding a residential unit);<b>or</b></p> <p>2. <b>a non-habitable building not ancillary to farming no greater than 25m<sup>2</sup>.</b></p> <p>In the event the wider reaching relief if not accepted, we seek that the above relief be applied to the Waitangi Estate only.</p>
<p><b>Waitangi Limited (S503)</b></p>	<p>S503.020</p>	<p>Natural features and landscapes</p>	<p>NFL-R1</p>	<p>Not Stated</p>	<p>It is considered that provision should be made for buildings no greater than 25m<sup>2</sup> and not ancillary to farming, such as sheds/garages. PER-4 provides additional controls on height and colours and materials, which are to be complied with. With these controls in place, it is considered that buildings no greater than 25m<sup>2</sup> within sites with an outstanding landscape overlay, will meet the objectives and policies of the overlay by ensuring the characteristics and qualities of the natural character of the coastal environment is preserved.</p> <p>Provision has also been made for buildings or</p>	<p>Amend PER-1 and PER-2 of Rule NFL-R1 as follows: PER-1 If a new building or structure is located outside the coastal environment it is:</p> <p>1. ancillary to farming <b>and no greater than 25m<sup>2</sup></b> (excluding a residential unit);<b>or</b></p>

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					structures ancillary to farming activities, no greater than 25m <sup>2</sup> . The reasoning behind this is that the area which is subject to the Outstanding Landscape overlay within the Waitangi Treaty Grounds is not used for farming activities. Therefore, provision is required for non-habitable buildings not associated with farming activities. Once again, the height and colours and materials of such buildings are controlled by PER-4, such that any building of 25m <sup>2</sup> or less is not considered to adversely affect the characteristics and qualities of the ONL or ONF.	<p>2. <b>a non-habitable building not ancillary to farming</b> no greater than 25m<sup>2</sup>.</p> <p>PER-2 If a new building or structure is located within the coastal environment it is:</p> <ol style="list-style-type: none"> <li>1. ancillary to farming and no greater than 25m<sup>2</sup> (excluding a residential unit);or</li> <li>2. a non-habitable building not ancillary to farming no greater than 25m<sup>2</sup>.</li> </ol> <p>In the event the wider reaching relief if not accepted, we seek that the above relief be applied to the Waitangi Estate only.</p>
<b>Michael John Winch (S67)</b>	S67.030	Natural features and landscapes	NFL-R2	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	retain the rules
<b>Manulife Forest Management (NZ) Ltd (S160)</b>	S160.022	Natural features and landscapes	NFL-R2	Oppose	The submitter opposes rule NFL-R2 PER-1 as it is considered that the inclusion of farming tracks but the exclusion of plantation forestry tracks is not fair or equitable.	Amend rule to include production forestry tracks.
<b>Bentzen Farm Limited (S167)</b>	S167.042	Natural features and landscapes	NFL-R2	Oppose	Repairs and maintenance should be permitted under the respective rules relating to the buildings, earthworks and indigenous vegetation clearance activity classes within the overlay. Unforeseen consequences will result with the rule as drafted where classes of repairs and maintenance not listed will fall to discretionary activity, triggering costly and unnecessary consent processes.	Delete Rule NFL-R2

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<b>Setar Thirty Six Limited (S168)</b>	S168.044	Natural features and landscapes	NFL-R2	Oppose	There is no need not be a rule for an activity class of repair and maintenance. Repairs and maintenance should be otherwise be permitted under the respective rules relating to the buildings, earthworks and indigenous vegetation clearance activity classes within the overlay. Those rules (as sought to be amended by this submission) most effectively and efficiently manage the effects of relevant activities on the resources managed by the overlay. Unforeseen consequences will result with the rule as drafted where classes of repairs and maintenance not listed will fall to discretionary activity, triggering costly and unnecessary consent processes.	Delete Rule NFL-R2
<b>The Shooting Box Limited (S187)</b>	S187.036	Natural features and landscapes	NFL-R2	Oppose	There is no need not be a rule for an activity class of repair and maintenance.  Repairs and maintenance should be otherwise be permitted under the respective rules relating to the buildings, earthworks and indigenous vegetation clearance activity classes within the overlay. Those rules (as sought to be amended by this submission) most effectively and efficiently manage the effects of relevant activities on the resources managed by the overlay.	Delete Rule NFL-R2
<b>Wendover Two Limited (S222)</b>	S222.045	Natural features and landscapes	NFL-R2	Oppose	There is no need not be a rule for an activity class of repair and maintenance. Repairs and maintenance should be otherwise be permitted under the respective rules relating to the buildings, earthworks and indigenous vegetation clearance activity classes within the overlay. Those rules (as sought to be amended by this submission) most effectively and efficiently manage the effects of relevant activities on the resources managed by the overlay. Unforeseen consequences will result with the rule as drafted where classes of repairs and maintenance not listed will fall to discretionary activity, triggering costly and unnecessary	Delete Rule NFL-R2

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					consent processes. An example is existing houses in the ONF and ONL, whereby their repair and maintenance (including any normal domestic maintenance) would trigger a full discretionary activity resource consent because they are not specified in the repair or maintenance rule.	
<b>Matauri Trustee Limited (S243)</b>	S243.060	Natural features and landscapes	NFL-R2	Oppose	There need not be a rule for an activity class of repair and maintenance. Repairs and maintenance should otherwise be permitted under the respective rules relating to the buildings, earthworks and indigenous vegetation clearance activity classes within the overlay. Those rules (as sought to be amended by this submission) most effectively and efficiently manage the effects of relevant activities on the resources managed by the overlay. Unforeseen consequences will result with the rule as drafted where classes of repairs and maintenance not listed will fall to discretionary activity, triggering costly and unnecessary consent processes.	Delete Rule NFL-R2
<b>Alec Jack (S277)</b>	S277.017	Natural features and landscapes	NFL-R2	Support	I support the ability to repair & maintain as per the listed activities in PER-1. Repairs and maintenance are an essential component of sustainable business and land use.	Retain NFL-R2 PER-1.
<b>P S Yates Family Trust (S333)</b>	S333.036	Natural features and landscapes	NFL-R2	Oppose	There is no need not be a rule for an activity class of repair and maintenance. Repairs and maintenance should be otherwise be permitted under the respective rules relating to the buildings, earthworks and indigenous vegetation clearance activity classes within the overlay. Those rules (as sought to be amended by this submission) most effectively and efficiently manage the effects of relevant activities on the resources managed by the overlay. Unforeseen consequences will result with the rule as drafted where classes of repairs and maintenance not listed will fall to discretionary activity, triggering costly and unnecessary	Delete Rule NFL-R2

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					consent processes. An example is existing houses in the ONF and ONL, whereby their repair and maintenance (including any normal domestic maintenance) would trigger a full discretionary activity resource consent because they are not specified in the repair or maintenance rule.	
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.157	Natural features and landscapes	NFL-R2	Support in part	Federated Farmers seeks that additional activities be included under the permitted threshold in rule NFL-R2. There are activities that are important for the continued viability and operational level for both landowners and emergency services to carry out their duties. These activities may include works that are located within an outstanding natural landscape and/or feature. Examples of such activities included (but are not limited to) activities ancillary to farming activities, emergency related activities for fire, flooding etc and biosecurity related works. Providing for emergency works is necessary to ensure that landowners undertaking necessary work to manage a sudden emergency event can be done without breaching district plan rules. Biosecurity related works are also relevant to ensure clearance can be done due to the increased risk of biosecurity breaches being spread around to flora and fauna.	Amend PER-1 of Rule NFL-R2 to include additional activities, being farming activities, emergency services work, and biosecurity works
<b>Top Energy Limited (S483)</b>	S483.159	Natural features and landscapes	NFL-R2	Support	Top Energy supports the repair or maintenance of network utilities as a permitted activity	Retain Rule NFL-R2
<b>Northland Planning and Development 2020 Limited (S502)</b>	S502.039	Natural features and landscapes	NFL-R2	Support in part	We seek that additional features be added as they are similar in nature to others described within the list. These features are common within areas of ONF and ONL and require ongoing repair and maintenance to ensure there are no adverse impacts on the surrounding environment and that they remain in good condition. It is considered unnecessary for additional consent to be required for repair and maintenance of such features, if the size, scale and materials used are like for like.	Amend Rule NFL-R2 to insert four new matters as follows: <b>Carparking areas</b> <b>Board walks</b> <b>Boat ramps</b> <b>Buildings or structures</b>  In the event the wider reaching relief if not accepted, we seek that the above relief



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					<p>The same is considered to apply for buildings and structures. It is considered that with the additional control of requiring scale, size and materials to be like for like, this will ensure that any repair and maintenance on buildings and/or structures does not change how the natural character of the coastal environment is perceived. Once again, repair and maintenance of lawfully established buildings and structures is required on an on-going basis to ensure that the natural character of the coastal environment is preserved and enhanced.</p>	<p>be applied to the Waitangi Estate only.</p>
<p><b>Waitangi Limited (S503)</b></p>	<p>S503.021</p>	<p>Natural features and landscapes</p>	<p>NFL-R2</p>	<p>Not Stated</p>	<p>We are unsure whether it is the intent of the plan to cover just historic features or whether this rule seeks to extend wider to other elements which may not be historic. Regardless of this fact we seek that the following features also be added as they are similar in nature to others described within the list. These features are common within the coastal environment and require ongoing repair and maintenance to ensure there are no adverse impacts on the surrounding environment and that they remain in good condition. It is considered unnecessary for additional consent to be required for repair and maintenance of such features, if the size, scale and materials used are like for like.</p> <p>The same is considered to apply for buildings and structures. The Operative Plan provided for renovation and maintenance of buildings as a permitted activity, with no requirement for scale, size and materials being like for like. It is considered that with the additional control of requiring scale, size and materials to be like for like, this will ensure that any repair and maintenance on buildings and/or structures does not change how the natural character of the coastal environment is perceived. Once again, repair and maintenance of lawfully established buildings and structures is required on an on-going basis to ensure that the natural character of the coastal is preserved and enhanced.</p>	<p>Amend Rule NFL-R2 to insert four new matters as follows:  <b>Carparking areas</b>  <b>Board walks</b>  <b>Boat ramps</b>  <b>Buildings or structures</b></p> <p>In the event the wider reaching relief if not accepted, we seek that the above relief be applied to the Waitangi Estate only.</p>

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Michael John Winch (S67)	S67.031	Natural features and landscapes	NFL-R3	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	retain the rules
Horticulture New Zealand (S159)	S159.062	Natural features and landscapes	NFL-R3	Support	Clearance for biosecurity purposes is supported.	Retain subsection 4 of PER-1 of Rule NFL-R3
Bentzen Farm Limited (S167)	S167.043	Natural features and landscapes	NFL-R3	Oppose	<p>Given the nature of the PER-1 repair and maintenance activities (ie lawfully established and like for like works), there should be no limit in the volume of earthworks associated with these.</p> <p>More exceptions for normal farming and rural practices should be provided for.</p> <p>The need for exemptions is heightened by the very broad definition of "earthworks" under the National Planning Standard 2019 that has been adopted in the plan. Almost all ground disturbance is captured by this definition.</p> <p>In each instance non conformity should be a restricted discretionary activity.</p> <p>As essentially a technical assessment against a defined set of matters, a non-notification rule is appropriate as it will avoid unnecessary consent cost and risk burden on landowners.</p>	<p>Amend Rule NFL-R3 as follows: Activity status: Permitted Where: PER-1 The earthworks or indigenous vegetation clearance is: <del>1. required for the repair or maintenance permitted under NFL-R2 Repair or maintenance.</del> <b>1. Required for the repair or maintenance of the following activities where they have been lawfully established and where the size, scale and materials used are like for like:</b> <b>1. roads</b> <b>2. fences</b> <b>3. network utilities</b> <b>4. driveways and access</b> <b>5. walking tracks</b> <b>6. cycling tracks</b> <b>7. farming tracks.</b></p> <p>2. required to provide for safe and reasonable clearance for existing overhead power lines. 3. necessary to address a risk to public health and safety. 4. for biosecurity reasons. 5. for the sustainable non-commercial harvest of plant material for rongoā Māori. <b>6.</b></p>

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						<p>for vegetation clearance required to establish or maintain a firebreak within 20m of a dwelling.7. for cultivation (for earthworks only) or domestic gardens.8. for ecosystem protection, rehabilitation or restoration works.9. required to maintain an operational farm (including the maintenance or reinstatement of pasture where the vegetation to be cleared is less than 15 years old and less than 6m in height) or operate a plantation forestry activity.10. required for vegetation clearance to maintain an existing driveway to a dwelling, within 5m of that driveway.11. required for vegetation clearance as a strip of no more than 3.5m wide to construct new fences for the purpose of stock control or boundary delineation.12. required for vegetation clearance within the legal width of an existing formed road.</p> <p>PER-2Except as permitted under PER-1, Tthe earthworks</p>

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						<p>or indigenous vegetation clearance outside the coastal environment <del>is not provided for within NFL-R3 PER-1</del> but it complies with standard NFL-S3 Earthworks or indigenous vegetation clearance PER-3 <b>Except as permitted under PER-1</b> the earthworks or indigenous vegetation clearance inside the coastal environment <del>is not provided for within NFL-R3 PER-1</del> but it complies with standard NFL-S3 Earthworks or indigenous vegetation clearance Amend the activity status where compliance is not achieved with rules PER-1, PER-2 and PER-3 from discretionary /non complying to <b>restricted discretionary</b> in the case of each rule. Insert a matter of discretion as follows:<b>1. The effects on the identified characteristics and qualities values that established the landscape or feature, having regard to:</b>a. <b>the temporary or permanent nature of any adverse effects;</b>b. <b>the ability of the environment to absorb</b></p>

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						<p>change;c. the need for and location of earthworks or vegetation clearance;d. the operational or functional need of any regionally significant infrastructure to be sited in the particular location;e. Except as provided for under k and l below, any viable alternative locations for the activity or development outside the landscape or feature;f. any historical, spiritual or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6;g. the characteristics and qualities of the landscape or feature;h. the physical and visual integrity of the landscape or feature;i. the natural landform and processes of the location; andj. any positive contribution the development has on the characteristics and qualities.k. Whether locating the activity within the ONF or ONL area is required to enable reasonable residential or farming use of the lot.l.</p>

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						<p><b>Whether the location is on a previously approved building platform.</b>            Insert new clause as follows:<b>Earthworks or indigenous vegetation clearance which do not comply with PER1, PER2 or PER3 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</b></p>
<p><b>Bentzen Farm Limited (S167)</b></p>	<p>S167.044</p>	<p>Natural features and landscapes</p>	<p>NFL-R3</p>	<p>Oppose</p>	<p>This rule does not implement policy NFL-P4 of the Proposed Plan.            While existing farms may be protected by existing use rights, new farming methods or practices may not be, and may trigger the need for a resource consent with the rule as proposed. This ignores that in large sections of the district, ONF and ONLs apply over working farms.            The rule will impose significant compliance costs on existing farms where resource consents may be required for every new aspect of their operation.            The rule as proposed is not effective nor efficient as the effects on the values and characteristics of the overlays are better managed through controls on earthworks, vegetation clearance and buildings, rather than the activity of farming.</p>	<p>Delete rule NFL-R3 (assuming reliance can then be placed on the activity status for farming in the underlying zoning as per "Applications Subject to Multiple Provisions" section of the Proposed Plan)            Or, in the alternative, Amend rule NFL-R3 so that Farming is a permitted activity in the overlay.</p>

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<p><b>Setar Thirty Six Limited (S168)</b></p>	<p>S168.045</p>	<p>Natural features and landscapes</p>	<p>NFL-R3</p>	<p>Oppose</p>	<p>Given the nature of the PER-1 repair and maintenance activities (ie lawfully established and like for like works), there should be no limit in the volume of earthworks associated with these.</p> <p>Repair and maintenance activities are better placed as a permitted activity clause within this rule itself, rather than a separate activity class. More exceptions for normal farming and rural practices should be provided for. Where ONLs and ONFs are not farmed, then the vegetation controls provide protection. In particular, exceptions are required for:</p> <ul style="list-style-type: none"> <li>- Maintenance of fire breaks (for ecosystem protection and providing for the health and safety of people)</li> <li>- Cultivation and domestic gardens (continuation of domestic and rural activities).</li> <li>- Ecosystem protection and enhancement (where vegetation may need to be thinned to release new plantings)</li> <li>- Maintenance of driveways and roads.</li> </ul> <p>The need for such exemptions is heightened by the very broad definition of "earthworks" under the National Planning Standard 2019 that has been adopted in the plan. Almost all ground disturbance is captured by this definition. In each instance non-conformity should be a restricted discretionary activity. The scope of assessment is limited and the potential effects well understood and able to be categorised as assessment matters. The policy NFL-P8, provides the necessary matters of assessment and are sought to be repeated in the rule, with the addition of new matters:</p> <ul style="list-style-type: none"> <li>- Whether locating the activity within the ONF or ONL area is required to enable reasonable residential or farming use of the lot.</li> <li>- Whether the location is on a previously approved building platform.</li> </ul> <p>The importance of providing for development on</p>	<p>Amend Rule NFL-R3 as follows:            Activity status: Permitted            Where:            PER-1            The earthworks or indigenous vegetation clearance is:  <del>1-</del>  <del>required for the repair or maintenance permitted under NFL-R2 Repair or maintenance.</del>  <b>1. Required for the repair or maintenance of the following activities where they have been lawfully established and where the size, scale and materials used are like:</b>  <b>1. roads.</b>  <b>2. fences.</b>  <b>3. network utilities.</b>  <b>4. driveways and access.</b>  <b>5. walking tracks.</b>  <b>6. cycling tracks.</b>  <b>7. farming tracks.</b>            2. ...            3. ....            4....            5. ...  <b>6. for vegetation clearance required to establish or maintain a firebreak within 20m of a dwelling.</b>  <b>7. for cultivation (for earthworks only) or domestic gardens.</b>  <b>8. for ecosystem protection, rehabilitation or restoration works.</b>  <b>9. required to maintain an operational</b></p>

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					<p>previously approved building platforms.                      As essentially a technical assessment against a defined set of matters, a non-notification rule is appropriate as it will avoid unnecessary consent cost and risk burden on landowners.</p>	<p><b>farm (including the maintenance or reinstatement of pasture where the vegetation to be cleared is less than 15 years old and less than 6m in height) or operate a plantation forestry activity.</b>10. required for vegetation clearance to maintain an existing driveway to a dwelling, within 5m of that driveway.11. required for vegetation clearance as a strip of no more than 3.5m wide to construct new fences for the purpose of stock control or boundary delineation.12. required for vegetation clearance within the legal width of an existing formed road.</p> <p>PER-2 Except as permitted under PER-1, the earthworks or indigenous vegetation clearance outside the coastal environment is not provided for within NFL-R3 PER-1 but it complies with standard NFL-S3 Earthworks or indigenous vegetation clearance</p> <p>PER-3 Except as permitted under PER-1 the earthworks</p>



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						<p>or indigenous vegetation clearance inside the coastal environment <del>is not provided for within NFL-R3 PER-1</del> but it complies with standard NFL-S3 Earthworks or indigenous vegetation clearance</p> <p>Amend the activity status where compliance is not achieved with rules PER-1, PER-2 and PER-3 from discretionary/non-complying to restricted discretionary in the case of each rule.</p> <p>Insert a matter of discretion as follows:<b>1. The effects on the identified characteristics and qualities values that established the landscape or feature, having regard to:</b>a. the temporary or permanent nature of any adverse effects;<b>b. the ability of the environment to absorb change;</b>c. the need for and location of earthworks or vegetation clearance;<b>d. the operational or functional need of any regionally significant infrastructure to be sited in the particular location;</b>e. Except as provided for under k and l below, any</p>

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						<p><b>viable alternative locations for the activity or development outside the landscape or feature;f. any historical, spiritual or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6;g. the characteristics and qualities of the landscape or feature;h. the physical and visual integrity of the landscape or feature;i. the natural landform and processes of the location; andj. any positive contribution the development has on the characteristics and qualities.</b></p> <p><b>k. Whether locating the activity within the ONF or ONL area is required to enable reasonable residential or farming use of the lot.l. Whether the location is on a previously approved building platform.</b></p> <p><b>Insert a new clause as follows:Earthworks or indigenous vegetation clearance which do not comply with PER1, PER2 or PER3 shall be assessed</b></p>

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						<p><b>without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</b></p>
<p><b>The Shooting Box Limited (S187)</b></p>	<p>S187.037</p>	<p>Natural features and landscapes</p>	<p>NFL-R3</p>	<p>Oppose</p>	<p>Refer to submission for detailed reasons for decision(s) requested relating, but not limited to, the following: there should be no limit in the volume of earthworks given PER-1; repair and maintenance activities are better placed as a permitted activity clause within this rule itself; more exceptions for normal farming and rural practices should be provided for; the need for earthworks exemptions is heightened with the very broad definition of "earthworks" under the National Planning Standard 2019; non-conformity should be a restricted discretionary activity - Policy NFL-P8 provides the necessary matters of assessment; importance of providing development on previously approved building platforms; and a non-notification rule is appropriate as it will avoid unnecessary consent cost and risk burden on landowners.</p>	<p>Amend Rule NFL-R3 as follows:            Activity status: Permitted            Where:            PER-1            The earthworks or indigenous vegetation clearance is: <del>1. required for the repair or maintenance permitted under NFL-R2 Repair or maintenance.</del>  <b>1. Required for the repair or maintenance of the following activities where they have been lawfully established and where the size, scale and materials used are like for like:</b>  <b>1. roads.</b>  <b>2. fences.</b>  <b>3. network utilities.</b>  <b>4. driveways and access.</b>  <b>5. walking tracks.</b>  <b>6. cycling tracks.</b>  <b>7. farming tracks.</b>            2. required to provide for safe and reasonable clearance for existing overhead power lines.            3. necessary to address a risk to public health and safety.            4. for biosecurity reasons.</p>

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						<p>5. for the sustainable non-commercial harvest of plant material for rongoā Māori</p> <p><b>6. for vegetation clearance required to establish or maintain a firebreak within 20m of a dwelling.</b></p> <p>7. for cultivation (for earthworks only) or domestic gardens.</p> <p>8. for ecosystem protection, rehabilitation or restoration works.</p> <p>9. required to maintain an operational farm (including the maintenance or reinstatement of pasture where the vegetation to be cleared is less than 15 years old and less than 6m in height) or operate a plantation forestry activity.</p> <p>10. required for vegetation clearance to maintain an existing driveway to a dwelling, within 5m of that driveway.</p> <p>11. required for vegetation clearance as a strip of no more than 3.5m wide to construct new fences for the purpose of stock control or boundary delineation.</p>

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						<p>12. required for vegetation clearance within the legal width of an existing formed road.</p> <p><del>PER-2</del><b>Except as permitted under PER-1, <del>the earthworks or indigenous vegetation clearance outside the coastal environment is not provided for within NFL-R3 PER-1 but it</del> complies with standard NFL-S3 Earthworks or indigenous vegetation clearance</b></p> <p><del>PER-3</del><b>Except as permitted under PER-1, <del>the earthworks or indigenous vegetation clearance inside the coastal environment is not provided for within NFL R3 PER-1 but it</del> complies with standard NFL-S3 Earthworks or indigenous vegetation clearance.</b></p> <p>Amend the activity status where compliance is not achieved with rules PER-1, Per-2 and PER-3 from discretionary / non-complying to <b>restricted discretionary</b> in the case of each rule.</p> <p>Add a matter of discretion as follows:<b>1. The effects on the identified characteristics and qualities values that</b></p>

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						<p>established the landscape or feature, having regard to:</p> <ul style="list-style-type: none"> <li>a. the temporary or permanent nature of any adverse effects</li> <li>b. the ability of the environment to absorb change</li> <li>c. the need for and location of earthworks or vegetation clearance</li> <li>d. the operational or functional need of any regionally significant infrastructure to be sited in the particular location. Except as provided for under k and l below, any viable alternative locations for the activity or development outside the landscape or feature</li> <li>e. any historical, spiritual or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6</li> <li>f. the characteristics and qualities of the landscape or feature</li> <li>g. the physical and visual integrity of the landscape or feature</li> <li>h. the natural landform and processes of the location</li> <li>i. any positive contribution the development has on the characteristics and</li> </ul>

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						<p><b>qualities.k. Whether locating the activity within the ONF or ONL area is required to enable reasonable residential or farming use of the lot.l. Whether the location is on a previously approved building platform.</b>            Add new clause as follows:<b>Earthworks or indigenous vegetation clearance which do not comply with PER1, PER2 or PER3 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section95B(2) and (3).</b></p>
<p><b>Wendover Two Limited (S222)</b></p>	<p>S222.046</p>	<p>Natural features and landscapes</p>	<p>NFL-R3</p>	<p>Support</p>	<p>Given the nature of the PER-1 repair and maintenance activities (ie lawfully established and like for like works), there should be no limit in the volume of earthworks associated with these. For the reasons set out above in this submission, the repair and maintenance activities are better placed as a permitted activity clause within this rule itself, rather than a separate activity class. More exceptions for normal farming and rural practices should be provided for. In this regard, farming activities are often a feature of the overlay area and not providing for such activities would impose significant consent cost and risks on land</p>	<p>Amend Rule NFL-R3 as follows:            Activity status: Permitted            Where:            PER-1            The earthworks or indigenous vegetation clearance is:<del>1. Required for the repair or maintenance permitted under NFL-R2 Repair or maintenance.</del>  <b>1. Required for the repair or maintenance of the following activities where</b></p>

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					<p>owners. Where ONLs and ONFs are not farmed, then the vegetation controls provide protection. In particular, exceptions are required for:</p> <ul style="list-style-type: none"> <li>- Maintenance of fire breaks (for ecosystem protection and providing for the health and safety of people)</li> <li>- Cultivation and domestic gardens (continuation of domestic and rural activities).</li> <li>- Ecosystem protection and enhancement (where vegetation may need to be thinned to release new plantings)</li> <li>- Maintenance of driveways and roads.</li> </ul> <p>The need for such exemptions is heightened by the very broad definition of "earthworks" under the National Planning Standard 2019 that has been adopted in the plan. Almost all ground disturbance is captured by this definition. In each instance non conformity should be a restricted discretionary activity. The scope of assessment is limited and the potential effects well understood and able to be categorised as assessment matters. The policy NFL-P8, provides the necessary matters of assessment and are sought to be repeated in the rule, with the addition of new matters:</p> <ul style="list-style-type: none"> <li>- Whether locating the activity within the ONF or ONL area is required to enable reasonable residential or farming use of the lot.</li> <li>- Whether the location is on a previously approved building platform.</li> </ul> <p>The importance of providing for development on previously approved building platforms is discussed earlier in this submission. As essentially a technical assessment against a defined set of matters, a non-notification rule is appropriate as it will avoid unnecessary consent cost and risk burden on landowners.</p>	<p><b>they have been lawfully established and where the size, scale and materials used are like for like:1. roads.2. fences3. network utilities4. driveways and access5. walking tracks6. cycling tracks7. farming tracks.</b></p> <p>2. required to provide for safe and reasonable clearance for existing overhead power lines.</p> <p>3. necessary to address a risk to public health and safety.</p> <p>4. for biosecurity reasons.</p> <p>5. for the sustainable non-commercial harvest of plant material for rongoā Māori.6. <b>for vegetation clearance required to establish or maintain a firebreak within 20m of a dwelling.7. for cultivation (for earthworks only) or domestic gardens.8. for ecosystem protection, rehabilitation or restoration works.9. required to maintain an operational farm (including the maintenance or reinstatement of pasture where the vegetation to be cleared is less than 15 years old and less than 6m in height) or operate a</b></p>



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						<p>plantation forestry activity.10. required for vegetation clearance to maintain an existing driveway to a dwelling, within 5m of that driveway.11. required for vegetation clearance as a strip of no more than 3.5m wide to construct new fences for the purpose of stock control or boundary delineation.12. required for vegetation clearance within the legal width of an existing formed road.</p> <p>PER-2 Except as permitted under PER-1, The earthworks or indigenous vegetation clearance outside the coastal environment is not provided for within NFL-R3 PER-1 but it complies with standard NFL-S3 Earthworks or indigenous vegetation clearance</p> <p>PER-3 Except as permitted under PER-1 The earthworks or indigenous vegetation clearance inside the coastal environment is not provided for within NFL-R3 PER-1 but it complies with standard NFL-S3 Earthworks or indigenous vegetation clearance</p>

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						<p>Amend the activity status where compliance is not achieved with rules PER-1, PER-2 and PER-3 from <del>discretionary /non-complying</del> to <b>restricted discretionary</b> in the case of each rule.</p> <p>Insert the matter of discretion as follows:<b>1. The effects on the identified characteristics and qualities values that established the landscape or feature, having regard to:</b>a. the temporary or permanent nature of any adverse effects;b. the ability of the environment to absorb change;c. the need for and location of earthworks or vegetation clearance;d. the operational or functional need of any regionally significant infrastructure to be sited in the particular location;e. Except as provided for under k and l below, any viable alternative locations for the activity or development outside the landscape or feature;f. any historical, spiritual or cultural association held by tangata whenua, with regard to the</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>matters set out in Policy TW-P6;g. the characteristics and qualities of the landscape or feature;h. the physical and visual integrity of the landscape or feature;i. the natural landform and processes of the location; andj. any positive contribution the development has on the characteristics and qualities.k. Whether locating the activity within the ONF or ONL area is required to enable reasonable residential or farming use of the lot.l. Whether the location is on a previously approved building platform.Insert a new clause as follows:Earthworks or indigenous vegetation clearance which do not comply with PER1, PER2 or PER3 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Wendover Two Limited (S222)</b>	S222.047	Natural features and landscapes	NFL-R3	Oppose	Under this rule, farming becomes a non-complying activity in the coastal environment and discretionary elsewhere. This does not implement policy NFL-P4 of the Proposed Plan which recognises that that farming should be provided for in ONLs and ONFs and that the use can form part of the characteristics and values that established the landscape or feature; While existing farms may be protected by existing use rights, new farming methods or practices may not be, and may trigger the need for a resource consent with the rule as proposed. This ignores that in large sections of the district, ONF and ONLs apply over working farms. Furthermore, the values sought to be protected in these overlays often refer to pastoral and open characteristics of landscapes. The rule will impose significant compliance costs on existing farms where resource consents may be required for every new aspect of their operation. The rule as proposed is not effective nor efficient as the effects on the values and characterises of the overlays are better managed through controls on earthworks, vegetation clearance and buildings, rather than the activity of farming. As per the overview explanation of overlays in the Proposed Plan, where there is no specific rule relevant to the activity, then it reverts to its underlying zoning (for example, if Rural Production then farming is a permitted activity). If this is the case, then the rule can and should be deleted for the reasons above. If that is not the case, then an alternative relief is sought that farming is a permitted activity in the overlay.	Delete rule NFL-R3 (assuming reliance can then be placed on the activity status for farming in the underlying zoning as per "Applications Subject to Multiple Provisions" section of the Proposed Plan) Or, in the alternative, Amend rule NFL-R3 so that Farming is a permitted activity in the overlay.
<b>Matauri Trustee Limited (S243)</b>	S243.061	Natural features and landscapes	NFL-R3	Oppose	Given the nature of the PER-1 repair and maintenance activities (i.e. lawfully established and like for like works), there should be no limit in the volume of earthworks associated with these. For the reasons set out above in this submission, the repair and maintenance	Amend Rule NFL-R3 as follows: Activity status: Permitted Where: PER-1 The earthworks or indigenous vegetation clearance is: <del>1-</del> <b>required for the repair or</b>

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					<p>activities are better placed as a permitted activity clause within this rule itself, rather than a separate activity class.</p> <p>More exceptions for normal farming and rural practices should be provided for. In this regard, farming activities are often a feature of the overlay area and not providing for such activities would impose significant consent cost and risks on land owners. Where ONLs and ONFs are not farmed, then the vegetation controls provide protection. In particular, exceptions are required for:</p> <ul style="list-style-type: none"> <li>- Maintenance of fire breaks (for ecosystem protection and providing for the health and safety of people)</li> <li>- Cultivation and domestic gardens (continuation of domestic and rural activities).</li> <li>- Ecosystem protection and enhancement (where vegetation may need to be thinned to release new plantings)</li> <li>- Maintenance of driveways and roads.</li> </ul> <p>The need for such exemptions is heightened by the very broad definition of earthworks" under the National Planning Standard 2019 that has been adopted in the plan. Almost all ground disturbance is captured by this definition. In each instance non-conformity should be a restricted discretionary activity. The scope of assessment is limited and the potential effects well- understood and able to be categorised as assessment matters. The policy NFL-P8, provides the necessary matters of assessment and are sought to be repeated in the rule, with the addition of new matters:</p> <ul style="list-style-type: none"> <li>- Whether locating the activity within the ONF or ONL area is required to enable reasonable residential or farming use of the lot.</li> <li>- Whether the location is on a previously approved building platform.</li> </ul> <p>The importance of providing for development on previously approved building platforms is discussed earlier in this submission.</p>	<p><del>maintenance permitted under NFL-R2 Repair or maintenance.</del></p> <p><b>1. Required for the repair or maintenance of the following activities where they have been lawfully established and where the size, scale and materials used are like for like:1. roads.2. fences3. network utilities4. driveways and access5. walking tracks6. cycling tracks7. farming tracks.</b></p> <p>2. required to provide for safe and reasonable clearance for existing overhead power lines.</p> <p>3. necessary to address a risk to public health and safety.</p> <p>4. for biosecurity reasons.</p> <p>5. for the sustainable non-commercial harvest of plant material for rongoā Māori.</p> <p><b>6. for vegetation clearance required to establish or maintain a firebreak within 20m of a dwelling.7. for cultivation (for earthworks only) or domestic gardens.8. for ecosystem protection, rehabilitation or restoration works.9. required to maintain an operational farm</b></p>

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					<p>As essentially a technical assessment against a defined set of matters, a non-notification rule is appropriate as it will avoid unnecessary consent cost and risk burden on landowners.</p>	<p><b>(including the maintenance or reinstatement of pasture where the vegetation to be cleared is less than 15 years old and less than 6m in height) or operate a plantation forestry activity.10. required for vegetation clearance to maintain an existing driveway to a dwelling, within 5m of that driveway.11. required for vegetation clearance as a strip of no more than 3.5m wide to construct new fences for the purpose of stock control or boundary delineation.12. required for vegetation clearance within the legal width of an existing formed road.</b></p> <p>PER-2 <b>Except as permitted under PER-1,</b> the earthworks or indigenous vegetation clearance outside the coastal environment <del>is not provided for within NFL-R3 PER-1</del> but it complies with standard NFL-S3 Earthworks or indigenous vegetation clearance</p> <p>PER-3 <b>Except as permitted under PER-1</b> the earthworks or indigenous vegetation</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>clearance inside the coastal environment is <del>not provided for within NFL R3 PER 1</del> but it complies with standard NFL-S3 Earthworks or indigenous vegetation clearance</p> <p>Amend the activity status where compliance is not achieved with rules PER-1, PER-2 and PER-3 from discretionary/non-complying to restricted discretionary in the case of each rule.</p> <p>Add a matter of discretion as follows:<b>1. The effects on the identified characteristics and qualities values that established the landscape or feature, having regard to:</b>a. the temporary or permanent nature of any adverse effects;b. the ability of the environment to absorb change;c. the need for and location of earthworks or vegetation clearance;d. the operational or functional need of any regionally significant infrastructure to be sited in the particular location;e. Except as provided for under k and l below, any viable alternative locations</p>

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						<p>for the activity or development outside the landscape or feature;f. any historical, spiritual or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6;g. the characteristics and qualities of the landscape or feature;h. the physical and visual integrity of the landscape or feature;i. the natural landform and processes of the location; andj. any positive contribution the development has on the characteristics and qualities.k. Whether locating the activity within the ONF or ONL area is required to enable reasonable residential or farming use of the lot.l. Whether the location is on a previously approved building platform.</p> <p>Add new clause as follows:Earthworks or indigenous vegetation clearance which do not comply with PER1, PER2 or PER3 shall be assessed without public or limited</p>



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						<p><b>notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</b></p>
<p><b>Matauri Trustee Limited (S243)</b></p>	<p>S243.062</p>	<p>Natural features and landscapes</p>	<p>NFL-R3</p>	<p>Oppose</p>	<p>Under this rule, farming becomes a non-complying activity in the coastal environment and discretionary elsewhere. This does not implement policy NFL-P4 of the Proposed Plan which recognises that that farming should be provided for in ONLs and ONFs and that the use can form part of the characteristics and values that established the landscape or feature.</p> <p>While existing farms may be protected by existing use rights, new farming methods or practices may not be, and may trigger the need for a resource consent with the rule as proposed. This ignores that in large sections of the district, ONF and ONLs apply over working farms. Furthermore, the values sought to be protected in these overlays often refer to pastoral and open characteristics of landscapes. The rule will impose significant compliance costs on existing farms where resource consents may be required for every new aspect of their operation.</p> <p>The rule as proposed is not effective nor efficient as the effects on the values and characteristics of the overlays are better managed through controls on earthworks, vegetation clearance and buildings, rather than the activity of farming. As per the overview explanation of overlays in the Proposed Plan, where there is no specific rule relevant to the activity, then it reverts to its underlying zoning (for example, if Rural Production then farming is a permitted activity). If this is the case, then the rule can and</p>	<p>Delete rule NFL-R3 (assuming reliance can then be placed on the activity status for farming in the underlying zoning as per "Applications Subject to Multiple Provisions" section of the Proposed Plan) Or, in the alternative,</p> <p>Amend rule NFL-R3 so that Farming is a permitted activity in the overlay.</p>

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					should be deleted for the reasons above. If that is not the case, then an alternative relief is sought that farming is a permitted activity in the overlay.	
<b>Alec Jack (S277)</b>	S277.018	Natural features and landscapes	NFL-R3	Support	I support the ability to undertake earthworks and indigenous vegetation clearance.	Retain NFL-R3.
<b>P S Yates Family Trust (S333)</b>	S333.037	Natural features and landscapes	NFL-R3	Oppose	<p>Given the nature of the PER-1 repair and maintenance activities (ie lawfully established and like for like works), there should be no limit in the volume of earthworks associated with these.</p> <p>For the reasons set out above in this submission, the repair and maintenance activities are better placed as a permitted activity clause within this rule itself, rather than a separate activity class.</p> <p>More exceptions for normal farming and rural practices should be provided for. In this regard, farming activities are often a feature of the overlay area and not providing for such activities would impose significant consent cost and risks on land owners. Where ONLs and ONFs are not farmed, then the vegetation controls provide protection. In particular, exceptions are required for:</p> <ul style="list-style-type: none"> <li>- Maintenance of fire breaks (for ecosystem protection and providing for the health and safety of people)</li> <li>- Cultivation and domestic gardens (continuation of domestic and rural activities).</li> <li>- Ecosystem protection and enhancement (where vegetation may need to be thinned to release new plantings)</li> <li>- Maintenance of driveways and roads.</li> </ul>	<p><b>Amend Rule NFL-R3 as follows:</b><i>Activity status: Permitted Where: PER-1 The earthworks or indigenous vegetation clearance is: 1. required for the repair or maintenance permitted under NFL-R2</i>  <b>Repair or maintenance.1. Required for the repair or maintenance of the following activities where they have been lawfully established and where the size, scale and materials used are like for like: 1. roads. 2. fences 3. network utilities 4. driveways and access 5. walking tracks 6. cycling tracks 7. farming tracks. 2. required to provide for safe and reasonable clearance for existing overhead power lines.3. necessary to address a risk to public health and safety.4. for biosecurity reasons. 5. for the sustainable non-commercial</b></p>

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						<p><i>harvest of plant material for rongoā Māori. 6. forvegetation clearance required to establish or maintain a firebreak within 20mof a dwelling. 7. for cultivation (for earthworks only) or domestic gardens. 8. for ecosystem protection, rehabilitation or restoration works. 9. required to maintain anoperational farm (including the maintenance or reinstatement of pasture wherethe vegetation to be cleared is less than 15 years old and less than 6m inheight) or operate a plantation forestry activity. 10. required for vegetationclearance to maintain an existing driveway to a dwelling, within 5m of thatdriveway. 11. required for vegetationclearance as a strip of no more than 3.5m wide to construct new fences for thepurpose of stock control or boundary delineation. 12. required for vegetationclearance within the legal width of an existing formed road. PER-2 Except as</i></p>

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						<p><b>permitted under PER-1</b>, The earthworks or indigenous vegetation clearance <i>outside the coastal environment</i> <del>is not provided for within NFL-R3 PER-1</del> but it complies with standard NFL-S3 Earthworks or indigenous vegetation clearance PER-3</p> <p><b>Except as permitted under PER-1</b> The earthworks or indigenous vegetation clearance <i>inside the coastal environment</i> <del>is not provided for within NFL-R3 PER-1</del> but it complies with standard NFL-S3 Earthworks or indigenous vegetation clearance <b>Amend</b> the activity status where compliance is not achieved with rules PER-1, PER-2 and PER-3 from <del>discretionary/non-complying</del> to restricted discretionary in the case of each rule.</p> <p>Insert a matter of discretion as follows: 1. <i>The effects on the identified characteristics and qualities values that established the landscape or feature, having regard to: a. the temporary or permanent</i></p>

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						<p><i>nature of any adverse effects; <b>b.</b> the ability of the environment to absorb change; <b>c.</b> the need for and location of earthworks or vegetation clearance; <b>d.</b> the operational or functional need of any regionally significant infrastructure to be sited in the particular location; <b>e.</b> Except as provided for under <b>k</b> and <b>l</b> below, any viable alternative locations for the activity or development outside the landscape or feature; <b>f.</b> any historical, spiritual or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6; <b>g.</b> the characteristics and qualities of the landscape or feature; <b>h.</b> the physical and visual integrity of the landscape or feature; <b>i.</b> the natural landform and processes of the location; and <b>j.</b> any positive contribution the development has on the characteristics and qualities. <b>k.</b> Whether locating the activity within the ONF or ONL area is required to enable reasonable residential or</i></p>

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						<p><i>farming use of the lot. 1.</i>  <b>Whether the location is on a previously approved building platform.</b>            Insert new clause as follows:  <b>Earthworks or indigenous vegetation clearance which do not comply with PER1, PER2 or PER3 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</b></p>
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.158	Natural features and landscapes	NFL-R3	Support in part	Federated Farmers seeks that additional activities be included under the permitted threshold in rule NFL-R3. There are activities that are important for the continued viability and operational level for both landowners and emergency services to carry out their duties. These activities may include works that are located within an outstanding natural landscape and/or feature. Examples of such activities included (but are not limited to) activities ancillary to farming activities, emergency related activities for fire, flooding etc and works required for access.	Amend PER-1 of Rule NFL-R3 to include additional activities, being farming activities, emergency services works, and works required for access
<b>Kapiro Conservation Trust (S442)</b>	S442.100	Natural features and landscapes	NFL-R3	Oppose	There is a risk that including this rule will lead to contradictions with the IB and earthwork rules.	Delete NFL -R3 in first instance. Or Amend to include conditions that ensure compliance with the IB and earthworks rules.

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<p><b>Top Energy Limited (S483)</b></p>	<p>S483.161</p>	<p>Natural features and landscapes</p>	<p>NFL-R3</p>	<p>Not Stated</p>	<p>Top Energy supports NFL-R3 in particular PER-1 (2) but seeks that this be extended to provide for upgrading as provided for in the new rule sought. Further, Top Energy suggests that PER-3 is deleted and PER-2 relied on for both inside and outside of the coastal environment noting that in both instances NFL-S3 is referenced.</p>	<p>Insert new point and amend PER 1 of Rule NFL-R3, amend PER-2 of Rule NFL-R3, and delete PER-3 of Rule NFL-R3 as follows (or to the same effect):</p> <p>Activity status: Permitted Where: PER-1 The earthworks or indigenous vegetation clearance is: 1.required for the repair or maintenance permitted under NFL-R2 Repair or maintenance-: <b>or</b> 2.required to provide for safe and reasonable clearance for existing overhead power lines-: or 3.necessary to address a risk to public health and safety-: or 4.for biosecurity reasons-: or 5.for the sustainable non-commercial harvest of plant material for rongoā Māori-: <b>or6.Required for the upgrade of network utilities where the works are permitted under NF-RX</b> PER-2 The earthworks or indigenous vegetation clearance <b>is inside or outside</b> the coastal environment is not provided for within NFL-R3 PER-1 but it</p>

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						complies with standard NFL-S3 Earthworks or indigenous vegetation clearance <del>PER-3The earthworks or indigenous vegetation clearance inside the coastal environment is not provided for within NFL-R3 PER-1 but it complies with standard NFL-S3 Earthworks or indigenous vegetation clearance to provide for earthworks and vegetation clearance associated with upgrading of infrastructure.</del>
<b>Ricky Faesen Kloet (S495)</b>	S495.012	Natural features and landscapes	NFL-R3	Oppose	The submitter considers that the proposed standards that apply to activities located within the ONL overlay would limit the reasonable development of land to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act. Delete all provisions in the plan that require activities located within an identified ONL to be assessed as non-complying activities.	Delete the non-complying activity status applying to PER-3 of Rule NFL-R3
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.081	Natural features and landscapes	NFL-R3	Oppose	There is a risk that including this rule will lead to contradictions with the IB and earthwork rules.	Delete NFL -R3 in first instance Or Amend to include conditions that ensure compliance with the IB and earthworks rules.
<b>Michael John Winch (S67)</b>	S67.032	Natural features and landscapes	NFL-R4	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	retain the rules
<b>Michael John Winch (S67)</b>	S67.033	Natural features and landscapes	NFL-R5	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	retain the rules



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<b>PF Olsen Limited (S91)</b>	S91.011	Natural features and landscapes	NFL-R5	Oppose	<p>There is no provision for non-complying activities under the Natural and Built Environments Bill. Plantation forests and plantation forestry activities are primary production activities in a working rural landscape. Where plantation forest already exists within an Outstanding Natural Landscape or Outstanding Natural Feature, it should be considered as a permitted activity and the associated plantation forest activities should also be permitted.</p> <p>Plantation forestry is a long term land use, with considerable financial inputs decades before any financial benefits are realised. To remove certainty of harvest and the ability to undertake other plantation forest activities does not give effect to the objectives and policies of the Proposed Plan, including Objectives NFL-02, RPROZ-O1, RPROZ-O3, RPROZ-O4 and policies RPROZ-P1.</p> <p>Limited earthworks and indigenous vegetation clearance are provided for other primary production industries but there is no provision for any plantation forestry activities. This is unjustified and inequitable.</p> <p>No justification has been provided for the inclusion of more stringent rules for plantation forestry. Just because regulation 6 of the NES-PF enables this, that in itself is not justification. Regulation 12 of the National Environmental Standards for Plantation Forests already requires afforestation within an outstanding natural feature or landscape to obtain consent as a restricted discretionary activity.</p>	Delete Rule NFL-R5; and Insert permitted activity status to existing plantation forests and associated plantation forest activities.
<b>Summit Forests New Zealand Limited (S148)</b>	S148.028	Natural features and landscapes	NFL-R5	Not Stated	The chapter on Outstanding Natural Landscapes (ONL) and Outstanding Natural Features (ONF) fails to provide equitably for all primary production activities. In particular, it fails to recognise that, where plantation forestry already exists within an ONL or ONF, it should be considered as a legitimate part of the landscape and provided for as a permitted activity subject to the provisions of the NES-PF.	Delete NFL-R5

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<b>Manulife Forest Management (NZ) Ltd (S160)</b>	S160.023	Natural features and landscapes	NFL-R5	Oppose	The submitter opposes rule NFL-R5 Plantation forestry and plantation forestry activity and considers that a discretionary activity status is onerous and does not allow for this activity on rural production land in an ONL and ONF to be established.	Delete rule NFL-R5 Plantation forestry and plantation forestry activity.
<b>Alec Jack (S277)</b>	S277.019	Natural features and landscapes	NFL-R5	Oppose	I oppose the discretionary rule applying to plantation forestry and associated activities because our ruminant agriculture is under climate change pressures to switch land use into carbon sequestration and this rule will add complexity and expense to this desired land use change. There is no justification for an unlimited discretionary activity consent status to be required in this specialised context, far exceeding the objective as set out in NFL-O2.	Amend Rule NFL-R5 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 natural features and landscape values.
<b>Ricky Faesen Kloet (S495)</b>	S495.013	Natural features and landscapes	NFL-R5	Oppose	The submitter considers that the proposed standards that apply to activities located within the ONL overlay would limit the reasonable development of land to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act. Delete all provisions in the plan that require activities located within an identified ONL to be assessed as non-complying activities.	Delete the non-complying activity status applying to Rule NFL-R5
<b>Michael John Winch (S67)</b>	S67.034	Natural features and landscapes	NFL-R6	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	retain the rules
<b>Lynley Newport (S96)</b>	S96.001	Natural features and landscapes	NFL-R6	Oppose	The submitter considers it unacceptable, unreasonable and unjustified that NFL-R6 deems farming within an Outstanding Natural Feature and Outstanding Natural Landscape and outside the coastal environment, to be a discretionary activity. The submitter also considers the rule to be inconsistent with policy NFL-P4 which provides for farming activities within an Outstanding Natural Feature and Outstanding Natural Landscape.	Delete NFL-R6 or amend activity status to restricted discretionary with the matters of discretion related to the matters listed in NFL-P4, i.e whether the activity will form part of the characteristics and qualities that established the landscape or feature; whether the activity is consistent with and does not compromise the characteristics and qualities of the landscape or feature.

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<b>Horticulture New Zealand (S159)</b>	S159.063	Natural features and landscapes	NFL-R6	Oppose	There should be provision for rural production activities as a permitted activity. Rule NFL-R6 should give effect to NFL-P4.	Amend Rule NFL-R6, also including a permitted activity threshold as follows: <b>NFL-R6 Farming Rural ProductionPER-1 The activity is existing lawfully established rural production activity</b> Insert - <b>Activity status where compliance not achieved with PER-1 - Restricted discretionary</b> Delete <del>DIS-1- The farming activity and is located outside the coastal environment.</del> Delete non-complying status relating to DIS-1.
<b>Thomson Survey Ltd (S198)</b>	S198.002	Natural features and landscapes	NFL-R6	Oppose	The submitter opposes NFL-R6 and contends that making any kind of farming within an ONL or ONF a discretionary activity is unjustified, unacceptable and unreasonable.	Delete NRL-R6 or alternatively Amend NRL-R6 activity status to restricted discretionary and the matters of discretion should be related to the matters listed in NFL-P4
<b>Alec Jack (S277)</b>	S277.020	Natural features and landscapes	NFL-R6	Oppose	I oppose the discretionary status applied to farming in this area - this is farmland and it is farming that has been the guardian of this ONF. Without farming it wouldn't be the fascinating landform that it is. I oppose this restrictive rule also because it impacts 270ha of our land and would cause unreasonable regulatory complexity and cost to our family business. Good fences and water systems ensure livestock can be managed without causing the accelerated erosion associated with treading damage from livestock walking between grass and water.	Delete rule NFL-R6 and make farming a permitted activity.

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<p><b>Northland Federated Farmers of New Zealand (S421)</b></p>	<p>S421.159</p>	<p>Natural features and landscapes</p>	<p>NFL-R6</p>	<p>Oppose</p>	<p>Good farm management will preserve and enhance the area.</p> <p>Federated Farmers does not support the rule and the activity classification that it has. It is illogical for the Council to require farmers to gain a resource consent if they are farming within an outstanding natural landscape or feature that is located outside of the coastal environment. Many farmers have existing operations which have occurred over decades with no more than minor effects on the surrounding environment. For many landowners the resource consent process will be too costly to make their operation economically viable.</p> <p>The rule as proposed is inconsistent with the purpose and principles of the Resource Management Act 1991. It is inappropriate as many outstanding natural landscapes and features are located in rural areas where the rural landscape adds to their value. Farming operations assist in the maintenance and protection of outstanding natural landscapes and features.</p> <p>It is felt that the Council is overreaching its functions under the Act through stating farming is inappropriate land use within the defined areas. It is not appropriate to try and retrofit a consenting framework through a proposed district plan for an activity which has been operating legally within the specified environments. Federated Farmers does not support the proposed requirement that farming as an activity will require resource consent moving forward. We also do not support relying on existing use rights as this does not provide any clarity for landowners and Council. A reliance on existing use rights typically results in expensive discussions to establish what is included under an existing use right if one exists. Federated Farmers holds the view that existing use rights are for the same scale and character</p>	<p>Delete Rule NFL-R6</p>

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					which is very hard to define for farming activities.	
<b>Ricky Faesen Kloet (S495)</b>	S495.014	Natural features and landscapes	NFL-R6	Oppose	The submitter considers that the proposed standards that apply to activities located within the ONL overlay would limit the reasonable development of land to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act. Delete all provisions in the plan that require activities located within an identified ONL to be assessed as non-complying activities.	Delete the non-complying activity status applying to Rule NFL-R6
<b>Northland Planning and Development 2020 Limited (S502)</b>	S502.040	Natural features and landscapes	NFL-R6	Oppose	Changes are sought to remove the restriction on farming activities within an area of ONL and ONF. Under this rule, if the location is within an ONL or ONF and is located within the coastal environment, then any farming activity will be a non-complying activity. This contradicts Policy NFL-P4 which stipulates that farming activities can be provided for within ONL and ONF where there is no compromise to any identified characteristics and qualities of the ONL or ONF. It is considered that farming activities should be a permitted activity within and outside of the coastal environment.	Delete NFL-R6 (inferred)
<b>Waitangi Limited (S503)</b>	S503.022	Natural features and landscapes	NFL-R6	Not Stated	Changes are sought to remove the restriction on farming activities with an area of ONL and ONF. Under this rule, if the location is within an ONL or ONF and is located within the coastal environment, then any farming activity will be a non-complying activity. This contradicts Policy NFL-P4 which stipulates providing for farming activities within ONL and ONF where there is no compromise to any identified characteristics and qualities of the ONL or ONF. It is considered that farming activities should be a permitted activity within and outside of the coastal environment.	Delete Rule NFL-R6 (inferred)
<b>Michael John Winch (S67)</b>	S67.035	Natural features and landscapes	NFL-R7	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	retain the rules
<b>John Andrew Riddell (S431)</b>	S431.176	Natural features and landscapes	NFL-R7	Not Stated	Reference correction	Delete references in the Plan to 'Moturua Island zone' and

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						'Motoura Island zone', and replace with 'Moturoa Island zone'
<b>Kapiro Conservation Trust (S442)</b>	S442.101	Natural features and landscapes	NFL-R7	Oppose	Forest & Bird does not support the rule for extending mineral extraction activities in ONL's and ONFs. The extension of such existing activities would more appropriately be non-complying in ONL's and prohibited in ONFs. This is because while ONLs may be able to absorb some further modification from quarrying activities the same can not be said for ONFs. New quarrying activities should be prohibited for both ONLs and ONFs as should new plantation forestry.	Delete Rule NFL-R7.
<b>Ricky Faesen Kloet (S495)</b>	S495.015	Natural features and landscapes	NFL-R7	Oppose	The submitter considers that the proposed standards that apply to activities located within the ONL overlay would limit the reasonable development of land to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act. Delete all provisions in the plan that require activities located within an identified ONL to be assessed as non-complying activities.	Delete the non-complying activity status applying to Rule NFL-R7
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.082	Natural features and landscapes	NFL-R7	Oppose	Forest & Bird does not support the rule for extending mineral extraction activities in ONL's and ONFs. The extension of such existing activities would more appropriately be non-complying in ONL's and prohibited in ONFs. This is because while ONLs may be able to absorb some further modification from quarrying activities the same can not be said for ONFs. New quarrying activities should be prohibited for both ONLs and ONFs as should new plantation forestry.	Delete Rule NFL-R7
<b>Michael John Winch (S67)</b>	S67.036	Natural features and landscapes	NFL-R8	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	retain the rules
<b>Michael John Winch (S67)</b>	S67.037	Natural features and landscapes	NFL-R9	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	retain the rules
<b>Russell Protection</b>	S179.079	Natural features and landscapes	Standards	Support	In view of the fact that coastal zones are not provided for in the Proposed district plan, then the Coastal Environment, Natural Character and	Retain standards

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Society (INC) (S179)</b>					<p>Natural Features and Landscape Overlays become very important in helping to define the boundaries of Russell and in safeguarding a suitable backdrop or canvass which to interpret and appreciate the historic township.</p> <p>It is especially important that these overlays provide adequate protection to the headlands framing Russell and the natural coastal escarpments that characterize the balance of the Russell Peninsula. For this reason it is important to control subdivision and development of coastal lands in the area.</p>	
<b>Nicole Way and Christopher Huljich as Trustees of the Trssh Birnie Settlement Trust (S345)</b>	S345.012	Natural features and landscapes	Standards	Oppose	<p>The Resource Consents at Mataka Station enable development, and completion of the Mataka Station development, notwithstanding the provisions of the Proposed District Plan. The Proposed District Plan fails to recognise, have regard to, or provide for the development and subdivision enabled by the Resource Consents.</p> <p>The Proposed District Plan provisions will restrict development of the Property, and Mataka Station more generally, in a manner that is inconsistent with the Resource Consents and the integrated and comprehensive development authorised by those. The Council's s32 analysis does not mention, or consider approved but unimplemented developments within the Property and Mataka Station more generally, nor elsewhere. The "low intensity" development controls and height limits proposed within the Coastal Environment are given very little analysis.</p> <p>The proposed provisions are inconsistent with the Act and relevant planning instruments.</p>	<p>Amend to explicitly, and specifically provide for, and preserve the activities and land uses authorised under the Resource Consents at Mataka Station.</p> <p>and/or</p> <p>Insert a new special purpose zone and/or structure plan together with appropriate provisions (objectives, policies and rules) enabling the residential activity and development as is authorised by the Resource Consents as a permitted activity (where they are in general accordance with the Resource Consents) as well as appropriate activities within the Rural Production Zone, regardless of the provisions of the CE, ONL or HNC.</p> <p>and/or</p> <p>Amend the provisions of the Proposed District Plan to preserve the activities and buildings authorised by the Resource Consents on the Property.</p>

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<b>Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)</b>	S425.036	Natural features and landscapes	Standards	Support in part	PHTTCCT consider that the provisions do not adequately provide for the maintenance, operation and upgrade of regionally significant infrastructure in accordance with the RPS.	Amend the provisions of NFL to ensure that maintenance, operation, and upgrade of regionally significant infrastructure is provided for.
<b>Michael John Winch (S67)</b>	S67.038	Natural features and landscapes	NFL-S1	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	retain the standards
<b>Lynley Newport (S97)</b>	S97.001	Natural features and landscapes	NFL-S1	Support in part	The submitter considers that the 5m maximum height in NFL-S1 could be increased to 6m without increasing the risk of visual impact. The submitter also considers that the wording of the remainder of the standard in #1 is too open to interpretation.	Amend NFL-S1 to read: 1. The maximum height of any new building or structure above ground level is 6m and must not exceed the height of the nearest ridgeline, headland or peninsula within or adjacent to the property. Amend NFL-S1 2. similarly.
<b>Bentzen Farm Limited (S167)</b>	S167.045	Natural features and landscapes	NFL-S1	Oppose	The maximum height specified of 5m may or may not be appropriate in the circumstances, and is best assessed and determined at resource consent stage for the building under NFL-R1. The requirement to not exceed the height of the nearest ridgeline, headland or peninsula as a height limit lacks precision and measurability, with these factors better taken into account at resource consent stage.	Delete Standard NFL-S1
<b>Setar Thirty Six Limited (S168)</b>	S168.046	Natural features and landscapes	NFL-S1	Oppose	The maximum height specified of 5m may or may not be appropriate in the circumstances, and is best assessed and determined at resource consent stage for the building under NFL-R1. The height limit of the zone would otherwise apply to smaller (less than 50m structures). The requirement to not exceed the height of the nearest ridgeline, headland or peninsula as a height limit lacks precision and measurability, with these factors better taken into account at resource consent stage.	Delete Standard NFL-S1



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>The Shooting Box Limited (S187)</b>	S187.038	Natural features and landscapes	NFL-S1	Oppose	<p>The maximum height specified of 5m may or may not be appropriate in the circumstances, and is best assessed and determined at resource consent stage for the building under NFL-R1.</p> <p>The height limit of the zone would otherwise apply to smaller (less than 50m structures).</p> <p>The requirement to not exceed the height of the nearest ridgeline, headland or peninsula as a height limit lacks precision and measurability, with these factors better taken into account at resource consent stage.</p>	Delete Standard NFL-S1
<b>Wendover Two Limited (S222)</b>	S222.048	Natural features and landscapes	NFL-S1	Oppose	<p>The maximum height specified of 5m may or may not be appropriate in the circumstances, and is best assessed and determined at resource consent stage for the building under NFL-R1. The height limit of the zone would otherwise apply to smaller (less than 50m structures). The requirement to not exceed the height of the nearest ridgeline, headland or peninsula as a height limit lacks precision and measurability, with these factors better taken into account at resource consent stage.</p>	Delete Standard NFL-S1
<b>Matauri Trustee Limited (S243)</b>	S243.063	Natural features and landscapes	NFL-S1	Oppose	<p>The maximum height specified of 5m may or may not be appropriate in the circumstances, and is best assessed and determined at resource consent stage for the building under NFL-R1.</p> <p>The height limit of the zone would otherwise apply to smaller (less than 50m structures). The requirement to not exceed the height of the nearest ridgeline, headland or peninsula as a height limit lacks precision and measurability, with these factors better taken into account at resource consent stage.</p>	Delete Standard NFL-S1
<b>Alec Jack (S277)</b>	S277.021	Natural features and landscapes	NFL-S1	Oppose	<p>Regarding the standards (NFL-S1, 2 &amp; 3) I oppose such restrictive standards on the height of buildings, the colours and materials used, and</p>	Amend standards NFL-S1, 2 & 3, so that there are more permissive standards on the height of

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					earthworks. I want the FNDC to make these standards more permissive in areas out of public view. 270ha of our land is impacted by this standard.	buildings, the colours and materials used, and earthworks.
<b>P S Yates Family Trust (S333)</b>	S333.038	Natural features and landscapes	NFL-S1	Oppose	The maximum height specified of 5m may or may not be appropriate in the circumstances, and is best assessed and determined at resource consent stage for the building under NFL-R1. The height limit of the zone would otherwise apply to smaller (less than 50m structures). The requirement to not exceed the height of the nearest ridgeline, headland or peninsula as a height limit lacks precision and measurability, with these factors better taken into account at resource consent stage.	Delete Standard NFL-S1
<b>William Goodfellow (S493)</b>	S493.003	Natural features and landscapes	NFL-S1	Oppose	As a corollary to the above, the submitter considers that the proposed standards that apply to activities located within the overlays identified above would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act.	Amend to remove provisions limiting the height of new buildings in ONLs.
<b>Ian Jepson (S494)</b>	S494.003	Natural features and landscapes	NFL-S1	Oppose	As a corollary to the above, the submitter considers that the proposed standards that apply to activities located within the overlays identified above would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act.	Amend to remove provisions limiting the height of new buildings in ONLs.
<b>Ricky Faesen Kloet (S495)</b>	S495.004	Natural features and landscapes	NFL-S1	Oppose	The submitter considers that the proposed standards that apply to activities located within the ONL overlay would limit the reasonable development of land to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act. These include limitations on	Delete NFL-S1 (inferred).

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					the height and area, and defining the colours and reflectivity.	
<b>Philip Thornton (S496)</b>	S496.002	Natural features and landscapes	NFL-S1	Oppose	As a corollary to the above, the submitter considers that the proposed standards that apply to activities located within the overlays identified above would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act.	Amend to remove provisions limiting the height of new buildings in ONLs.
<b>Mark John Wyborn (S497)</b>	S497.003	Natural features and landscapes	NFL-S1	Support in part	The imposition of controls intended to manage development in highly sensitive landscapes are inappropriate in this context and will make the reasonable use and development of the property unfairly and unnecessarily constrained.	Amend to remove provisions limiting the height of new buildings in ONLs.
<b>Michael John Winch (S67)</b>	S67.039	Natural features and landscapes	NFL-S2	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	retain the standards
<b>Horticulture New Zealand (S159)</b>	S159.064	Natural features and landscapes	NFL-S2	Oppose	This standard would limit colour of cloth used in orchards.	Amend Standard NFL-S2 to include: <b>artificial crop protection structures are either dark green or black</b>
<b>Bentzen Farm Limited (S167)</b>	S167.046	Natural features and landscapes	NFL-S2	Support in part	The rule should allow for natural materials also.	Amend Standard NFL-S2 as follows: The exterior surfaces of buildings or structures shall: 1. be constructed of materials and/or finished to achieve a reflectance value no greater than 30%. 2. have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette <b>or are a natural finish stone or timber.</b>
<b>Setar Thirty Six Limited (S168)</b>	S168.047	Natural features and landscapes	NFL-S2	Support in part	The rule should allow for natural materials also.	Amend Standard NFL-S2 as follows: The exterior surfaces of buildings

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						<p>or structures shall:</p> <ol style="list-style-type: none"> <li>1. be constructed of materials and/or finished to achieve a reflectance value no greater than 30%.</li> <li>2. have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette <b>or are a natural finish stone or timber.</b></li> </ol>
<p><b>The Shooting Box Limited (S187)</b></p>	<p>S187.039</p>	<p>Natural features and landscapes</p>	<p>NFL-S2</p>	<p>Support in part</p>	<p>The rule should allow for natural materials also.</p>	<p>Amend Standard NFL-S2 as follows: The exterior surfaces of buildings or structures shall:</p> <ol style="list-style-type: none"> <li>1. be constructed of materials and/or finished to achieve a reflectance value no greater than 30%.</li> <li>2. have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette <b>or are a natural finish stone or timber.</b></li> </ol>
<p><b>Wendover Two Limited (S222)</b></p>	<p>S222.049</p>	<p>Natural features and landscapes</p>	<p>NFL-S2</p>	<p>Support in part</p>	<p>The rule should allow for natural materials also.</p>	<p>Amend Standard NFL-S2 as follows: The exterior surfaces of buildings or structures shall:</p> <ol style="list-style-type: none"> <li>1. be constructed of materials and/or finished to achieve a reflectance value no greater than 30%.</li> <li>2. have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette <b>or are a natural finish stone or timber.</b></li> </ol>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Matauri Trustee Limited (S243)</b>	S243.064	Natural features and landscapes	NFL-S2	Support in part	The rule should allow for natural materials also.	Amend Standard NFL-S2 as follows: The exterior surfaces of buildings or structures shall: 1. be constructed of materials and/or finished to achieve a reflectance value no greater than 30%. 2. have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette <b>or are a natural finish stone or timber.</b>
<b>Alec Jack (S277)</b>	S277.022	Natural features and landscapes	NFL-S2	Oppose	Regarding the standards (NFL-S1, 2 &3) I oppose such restrictive standards on the height of buildings, the colours and materials used, and earthworks. I want the FNDC to make these standards more permissive in areas out of public view. 270ha of our land is impacted by this standard.	Amend standards NFL-S1, 2 & 3, so that there are more permissive standards on the height of buildings, the colours and materials used, and earthworks.
<b>P S Yates Family Trust (S333)</b>	S333.039	Natural features and landscapes	NFL-S2	Support in part	The rule should allow for natural materials also.	Amend Standard NFL-S2 as follows: The exterior surfaces of buildings or structures shall: 1. be constructed of materials and/or finished to achieve a reflectance value no greater than 30%. 2. have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette <b>or are a natural finish stone or timber.</b>
<b>William Goodfellow (S493)</b>	S493.005	Natural features and landscapes	NFL-S2	Oppose	As a corollary to the above, the submitter considers that the proposed standards that apply to activities located within the overlays identified above would limit the reasonable development of land within the overlay to an extent that is	Amend to remove provisions defining the colours and reflectivity of new buildings in ONLs.

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					unnecessarily onerous and inconsistent with the purpose of the Act.	
Ian Jepson (S494)	S494.005	Natural features and landscapes	NFL-S2	Oppose	As a corollary to the above, the submitter considers that the proposed standards that apply to activities located within the overlays identified above would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act.	Amend to remove provisions defining the colours and reflectivity of new buildings in ONLs.
Ricky Faesen Kloet (S495)	S495.005	Natural features and landscapes	NFL-S2	Oppose	The submitter considers that the proposed standards that apply to activities located within the ONL overlay would limit the reasonable development of land to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act. These include limitations on the height and area, and defining the colours and reflectivity	Delete Standard NFL-S2 (inferred).
Philip Thornton (S496)	S496.004	Natural features and landscapes	NFL-S2	Oppose	As a corollary to the above, the submitter considers that the proposed standards that apply to activities located within the overlays identified above would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act.	Amend to remove provisions defining the colours and reflectivity of new buildings in ONLs.
Mark John Wyborn (S497)	S497.004	Natural features and landscapes	NFL-S2	Support in part	The imposition of controls intended to manage development in highly sensitive landscapes are inappropriate in this context and will make the reasonable use and development of the property unfairly and unnecessarily constrained.	Amend to remove provisions defining the colours and reflectivity of new buildings in ONLs.
Northland Planning and Development 2020 Limited (S502)	S502.041	Natural features and landscapes	NFL-S2	Support in part	Many coloursteel colours, which have an LRV of less than 30% are not listed within the BS5252 standard colour palette. An example of this is Coloursteel Sandstone Grey, which is a very common colour used and has an LRV of 27% but is not listed within the BS5252 colour range. This results in consent being required for a large number of sheds/garages, dwelling roofs, which are constructed of coloursteel materials and have an LRV of less than 30%, but are not stated within the BS5252 standard colour palette range. The Resene BS5252 colour range was	Amend NFL-S2 The exterior surfaces of buildings or structures shall 1. be constructed of materials and/or finished to achieve a <b>light</b> reflectance value no greater than 30%. <del>2. have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette</del> or in

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					<p>created in 2008 and is therefore outdated. It also gives an unfair trade advantage to Resene where only their products can be utilised. It is considered that with the requirement of an LRV no greater than 30%, the intention of this rule will still be achieved, and will remove the need for consent for coloursteel products which have an LRV of less than 30% (as well as any other products which have the same issue). Furthermore, by deleting point 2, it enables natural wood products such as cedar to be utilized which are not painted or stained without requiring consent.</p>	<p>the event this relief is not accepted we ask that Council make the following changes -</p> <p><b>2. If painted</b> have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette <b>or equivalent product</b></p>
<p><b>Waitangi Limited (S503)</b></p>	<p>S503.023</p>	<p>Natural features and landscapes</p>	<p>NFL-S2</p>	<p>Not Stated</p>	<p>Reference to the BS5252 standard colour range has been removed. Many coloursteel colours, which have an LRV of less than 30% are not listed within the BS5252 standard colour palette. An example of this is Coloursteel Sandstone Grey, which is a very common colour used and has an LRV of 27% but is not listed within the BS5252 colour range. This results in consent being required for a large number of sheds/garages, dwelling roofs, which are constructed of coloursteel materials and have an LRV of less than 30%, but are not stated within the BS5252 standard colour palette range. The Resene BS5252 colour range was created in 2008 and is therefore very outdated. It also gives an unfair trade advantage to Resene where only their products can be utilized. It is considered that with the requirement of an LRV no greater than 30%, the intention of this rule will still be achieved, and will remove the need for consent for coloursteel products which have an LRV of less than 30% (as well as any other products which have the same issue). Furthermore, by deleting point 2, it enables natural wood products such as cedar to be utilized which are not painted or stained without requiring consent.</p>	<p>Amend Standard NFL-S2 as follows: The exterior surfaces of buildings or structures shall:</p> <ol style="list-style-type: none"> <li>1. be constructed of materials and/or finished to achieve a <b>light</b> reflectance value no greater than 30%.</li> <li>2. <del>have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette.</del></li> </ol> <p>In the event that the above relief is not accepted we ask that Council make the following changes to point 2 (inferred): <b>If painted</b>, have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette <b>or equivalent product</b></p>

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Michael John Winch (S67)	S67.040	Natural features and landscapes	NFL-S3	Support	I generally support the provisions of the Proposed District Plan in respect of protecting natural landscape values.	retain the standards
Bentzen Farm Limited (S167)	S167.047	Natural features and landscapes	NFL-S3	Support in part	<p>Amendments are sought to the rule so that earthworks or indigenous vegetation clearance associated with access and/or a building platform are not subject to the preceding subclause 1-3s.</p> <p>Also, as drafted, it could be interpreted that only earthworks and vegetation clearance for the purpose of access and/or a building platform are permitted.</p> <p>Life of District Plan as a compliance measure is unnecessarily limited and does not recognise the ability for the land to heal each season (ie calendar year) after earthworks.</p> <p>Screening should only be from public places (which includes the CMA) for the rule to efficiently apply.</p>	<p>Amend rule NFL-S3 (inferred) as follows:</p> <p>Any earthworks or indigenous vegetation clearance must (where relevant):</p> <ol style="list-style-type: none"> <li>1. not exceed a total area of 50m<sup>2</sup> <del>over the life of the District Plan.</del> <b>per calendar year; and</b></li> <li>2. not exceed a cut height or fill depth of <del>1m</del> <b>1.5m.; and</b></li> <li>3. screen any exposed faces <b>visible from a public place.; or</b></li> <li>4. be for the purpose of access and/or a building platform.</li> </ol> <p>Note: The NESF requires a 10m setback from any natural wetland in respect of earthworks or vegetation clearance and may require consent from the Regional Council.</p>
Setar Thirty Six Limited (S168)	S168.048	Natural features and landscapes	NFL-S3	Support in part	<p>Amendments are sought to the rule so that earthworks or indigenous vegetation clearance associated with access and/or a building platform are not subject to the preceding subclause 1-3s. Otherwise, such works would trigger the need for consent in almost every instance (building platforms generally being greater than 50m<sup>2</sup>).</p> <p>Also, as drafted, it could be interpreted that only earthworks and vegetation clearance for the purpose of access and/or a building platform are permitted (eg not farming earthworks and</p>	<p>Amend standard NFL-S3 (inferred) as follows:</p> <p>Any earthworks or indigenous vegetation clearance must (where relevant):</p> <ol style="list-style-type: none"> <li>1. not exceed a total area of 50m<sup>2</sup> <del>over the life of the District Plan.</del> <b>per calendar year; and</b></li> <li>2. not exceed a cut height or fill depth of <del>1m</del> <b>1.5m.; and</b></li> <li>3. screen any exposed faces</li> </ol>



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>vegetation clearance).                      These changes are appropriate because earthworks or indigenous vegetation clearance associated with the building is assessed as a restricted discretionary activity matter with the building resource consent application.                      Life of District Plan as a compliance measure is unnecessarily limited and does not recognise the ability for the land to heal each season (ie calendar year) after earthworks.                      Screening should only be from public places (which includes the CMA) for the rule to efficiently apply.</p>	<p><b>visible from a public place;</b> or                      ...</p>
<p><b>The Shooting Box Limited (S187)</b></p>	<p>S187.040</p>	<p>Natural features and landscapes</p>	<p>NFL-S3</p>	<p>Support</p>	<p>Refer to submission for detailed reasons for decision(s) requested relating, but not limited to, the following: earthworks or indigenous vegetation clearance works would trigger the need for consent in almost every instance (building platforms generally being greater than 50m<sup>2</sup>); earthworks and vegetation clearance for the purpose of access and/or a building platform are permitted; life of District Plan as a compliance measure is unnecessarily limited and does not recognise the ability for the land to heal each season after earthworks; and screening should only be from public places.</p>	<p>Amend rule NFL-S3 (inferred) as follows:                      Any earthworks or indigenous vegetation clearance must (where relevant):                      1. not exceed a total area of 50m<sup>2</sup> <del>over the life of the District Plan.</del> <b>per calendar year;</b> and                      2. not exceed a cut height or fill depth of <del>1m</del> <b>1.5m.</b>; and                      3. screen any exposed faces <b>visible from a public place;</b> or                      4. be for the purpose of access and/or a building platform.                      Note: The NESF requires a 10m setback from any natural wetland in respect of earthworks or vegetation clearance and may require consent from the Regional Council.</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Wendover Two Limited (S222)</b>	S222.050	Natural features and landscapes	NFL-S3	Support in part	Amendments are sought to the rule so that earthworks or indigenous vegetation clearance associated with access and/or a building platform are not subject to the preceding subclause 1-3s. Otherwise, such works would trigger the need for consent in almost every instance (building platforms generally being greater than 50m <sup>2</sup> ). Also, as drafted, it could be interpreted that only earthworks and vegetation clearance for the purpose of access and/or a building platform are permitted (eg not farming earthworks and vegetation clearance). These changes are appropriate because earthworks or indigenous vegetation clearance associated with the building is assessed as a restricted discretionary activity matter with the building resource consent application. Life of District Plan as a compliance measure is unnecessarily limited and does not recognise the ability for the land to heal each season (ie calendar year) after earthworks. Screening should only be from public places (which includes the CMA) for the rule to efficiently apply.	Amend rule NFL-S3 (inferred) as follows: Any earthworks or indigenous vegetation clearance must (where relevant): 1. not exceed a total area of 50m <sup>2</sup> <del>over the life of the District Plan.</del> <b>per calendar year; and</b> 2. not exceed a cut height or fill depth of <del>1m</del> <b>1.5m;</b> and 3. screen any exposed faces <b>visible from a public place;</b> or 4. be for the purpose of access and/or a building platform. Note: The NESF requires a 10m setback from any natural wetland in respect of earthworks or vegetation clearance and may require consent from the Regional Council.
<b>Matauri Trustee Limited (S243)</b>	S243.065	Natural features and landscapes	NFL-S3	Support in part	Amendments are sought to the rule so that earthworks or indigenous vegetation clearance associated with access and/or a building platform are not subject to the preceding subclause 1-3s. Otherwise, such works would trigger the need for consent in almost every instance (building platforms generally being greater than 50m <sup>2</sup> ). Also, as drafted, it could be interpreted that only earthworks and vegetation clearance for the purpose of access and/or a building platform are permitted (e.g. not farming earthworks and vegetation clearance). These changes are appropriate because earthworks or indigenous vegetation clearance associated with the building is assessed as a	Amend rule NFL-S3 (inferred) as follows: Any earthworks or indigenous vegetation clearance must (where relevant): 1. not exceed a total area of 50m <sup>2</sup> <del>over the life of the District Plan.</del> <b>per calendar year; and</b> 2. not exceed a cut height or fill depth of <del>1m</del> <b>1.5m;</b> and 3. screen any exposed faces <b>visible from a public place;</b> or 4. be for the purpose of access

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					restricted discretionary activity matter with the building resource consent application. Life of District Plan as a compliance measure is unnecessarily limited and does not recognise the ability for the land to heal each season (i.e. calendar year) after earthworks. Screening should only be from public places (which includes the CMA) for the rule to efficiently apply	and/or a building platform. Note: The NESF requires a 10m setback from any natural wetland in respect of earthworks or vegetation clearance and may require consent from the Regional Council.
<b>Alec Jack (S277)</b>	S277.023	Natural features and landscapes	NFL-S3	Oppose	Regarding the standards (NFL-S1, 2 &3) I oppose such restrictive standards on the height of buildings, the colours and materials used, and earthworks. I want the FNDC to make these standards more permissive in areas out of public view. 270ha of our land is impacted by this standard.	Amend standards NFL-S1, 2 & 3, so that there are more permissive standards on the height of buildings, the colours and materials used, and earthworks.
<b>P S Yates Family Trust (S333)</b>	S333.040	Natural features and landscapes	NFL-S3	Support in part	Amendments are sought to the rule so that earthworks or indigenous vegetation clearance associated with access and/or a building platform are not subject to the preceding subclause 1-3s. Otherwise, such works would trigger the need for consent in almost every instance (building platforms generally being greater than 50m2). Also, as drafted, it could be interpreted that only earthworks and vegetation clearance for the purpose of access and/or a building platform are permitted (eg not farming earthworks and vegetation clearance). These changes are appropriate because earthworks or indigenous vegetation clearance associated with the building is assessed as a restricted discretionary activity matter with the building resource consent application.	Amend rule NFL-S3 (inferred) as follows: Any earthworks or indigenous vegetation clearance must (where relevant): 1. not exceed a total area of 50m2 <del>over the life of the District Plan.</del> <b>per calendar year; and</b> 2. not exceed a cut height or fill depth of <del>1m</del> <b>1.5m.</b> ; and 3. screen any exposed faces <del>visible from a public place.</del> ; or 4. be for the purpose of access and/or a building platform. Note: The NESF requires a 10m setback from any natural wetland in respect of earthworks or vegetation clearance and may require

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					Life of District Plan as a compliance measure is unnecessarily limited and does not recognise the ability for the land to heal each season (ie calendar year) after earthworks. Screening should only be from public places (which includes the CMA) for the rule to efficiently apply.	consent from the Regional Council.
<b>Kapiro Conservation Trust (S442)</b>	S442.104	Natural features and landscapes	NFL-S3	Oppose	There is a risk that including this rule will lead to contradictions with the IB and earthwork rules.	Delete NFL-S3 in first instance, Or Amend to include conditions that ensure compliance with the OB and earthworks rules.
<b>Northland Planning and Development 2020 Limited (S502)</b>	S502.042	Natural features and landscapes	NFL-S3	Support in part	Under the Proposed Plan, any site not within the ONL, ONF or coastal environment overlay, as a permitted activity can undertake an earthworks activity over an area of 2500m <sup>2</sup> , which is significantly greater than the 50m <sup>2</sup> provided for over 10 years from the notification of the District Plan. 50m <sup>2</sup> of earthworks over 10 years is very restrictive and with the changes being made to the definition of earthworks likely to trigger consent for a number of activities, including repair and maintenance activities not already covered under NFL-R2. It is considered more appropriate to allow 100m <sup>2</sup> of earthworks per calendar year for sites within the ONF and ONL overlay. This will ensure that earthworks are controlled to a certain degree, whilst still enabling ongoing activities as well as establishment of some new buildings or structures, which do not breach the 100m <sup>2</sup> area. The provision for 100m <sup>2</sup> of earthworks per calendar year is considered to be a good compromise to ensure that the objectives and policies within the ONF and ONL overlay are adhered to. 2.13. Again with repair and maintenance we seek clarification that where mentioned that	Amend NFL-S3 Any earthworks or indigenous vegetation clearance must (where relevant): 1. Not exceed a total area of <del>50m<sup>2</sup> over the life of the District Plan</del> <b>100 m<sup>2</sup> per calendar year</b> 2. Not exceed a cut height or fill depth of 1m 3. Screen any exposed faces 4. Be for the purpose of <b>establishing or maintaining an access and/or building platform, or undertaking repair and maintenance activities which are not covered by NFL-R2.</b>

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					these activities only relate to historic items as general repair and maintenance activities can generate some small scale earthworks.	
<b>Waitangi Limited (S503)</b>	S503.024	Natural features and landscapes	NFL-S3	Not Stated	<p>Under the Proposed Plan, any site not within the ONL, ONF or coastal environment overlay, as a permitted activity can undertake an earthworks activity over an area of 2500m<sup>2</sup>, which is significantly greater than the 50m<sup>2</sup> provided for over 10 years from the notification of the District Plan.</p> <p>50m<sup>2</sup> of earthworks over 10 years is very restrictive and with the changes being made to the definition of earthworks likely to trigger consent for a number of activities, including repair and maintenance activities not already covered under NFL-R2. It is considered more appropriate to allow 100m<sup>2</sup> of earthworks per calendar year for sites within the ONF and ONL overlay. This will ensure that earthworks are controlled to a certain degree, whilst still enabling ongoing activities as well as establishment of some new buildings or structures, which do not breach the 100m<sup>2</sup> area. The provision for 100m<sup>2</sup> of earthworks per calendar year is considered to be a good compromise to ensure that the objectives and policies within the ONF and ONL overlay are adhered to.</p>	<p>Amend Standard NFL-S3 as follows:</p> <p>Any earthworks or indigenous vegetation clearance must (where relevant):</p> <ol style="list-style-type: none"> <li>1. not exceed a total area of <b>50m<sup>2</sup> over the life of the District Plan 100 m<sup>2</sup> per calendar year.</b></li> <li>2. ...</li> <li>3. ..</li> <li>4. be for the purpose of <b>establishing or maintaining an access and/or a building platform, or undertaking repair and maintenance activities which are not covered by NFL-R2.</b></li> </ol> <p>We seek clarification that where mentioned that these activities only relate to historic items as general repair and maintenance activities can generate some small scale earthworks</p>
<b>Royal Forest and Bird Protection Society of New Zealand (S511)</b>	S511.085	Natural features and landscapes	NFL-S3	Oppose	There is a risk that including this rule will lead to contradictions with the IB and earthwork rules.	Delete NFL-S3 in first instance Or Amend to include conditions that ensure compliance with the IB and earthworks rules.

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<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.160	Public access	Overview	Support in part	The District Plan needs to be clear that access is not available across private land unless it is with permission from the landowner. The landowner should not be compelled by the District Plan to always provide access across what is essentially their business and home. Many rural landowners, particularly coastal or riparian margin landowners, have encounters with unwelcome trespassers, some with dogs, that are disruptive to their farming operations, create security issues for themselves and their stock, have put themselves into dangerous situations, or created nuisance effects like littering or human waste. It is appropriate and legal to limit access across private property when this access will be unsafe or will disrupt farming activities, such as when tree felling or earthmoving is occurring, or during harvest or lambing activities.	Amend the Overview so that it addresses the issue of public access across private property and the need to ensure that this access is provided with the agreement of the landowner where it is practicable to provide that access
<b>Our Kerikeri Community Charitable Trust (S272)</b>	S272.017	Public access	Objectives	Support in part	The PDP proposes only voluntary creation of esplanade reserves for land use activities. The s32 report (p.32) notes the cost of a voluntary approach: 'No requirements for esplanades reserves where lots greater than 4ha are created for land use activities... potentially misses opportunities for improved access to waterbodies and the coast'. This cost applies also in the case of smaller lots. We consider that the requirement for esplanade reserve should apply to land use applications.	Amend provisions to include requirements for esplanade reserves when consenting land use and other forms of development
<b>Our Kerikeri Community Charitable Trust (S272)</b>	S272.023	Public access	Objectives	Support in part	In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System. s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present. PDP provisions relating to esplanade and reserves need to include clauses that will	Amend provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values	
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.163	Public access	Objectives	Support in part	The landowner's private property rights are a key area of focus which needs to be considered within this chapter.	Insert a new Objective as follows: <b>Practical and safe public access to and along the margins of lakesand 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.</b>  or wording with similar intent
<b>Kapiro Conservation Trust (S445)</b>	S445.015	Public access	Objectives	Support	The PDP proposes only voluntary creation of esplanade reserves for land use activities. The s32 report (p.32) notes the cost of a voluntary approach: 'No requirements for esplanades reserves where lots greater than 4ha are created for land use activities... potentially misses opportunities for improved access to waterbodies and the coast'. This cost applies also in the case of smaller lots. We consider that the requirement for esplanade reserve should apply to land use applications.	Amend provisions that normally require esplanade reserves when consenting land use and other forms of development.
<b>Kapiro Conservation Trust (S445)</b>	S445.017	Public access	Objectives	Support in part	In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System. s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to	Amend provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					the protection of indigenous species are not sufficient at present. PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values	
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)</b>	S523.017	Public access	Objectives	Support in part	The PDP proposes only voluntary creation of esplanade reserves for land use activities. The s32 report (p.32) notes the cost of a voluntary approach: 'No requirements for esplanades reserves where lots greater than 4ha are created for land use activities... potentially misses opportunities for improved access to waterbodies and the coast'. This cost applies also in the case of smaller lots. We consider that the requirement for esplanade reserve should apply to land use applications.	Amend provisions to include requirements for esplanade reserves when consenting land use and other forms of development
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)</b>	S523.019	Public access	Objectives	Support in part	In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System. s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present. PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values	Amend provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values
<b>Carbon Neutral NZ Trust (S529)</b>	S529.192	Public access	Objectives	Support in part	In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System. s32 report (p.3) notes that policies to protect	Amend provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present. PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values	System and areas with significant ecological values
<b>Te Rūnanga o Ngāti Rēhia (S559)</b>	S559.046	Public access	Objectives	Support in part	Ngāti Rēhia are the kaitiaki of the water resources within our rohe.	Insert an objective into the PDP that focuses on the relationship of tangata whenua to their ancestral waterways and the maintenance of that relationship.
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.161	Public access	PA-O1	Support	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.	Retain Objective PA-O1 or ensure that amendments include similar wording that achieves the same intent
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.162	Public access	PA-O2	Support	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.	Retain Objective PA-O2 or ensure that amendments include similar wording that achieves the same intent
<b>Our Kerikeri Community Charitable Trust (S272)</b>	S272.016	Public access	Policies	Support in part	The PDP proposes only voluntary creation of esplanade reserves for land use activities. The s32 report (p.32) notes the cost of a voluntary approach: 'No requirements for esplanades reserves where lots greater than 4ha are created for land use activities... potentially misses opportunities for improved access to waterbodies and the coast'. This cost applies also in the case of smaller lots.	Amend provisions to include requirements for esplanade reserves when consenting land use and other forms of development

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					We consider that the requirement for esplanade reserve should apply to land use applications.	
<b>Our Kerikeri Community Charitable Trust (S272)</b>	S272.024	Public access	Policies	Support in part	In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System. s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present. PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values	Amend provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.169	Public access	Policies	Support in part	The policy section needs to include private property as a consideration when providing public access to ensure that it does not cause damage or create security risks. As a group, farmers provide more public access across their private property than other landowners (such as residential or industrial). Farmers are familiar with the adverse effects that result from public access such as rubbish, weed incursions and nuisance effects on their homes and places of work. The provision of public access also provides for weed incursions which are of particular concern with Chilean Needle Grass and Yellow Bristle Grass now in the region, which can create significant damage to livestock welfare and pasture quality.	Insert a new Policy as follows: <b>PA-P6 To provide information and education to the public regarding where public access is available, and that access over private land is only by the permission of the landowner</b> or wording with similar intent
<b>Kapiro Conservation Trust (S445)</b>	S445.016	Public access	Policies	Not Stated	The PDP proposes only voluntary creation of esplanade reserves for land use activities. The s32 report (p.32) notes the cost of a voluntary approach: 'No requirements for esplanades reserves where lots greater than 4ha are created for land use activities... potentially misses opportunities for improved	Amend provisions to include requirements for esplanade reserves when consenting land use and other forms of development

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					access to waterbodies and the coast'. This cost applies also in the case of smaller lots. We consider that the requirement for esplanade reserve should apply to land use applications.	
<b>Kapiro Conservation Trust (S445)</b>	S445.018	Public access	Policies	Support in part	In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System. s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present. PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values	Amend provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)</b>	S523.018	Public access	Policies	Support in part	The PDP proposes only voluntary creation of esplanade reserves for land use activities. The s32 report (p.32) notes the cost of a voluntary approach: 'No requirements for esplanades reserves where lots greater than 4ha are created for land use activities... potentially misses opportunities for improved access to waterbodies and the coast'. This cost applies also in the case of smaller lots. We consider that the requirement for esplanade reserve should apply to land use applications.	Amend provisions to include requirements for esplanade reserves when consenting land use and other forms of development
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)</b>	S523.020	Public access	Policies	Support in part	In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System. s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not	Amend provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					sufficient at present. PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values	
<b>Carbon Neutral NZ Trust (S529)</b>	S529.186	Public access	Policies	Support	The PDP proposes only voluntary creation of esplanade reserves for land use activities. The s32 report (p.32) notes the cost of a voluntary approach: 'No requirements for esplanades reserves where lots greater than 4ha are created for land use activities... potentially misses opportunities for improved access to waterbodies and the coast'. This cost applies also in the case of smaller lots. We consider that the requirement for esplanade reserve should apply to land use applications.	Amend provisions to include requirements for esplanade reserves when consenting land use and other forms of development
<b>Carbon Neutral NZ Trust (S529)</b>	S529.187	Public access	Policies	Support	The PDP proposes only voluntary creation of esplanade reserves for land use activities. The s32 report (p.32) notes the cost of a voluntary approach: 'No requirements for esplanades reserves where lots greater than 4ha are created for land use activities... potentially misses opportunities for improved access to waterbodies and the coast'. This cost applies also in the case of smaller lots. We consider that the requirement for esplanade reserve should apply to land use applications.	Amend provisions to include requirements for esplanade reserves when consenting land use and other forms of development
<b>Carbon Neutral NZ Trust (S529)</b>	S529.193	Public access	Policies	Support in part	In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System. s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present. PDP provisions relating to esplanade and reserves need to include clauses that will	Amend provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values	
<b>Lynley Newport (S98)</b>	S98.001	Public access	PA-P1	Support in part	The submitter supports that the Public Access chapter deals solely with objectives and policies and contains no rules and cross references to rules relating to public access in other chapters. The submitter considers that throughout the chapter any references to esplanade reserves need to be amended to include the words esplanade strips.	Amend PA-P1 to read as follows: Protect, maintain and enhance public and customary access by 2. requiring subdivision activities to provide esplanade reserves or strips along the coastal marine area and waterbodies; and
<b>Our Kerikeri Community Charitable Trust (S272)</b>	S272.001	Public access	PA-P1	Support	Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. In particular we support - Public access policies PA-P1 to PA-P5  PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more. PDP provisions that normally require esplanade reserves when consenting land use and other forms of development. Improve provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values.	Retain PA-P1
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.164	Public access	PA-P1	Support	Federated Farmers supports policies PA-P1 to PA-5 as they are currently drafted in the proposed district plan.	Retain Policy PA-P1 or ensure that amendments include similar wording that achieves the same intent
<b>Kapiro Conservation Trust (S445)</b>	S445.001	Public access	PA-P1	Support	Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development. In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active	Retain PA- P1

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					<p>transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section):</p> <ul style="list-style-type: none"> <li>- 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3)</li> <li>- 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3)</li> </ul>	
<p><b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)</b></p>	<p>S523.001</p>	<p>Public access</p>	<p>PA-P1</p>	<p>Support</p>	<p>Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.</p> <p>In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section):</p> <ul style="list-style-type: none"> <li>- 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3)</li> <li>- 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more</li> </ul>	<p>Retain PA-P1</p>

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					allotments less than 4ha' adjacent to relevant waterway etc. (p.3)	
<b>Carbon Neutral NZ Trust (S529)</b>	S529.056	Public access	PA-P1	Support	<p>Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. In particular we support - Public access policies PA-P1 to PA-P5</p> <p>PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more.</p> <p>PDP provisions that normally require esplanade reserves when consenting land use and other forms of development.</p> <p>Improve provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values.</p>	Retain PA-P1
<b>Lynley Newport (S98)</b>	S98.002	Public access	PA-P2	Support in part	<p>The submitter supports that the Public Access chapter deals solely with objectives and policies and contains no rules and cross references to rules relating to public access in other chapters. The submitter considers that throughout the chapter any references to esplanade reserves need to be amended to include the words esplanade strips.</p>	Amend PA-P2 as follows: Require the creation of esplanade reserves or strips to and along the coastal marine area and waterbodies when considering an application for subdivision where it:
<b>Bentzen Farm Limited (S167)</b>	S167.048	Public access	PA-P2	Oppose	<p>Policy PA-P2 does not align with the subdivision rules which implement this policy, where such circumstances are limited.</p> <p>The policy should integrate with the equivalent policy in the subdivision section (SUB- P7) so that the specific method for achieving the policy is specified in the rule rather than in the policy.</p>	Delete policy PA-P2 and replace with: <b>"Require esplanade reserves or strips when subdividing to specified lot sizes land adjoining the coast and other qualifying water-bodies"</b> .

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<b>Setar Thirty Six Limited (S168)</b>	S168.049	Public access	PA-P2	Oppose	<p>Policy PA-P2 sets out a number of circumstances at a.-g. where public access is required to be provided at subdivision. These do not align with the subdivision rules which implement this policy, where such circumstances are limited.</p> <p>The policy should integrate with the equivalent policy in the subdivision section (SUB- P7) so that the specific method for achieving the policy is specified in the rule rather than in the policy. For example, the obligation of policy PA-P2 to require the creation of esplanade reserves where it 'c. protects, maintains or enhances public access' goes beyond the limited circumstances specified in rule SUB-S8.</p>	Delete policy PA-P2 and insert the following replacement: <b>Require esplanade reserves or strips when subdividing to specified lot sizes land adjoining the coast and other qualifying water-bodies.</b>
<b>The Shooting Box Limited (S187)</b>	S187.041	Public access	PA-P2	Oppose	<p>Policy PA-P2 sets out a number of circumstances at a.-g. where public access is required to be provided at subdivision. These do not align with the subdivision rules which implement this policy, where such circumstances are limited.</p> <p>The policy should integrate with the equivalent policy in the subdivision section (SUB- P7) so that the specific method for achieving the policy is specified in the rule rather than in the policy. For example, the obligation of policy PA-P2 to require the creation of esplanade reserves where it 'c. protects, maintains or enhances public access' goes beyond the limited circumstances specified in rule SUB-S8.</p>	Delete policy PA-P2 and replace with: <b>"Require esplanade reserves or strips when subdividing to specified lot sizes land adjoining the coast and other qualifying water-bodies"</b> .
<b>Matauri Trustee Limited (S243)</b>	S243.066	Public access	PA-P2	Oppose	<p>Policy PA-P2 sets out a number of circumstances at a.-g. where public access is required to be provided at subdivision. These do not align with the subdivision rules which implement this policy, where such circumstances are limited.</p> <p>The policy should integrate with the equivalent policy in the subdivision section (SUB- P7) so that the specific method for achieving the policy is specified in the rule rather than in the policy.</p>	Delete policy PA-P2 and replace with: <b>Require esplanade reserves or strips when subdividing to specified lot sizes land adjoining the coast and other qualifying water-bodies.</b>



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					For example, the obligation of policy PA-P2 to require the creation of esplanade reserves where it 'c. protects, maintains or enhances public access' goes beyond the limited circumstances specified in rule SUB-S8.	
<b>Our Kerikeri Community Charitable Trust (S272)</b>	S272.011	Public access	PA-P2	Support in part	<p>Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. In particular we support - Public access policies PA-P1 to PA-P5</p> <p>PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more.</p> <p>PDP provisions that normally require esplanade reserves when consenting land use and other forms of development.</p> <p>Improve provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values.</p>	Retain PA-P2
<b>P S Yates Family Trust (S333)</b>	S333.041	Public access	PA-P2	Oppose	<p>Policy PA-P2 sets out a number of circumstances at a.g. where public access is required to be provided at subdivision. These do not align with the subdivision rules which implement this policy, where such circumstances are limited.</p> <p>The policy should integrate with the equivalent policy in the subdivision section (SUB- P7) so that the specific method for achieving the policy is specified in the rule rather than in the policy.</p> <p>For example, the obligation of policy PA-P2 to require the creation of esplanade reserves where it 'c. protects, maintains or enhances public access' goes beyond the limited circumstances specified in rule SUB-S8.</p>	Delete policy PA-P2 and replace with: <b>"Require esplanade reserves or strips when subdividing to specified lot sizes land adjoining the coast and other qualifying water-bodies"</b> .
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.165	Public access	PA-P2	Support	Federated Farmers supports policies PA-P1 to PA-5 as they are currently drafted in the proposed district plan.	Retain Policy PA-P2 or ensure that amendments include similar wording that achieves the same intent

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<b>Kapiro Conservation Trust (S445)</b>	S445.002	Public access	PA-P2	Support	<p>Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.</p> <p>In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section):</p> <ul style="list-style-type: none"> <li>- 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3)</li> <li>- 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3)</li> </ul>	Retain PA-P2
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)</b>	S523.011	Public access	PA-P2	Support	<p>Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.</p> <p>In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section):</p> <ul style="list-style-type: none"> <li>- 'Far North District Council (Council) requires</li> </ul>	Retain PA-P2

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3) - 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3)	
<b>Carbon Neutral NZ Trust (S529)</b>	S529.180	Public access	PA-P2	Support	Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. In particular we support - Public access policies PA-P1 to PA-P5	Retain PA-P2
<b>Te Rūnanga o Ngāti Rēhia (S559)</b>	S559.041	Public access	PA-P2	Support in part	It is unclear by just saying cultural sites of significance and could be missed out by those required to implement the policy.	Amend PA-P2 to include mahinga kai purposes and fisheries.
<b>Lynley Newport (S98)</b>	S98.003	Public access	PA-P3	Support in part	The submitter supports that the Public Access chapter deals solely with objectives and policies and contains no rules and cross references to rules relating to public access in other chapters. The submitter considers that throughout the chapter any references to esplanade reserves need to be amended to include the words esplanade strips.	Amend PA-P3 to read as follows: Allow a waiver of any requirement or a reduction in the required width of an esplanade reserve or strip where it can be demonstrated that:
<b>Our Kerikeri Community Charitable Trust (S271)</b>	S271.020	Public access	PA-P3	Oppose	The waiving of esplanade requirements is not supported. It is sought that the wording is changed to make it clear that exceptions should only occur in exceptional circumstances.	Amend PA-P3 <del>Allow a</del> <b>Consider an application for</b> waiver of any requirement <b>for</b> , or a reduction in the required width of, an esplanade reserve <b>where the area is not identified as esplanade priority, and</b> it can be demonstrated that: a. safe and reasonable public access or recreational use already exists and can be maintained for the future,

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						<p>while considering the potential effects of climate change, including sea level rise, erosion and accretion;                      b. providing access will be detrimental to land and water-based habitats of indigenous flora and fauna within, and adjoining the margin;                      c. providing access will be detrimental to any historic heritage place or site and area of significance to Māori;                      d. it would protect the stability, performance, maintenance and operation of essential structures and infrastructure; or                      e. restrictions on public access are necessary to ensure public health and safety.</p>
<p><b>Our Kerikeri Community Charitable Trust (S272)</b></p>	<p>S272.014</p>	<p>Public access</p>	<p>PA-P3</p>	<p>Support</p>	<p>Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. In particular we support - Public access policies PA-P1 to PA-P5</p> <p>PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more.                      PDP provisions that normally require esplanade reserves when consenting land use and other forms of development.                      Improve provisions relating to the esplanade</p>	<p>Retain PA-P3</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values.	
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.166	Public access	PA-P3	Support	Federated Farmers supports policies PA-P1 to PA-5 as they are currently drafted in the proposed district plan.	Retain Policy PA-P3 or ensure that amendments include similar wording that achieves the same intent
<b>Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)</b>	S425.038	Public access	PA-P3	Support in part	As a general comment the waiving of esplanade requirements is not supported by PHTTCCT . However, if such a provision must be included it is sought that the wording is changed to make it clear that this should only occur in exceptional circumstances.	amend PA-P3 <b>Allow Consider an application for</b> waiver of any requirement <b>for</b> , or a reduction in the required width of, an esplanade reserve <b>where the area is not identified as esplanade priority</b> , and it can be demonstrated that: <ul style="list-style-type: none"> <li>a. safe and reasonable public access or recreational use already exists and can be maintained for the future, while considering the potential effects of climate change, including sea level rise, erosion and accretion;</li> <li>b. providing access will be detrimental to land and water-based habitats of indigenous flora and fauna within, and adjoining the margin;</li> <li>c. providing access will be detrimental to any historic heritage place or site and area</li> </ul>

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						of significance to Māori; d. it would protect the stability, performance, maintenance and operation of essential structures and infrastructure; or restrictions on public access are necessary to ensure public health and safety.
<b>Kapiro Conservation Trust (S445)</b>	S445.003	Public access	PA-P3	Support	<p>Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.</p> <p>In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section):</p> <ul style="list-style-type: none"> <li>- 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3)</li> <li>- 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3)</li> </ul>	Retain PA-P3
<b>Kapiro Conservation Trust (S446)</b>	S446.019	Public access	PA-P3	Support in part	As a general comment the waiving of esplanade requirements is not supported. However, if such a provision must be included it	Amend PA-P3 <b>Allow Consider an application for</b> waiver of

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>is sought that the wording is changed to make it clear that this should only occur in exceptional circumstances.</p> <p>Accordingly, the following amendments are sought, noting the comment above I regards to mapping of esplanade priority.</p>	<p>any requirement <b>for</b>, or a reduction in the required width of, an esplanade reserve <b>where the area is not identified as esplanade priority</b>, and it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>a. safe and reasonable public access or recreational use already exists and can be maintained for the future, while considering the potential effects of climate change, including sea level rise, erosion and accretion;</li> <li>b. providing access will be detrimental to land and water-based habitats of indigenous flora and fauna within, and adjoining the margin;</li> <li>c. providing access will be detrimental to any historic heritage place or site and area of significance to Māori;</li> <li>d. it would protect the stability, performance, maintenance and operation of essential structures and infrastructure; or</li> <li>e. restrictions on public access are necessary to ensure public health and safety.</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)	S523.012	Public access	PA-P3	Support	<p>Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.</p> <p>In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section):</p> <ul style="list-style-type: none"> <li>- 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3)</li> <li>- 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3)</li> </ul>	Retain PA-P3
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S524)	S524.020	Public access	PA-P3	Oppose	<p>The waiving of esplanade requirements is not supported.</p> <p>It is sought that the wording is changed to make it clear that exceptions should only occur in exceptional circumstances.</p>	<p>Amend PA-P3 to <del>allow a</del> <b>Consider an application for</b> waiver of any requirement <b>for</b>, or a reduction in the required width of, an esplanade reserve <b>where the area is not identified as esplanade priority, and</b> it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>a. safe and reasonable public access or recreational use already exists and can be</li> </ul>



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>maintained for the future, while considering the potential effects of climate change, including sea level rise, erosion and accretion;</p> <p>b. providing access will be detrimental to land and water-based habitats of indigenous flora and fauna within, and adjoining the margin;</p> <p>c. providing access will be detrimental to any historic heritage place or site and area of significance to Māori;</p> <p>d. it would protect the stability, performance, maintenance and operation of essential structures and infrastructure; or</p> <p>e. restrictions on public access are necessary to ensure public health and safety.</p>
<p><b>Carbon Neutral NZ Trust (S529)</b></p>	<p>S529.085</p>	<p>Public access</p>	<p>PA-P3</p>	<p>Oppose</p>	<p>The waiving of esplanade requirements is not supported.</p> <p>It is sought that the wording is changed to make it clear that exceptions should only occur in exceptional circumstances.</p>	<p>Amend PA-P3 <del>Allow a</del> <b>Consider an application for</b> waiver of any requirement for, or a reduction in the required width of, an esplanade reserve <b>where the area is not identified as esplanade priority, and</b> it can be demonstrated that:</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>a. safe and reasonable public access or recreational use already exists and can be maintained for the future, while considering the potential effects of climate change, including sea level rise, erosion and accretion;</p> <p>b. providing access will be detrimental to land and water-based habitats of indigenous flora and fauna within, and adjoining the margin;</p> <p>c. providing access will be detrimental to any historic heritage place or site and area of significance to Māori;</p> <p>d. it would protect the stability, performance, maintenance and operation of essential structures and infrastructure; or</p> <p>e. restrictions on public access are necessary to ensure public health and safety.</p>
<b>Carbon Neutral NZ Trust (S529)</b>	S529.181	Public access	PA-P3	Support	Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. In particular we support - Public access policies PA-P1 to PA-P5	Retain PA-P3
<b>Te Rūnanga o Ngāti Rēhia (S559)</b>	S559.042	Public access	PA-P3	Support in part	N/A	Amend PA-P3 to include where it is detrimental to land in Māori title,

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						mahinga kai, and hapū fisheries.
<b>Our Kerikeri Community Charitable Trust (S272)</b>	S272.015	Public access	PA-P4	Support	<p>Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. In particular we support - Public access policies PA-P1 to PA-P5</p> <p>PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more.</p> <p>PDP provisions that normally require esplanade reserves when consenting land use and other forms of development.</p> <p>Improve provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values.</p>	Retain PA-P4
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.167	Public access	PA-P4	Support	Federated Farmers supports policies PA-P1 to PA-5 as they are currently drafted in the proposed district plan.	Retain Policy PA-P4 or ensure that amendments include similar wording that achieves the same intent
<b>Kapiro Conservation Trust (S445)</b>	S445.004	Public access	PA-P4	Support	<p>Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.</p> <p>In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section):</p> <ul style="list-style-type: none"> <li>- 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine</li> </ul>	Retain PA-P4

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					area' (p.3) - 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3)	
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)</b>	S523.013	Public access	PA-P4	Support	Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development. In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section): - 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3) - 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3)	Retain PA-P4
<b>Carbon Neutral NZ Trust (S529)</b>	S529.182	Public access	PA-P4	Support	Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. In particular we support - Public access policies PA-P1 to PA-P5	Retain PA-P4
<b>Lynley Newport (S98)</b>	S98.004	Public access	PA-P5	Support in part	The submitter supports that the Public Access chapter deals solely with objectives and policies and contains no rules and cross references to rules relating to public access in other chapters.	Amend PA-P5 as follows: Encourage the voluntary creation of esplanade reserves or strips for land use activities where it

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					The submitter considers that throughout the chapter any references to esplanade reserves need to be amended to include the words esplanade strips.	
<b>Our Kerikeri Community Charitable Trust (S272)</b>	S272.012	Public access	PA-P5	Support in part	<p>Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. In particular we support - Public access policies PA-P1 to PA-P5</p> <p>PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more.</p> <p>PDP provisions that normally require esplanade reserves when consenting land use and other forms of development.</p> <p>Improve provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values.</p>	Retain PA-P5
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.168	Public access	PA-P5	Support	Federated Farmers supports policies PA-P1 to PA-5 as they are currently drafted in the proposed district plan.	Retain Policy PA-P5 or ensure that amendments include similar wording that achieves the same intent
<b>Kapiro Conservation Trust (S445)</b>	S445.005	Public access	PA-P5	Support	<p>Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.</p> <p>In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan.</p> <p>We support the following statements in the s32 report on public access (management approach section):</p> <ul style="list-style-type: none"> <li>- 'Far North District Council (Council) requires</li> </ul>	Retain PA-R5

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3)</p> <p>- 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3)</p>	
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)</b>	S523.014	Public access	PA-P5	Support	<p>Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.</p> <p>In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section):</p> <p>- 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3)</p> <p>- 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3)</p>	Retain PA-P5
<b>Carbon Neutral NZ Trust (S529)</b>	S529.183	Public access	PA-P5	Support	<p>Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. In particular we support - Public access policies PA-P1 to PA-P5</p>	Retain PA-P5
<b>Our Kerikeri Community</b>	S271.019	Public access	Rules	Not Stated	<p>Council should take all opportunities to gain access to waterbodies, as there is always future</p>	Insert Council mapped esplanade priority layers that identify key

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Charitable Trust (S271)					potential for contributing to connectivity. There no longer appears to be an esplanade priority mapped layer. This layer can also usefully be used to encourage voluntary creation where lots of less than 4ha as a mitigation measure or off set.	areas for future connectivity purposes and include as an information layer in the District Plan.
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S524)	S524.019	Public access	Rules	Not Stated	Council should take all opportunities to gain access to waterbodies, as there is always future potential for contributing to connectivity. There no longer appears to be an esplanade priority mapped layer. This layer can also usefully be used to encourage voluntary creation where lots of less than 4ha as a mitigation measure or off set.	Insert Council mapped esplanade priority layers that identify key areas for future connectivity purposes and include as an information layer in the District Plan.
New Zealand Pork Industry Board (S55)	S55.013	Subdivision	Overview	Support	Support the acknowledgement that subdivision should not result in reverse sensitivity effects that result in the inability to undertake activities enabled in the relevant zone.	retain overview as proposed
Margaret Sheila Hulse and John Colin Hulse (S247)	S247.005	Subdivision	Overview	Support in part	The plan does not mention development contributions policy. It would be helpful to plan users to provide links to the development contributions policy. We submit that subdivision developers' fees should NOT be helped by the Council but paid solely by the-developers	Insert in the SUBOverview as follows: <b>"Council policy in regard to development contributions payable by subdividers is contained in the councils long-term Plan, separate from this district plan."</b>
Neil Construction Limited (S349)	S349.008	Subdivision	Overview	Oppose	A better outcome in these circumstances is to utilise the land more efficiently for rural residential use, adding much needed housing to Kerikeri in a way that does not impose any burden on the community in terms of providing or funding infrastructure.	delete the overview, or amend to facilitate additional rural residential subdivision in the District,
Northland Federated Farmers of New Zealand (S421)	S421.170	Subdivision	Overview	Not Stated	Federated Farmers believes that council subdivision and development policies and planning should provide for managed growth in rural communities. While acknowledging that the loss of productive land can impact on the region's economy, there is also a need to recognise that farmers undertake small lot subdivision to provide for farm succession,	Amend the Overview to: <ul style="list-style-type: none"> <li>acknowledge the need to provide a framework for the managed growth of rural communities; and</li> <li>expand the issue of reverse sensitivity in the</li> </ul>

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					dispose of surplus dwellings and for providing on-farm accommodation for employees. There should also needs to be acknowledgement that considered well managed growth in rural communities provides for diversity and vibrancy in rural areas, sustains essential community infrastructure, and provides employment flexibility and opportunities. One major concern with subdivision in rural areas is the issue of reverse sensitivity. Rural residential activities are often incompatible with rural production activities. Federated Farmers advocates for reverse sensitivity protection for rural land use so that the introduction of residential activities in rural areas will not negatively impact on the current use of rural land for production purposes. Federated Farmers wants to ensure that any objectives, policies, and relevant rules consider and mitigate the potential for reverse sensitivity issues to arise, where practical.	rural environment so that it is addressed in detail and clearly sets out why the issue needs to be acknowledged and addressed;
<b>Ministry of Education Te Tāhuhu o Te Mātauranga (S331)</b>	S331.049	Subdivision	Objectives	Not Stated	The submitter requests that a new objective be provided for educational facilities or additional infrastructure to ensure that the impact of population growth on the provision of educational facilities is considered in the location and sequencing of developments.	Insert a new objective SUB-O5, as follows: <b>Subdivision occurs in a sequenced and coherent manner in locations and at a rate that: a. enables growth and development to be supported by additional infrastructure.</b>
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.076	Subdivision	Objectives	Support	Suggest adding a new objective that seeks to support the provision and maintenance of infrastructure and ensure that policies and rules are amended appropriately.	Insert new objective: <b>Subdivision and subsequent development provides for the efficient and timely provision of infrastructure and services.</b>



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<b>Northland Regional Council (S359)</b>	S359.029	Subdivision	Objectives	Support in part	We recommend objectives and policies in the subdivision section be strengthened to strongly discourage fragmentation of rural land as this can limit the viability of surrounding farming units and lead to high costs to service these developments. This is of particular concern for highly productive soils and should be based on the provisions in the NPS-HPL. The Regional Policy Statement for Northland does not fully reflect the direction in the NPS-HPL with regard to the protection of productive land. Therefore, it is considered appropriate to take direction from the NPS-HPL	Amend the objectives to strongly discourage fragmentation of rural land.
<b>Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)</b>	S425.039	Subdivision	Objectives	Support in part	In general, PHTTCCT support well-connected development, and future transport networks (see sub#4) being provided at the time of subdivision. Given the lack of spatial planning incorporated into the plan, it is considered that requiring developers to show how any future transport networks will be accommodated by the development is critical to future proof the District and ensure an integrated well connected transport network. Depending on the scale of development this could include requiring setbacks from indicative roads/cycleways as shown/described in any future or existing) strategies/spatial plans/annual plan be provided, or road connections provided at boundaries of the developments.	Amend the subdivision chapter to ensure that provision for, and connectivity with future transport networks is demonstrated at subdivision
<b>Kapiro Residents Association (S428)</b>	S428.012	Subdivision	Objectives	Support in part	It should be encouraged in the form of well-designed two or three storey buildings, for example, with requirements for permeable open areas including garden/landscaped ground. Developments should use permeable materials wherever feasible for surfaces such as driveways, paths.  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	Amend PDP to include objectives, policies and rules/standards that require best practice environmentally sustainable techniques for new developments, including - <ul style="list-style-type: none"> <li>• Permeable materials wherever feasible for surfaces such as driveways, paths etc.</li> <li>• Best practice for lowest environmental impact</li> </ul>

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					<p>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.</p> <p>Passive heating and cooling designs, for example, reduce energy consumption and the on-going costs of heating/cooling. Solar panels with batteries, for example, can be purchased on lease-to-buy schemes so that the owner/occupier only pays the amount that they would have paid anyway for grid electricity. Additional electricity generation by households will be essential for powering EVs in future because current national generation capacity is not sufficient.</p>	<p>and water sensitive designs, requiring greywater recycling techniques and other technologies to ensure efficient use of water, rain storage tanks for properties connected to a public water supply, additional water storage for buildings that rely solely on roof water (to cope with drought), and other measures</p> <ul style="list-style-type: none"> <li>• Renewable energy technologies and energy-efficient technologies, and similar requirements that foster improved environmental design/technologies and lower lifecycle climate impacts</li> <li>• Specified area (percentage) of tree canopy cover and green corridors should be required within new subdivisions. These will be increasingly important for shade/cooling for buildings and pedestrians in future.</li> </ul>
<p><b>John Andrew Riddell (S431)</b></p>	<p>S431.067</p>	<p>Subdivision</p>	<p>Objectives</p>	<p>Not Stated</p>	<p>Well designed subdivision is an important component of achieving sustainable use and development of natural and physical resources, and in establishing and continuing character and sense of place.</p> <p>There is an inappropriate emphasis on ensuring that vehicle requirements and needs are provided for in the subdivision rules. In urban</p>	<p>Amend the objectives, policies and provisions to better provide for cycling and active transport and walking in urban areas, settlements and their surrounds</p>

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					areas and settlements and in their surrounds good resource management practice is for increased provision for cycling and other active transport and for walking access. Indeed, this is a necessary measure to help mitigate and adapt to the effects of climate change.	
<b>Fire and Emergency New Zealand (S512)</b>	S512.028	Subdivision	Objectives	Support	Fire and Emergency support the subdivision policy framework to the extent that subdivision should have the infrastructure appropriate for the intended use of the land (SUB-O3).	retain objectives
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S521)</b>	S521.015	Subdivision	Objectives	Support in part	<p>It should be encouraged in the form of well-designed two or three storey buildings, for example, with requirements for permeable open areas including garden/landscaped ground. Developments should use permeable materials wherever feasible for surfaces such as driveways, paths.</p> <p>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.</p> <p>Passive heating and cooling designs, for</p>	<p>Amend PDP to include objectives, policies and rules/standards that require best practice environmentally sustainable techniques for new developments, including -</p> <ul style="list-style-type: none"> <li>• Permeable materials wherever feasible for surfaces such as driveways, paths etc.</li> <li>• Best practice for lowest environmental impact and water sensitive designs, requiring greywater recycling techniques and other technologies to ensure efficient use of water, rain storage tanks for properties connected to a public water supply, additional water storage for buildings that rely solely on roof water (to cope with drought), and other measures</li> <li>• Renewable energy technologies and energy-efficient technologies, and similar requirements</li> </ul>

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					<p>example, reduce energy consumption and the on-going costs of heating/cooling. Solar panels with batteries, for example, can be purchased on lease-to-buy schemes so that the owner/occupier only pays the amount that they would have paid anyway for grid electricity. Additional electricity generation by households will be essential for powering EVs in future because current national generation capacity is not sufficient.</p>	<p>that foster improved environmental design/technologies and lower lifecycle climate impacts</p> <ul style="list-style-type: none"> <li>Specified area (percentage) of tree canopy cover and green corridors should be required within new subdivisions. These will be increasingly important for shade/cooling for buildings and pedestrians in future.</li> </ul>
<p><b>Carbon Neutral NZ Trust (S529)</b></p>	<p>S529.219</p>	<p>Subdivision</p>	<p>Objectives</p>	<p>Support in part</p>	<p>It should be encouraged in the form of well-designed two or three storey buildings, for example, with requirements for permeable open areas including garden/landscaped ground. Developments should use permeable materials wherever feasible for surfaces such as driveways, paths.</p> <p>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-</p>	<p>Amend PDP to include objectives, policies and rules/standards that require best practice environmentally sustainable techniques for new developments, including -</p> <ul style="list-style-type: none"> <li>Permeable materials wherever feasible for surfaces such as driveways, paths etc.</li> <li>Best practice for lowest environmental impact and water sensitive designs, requiring greywater recycling techniques and other technologies to ensure efficient use of water, rain storage tanks for properties connected to a public water supply, additional water storage for buildings that rely solely on roof water (to</li> </ul>

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					<p>saving measures would also reduce future Council infrastructure costs for additional water supplies and wastewater.</p> <p>Passive heating and cooling designs, for example, reduce energy consumption and the on-going costs of heating/cooling. Solar panels with batteries, for example, can be purchased on lease-to-buy schemes so that the owner/occupier only pays the amount that they would have paid anyway for grid electricity. Additional electricity generation by households will be essential for powering EVs in future because current national generation capacity is not sufficient.</p>	<p>cope with drought), and other measures</p> <ul style="list-style-type: none"> <li>Renewable energy technologies and energy-efficient technologies, and similar requirements that foster improved environmental design/technologies and lower lifecycle climate impacts</li> <li>Specified area (percentage) of tree canopy cover and green corridors should be required within new subdivisions. These will be increasingly important for shade/cooling for buildings and pedestrians in future.</li> </ul>
<b>New Zealand Pork Industry Board (S55)</b>	S55.015	Subdivision	SUB-O1	Support	Support the objective to avoid reverse sensitivity issues that would prevent or adversely affect activities already established on land from continuing to operate. However, this objective is not supported by clear policies or rules to give effect to this statement in rural areas	Retain as proposed.
<b>Lynley Newport (S101)</b>	S101.001	Subdivision	SUB-O1	Support in part	The Council is proposing zoning in some areas where the already existing land use pattern is contrary to achieving the objectives and policies of the zone in the land is located. For example, Rural Production zoning applying to an area where the land use pattern and lot sizes is no longer able to be utilised for productive purposes and where reverse sensitivity issues already exist. So rather than have parts (c) and (d) talk of 'avoiding' something that already exists and therefore automatically triggering inconsistency with the Objective no matter what subdivision is proposed, the existing situation should be acknowledged and the Objective aimed more at	Amend SUB-O1, parts (c) and (d) as follows: <b>c) does not significantly increase</b> the risk of reverse sensitivity issues that would prevent or adversely affect activities already established on land from continuing to operate, <b>d) does not significantly increase</b> the risk of the land

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					not materially adding to the issues raised. The word 'Avoid' seriously limits the ability to balance effects and achieve sustainable management of natural and physical resources. The point being made here is that there is already land unable to be used in a way that achieved the zones objectives and policies, and to put it bluntly, if this is the case, there should be no impediment to subdividing further.	not being able to be used in a manner consistent with the zone's objectives and policies.
<b>Horticulture New Zealand (S159)</b>	S159.065	Subdivision	SUB-O1	Support	Avoiding reverse sensitivity effects is supported	Retain Objective SUB-O1
<b>Russell Protection Society (INC) (S179)</b>	S179.090	Subdivision	SUB-O1	Support		Retain objective SUB-O1
<b>Denis Thomson (S201)</b>	S201.001	Subdivision	SUB-O1	Oppose	<p>The Council is proposing zoning in some areas where the already existing land use pattern is contrary to achieving the objectives and policies of the zone in the land is located. For example, Rural Production zoning applying to an area where the land use pattern and lot size is no longer able to be utilised for productive purposes and where reverse sensitivity issues already exist. So rather than have parts (c) and (d) talk of 'avoiding' something that already exists and therefore automatically triggering inconsistency with the Objective no matter what subdivision is proposed, the existing situation should be acknowledged and the Objective aimed more at not materially adding to the issues raised. The word "avoid" should not be used in an objective in any event as an objective is just that - an overall objective and using a word like "avoid" seriously limits the ability to balance effects and achieve sustainable management of natural and physical resources.</p> <p>The point being made here is that there is already land unable to be used in a way that achieves the zone's objectives and policies, and</p>	<p>Amend SUB-O1,parts (c) and (d) as follows:</p> <p><i>"c. does not significantly increase</i> the risk of reverse sensitivity issues that would prevent or adversely affect activities already established on land from continuing to operate;</p> <p><b>"d. does not significantly increase</b> the risk of the land not being able to used in a manner consistent with the zone's objectives and policies."</p>

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					to put it bluntly, if this is the case, there should be no impediment to subdividing it further.	
<b>Margaret Sheila Hulse and John Colin Hulse (S247)</b>	S247.003	Subdivision	SUB-O1	Support in part	<p>We are concerned that no further residential subdivisions should be approved before there is enough medical infrastructure within Kerikeri and Waipapa areas to support extra families living here.</p> <p>Our chief concern is that the local GP practices have closed their books to new patients, and with more people being allowed to settle here they will not be covered with adequate medical facilities should they need it, despite being to the contrary; A number of local residents have agreed with us that this is an ongoing issue which will get worse if not addressed</p>	Amend SUB-O1 by adding a new paragraph to read: .g) avoid subdivision for residential development in areas where primary medical care services are available adequate to support the wellbeing, health and safety of additional people.."
<b>Neil Construction Limited (S349)</b>	S349.009	Subdivision	SUB-O1	Oppose	A better outcome in these circumstances is to utilise the land more efficiently for rural residential use, adding much needed housing to Kerikeri in a way that does not impose any burden on the community in terms of providing or funding infrastructure.	delete SUB-O1, or amend to facilitate additional rural residential subdivision in the District
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.072	Subdivision	SUB-O1	Support in part	<p>Waka Kotahi supports the intent but considers the objective could be more clearly articulated. For example, it is not entirely clear the difference between subclause (a) and (d). It is also unclear whether by meeting (a)-(f) if this then constitutes an "efficient use of land". For example, subclause (b) appears to be out of place and may therefore be better deleted.</p> <p>If a residential/mixed use subdivision were to be considered in this context, this should demonstrate good accessibility for people between housing, jobs, community services, natural spaces, and open spaces, including by way of active and/or public transport where practicable.</p>	Amend to provide better clarity on what constitutes "efficient use of land", including consideration of residential/mixed use subdivisions having good accessibility for people between housing, jobs, community services, natural spaces, and open spaces, including by way of active and public transport where practicable.
<b>KiwiRail Holdings Limited (S416)</b>	S416.035	Subdivision	SUB-O1	Support in part	KiwiRail support that subdivision should avoid the creation of reverse sensitivity effects on land. Subdivision and associated land use development that subdivision enables can result in compromises to the safe operation of the rail network or public safety is not appropriately	Insert additional point in Objective SUB-O1 as follows: <b>Maintains the safety and efficiency of the transport network</b>

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					designed and mitigated. A small amendment to the clause is proposed to clarify this.	
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.171	Subdivision	SUB-O1	Support	Federated Farmers supports the objectives SUB-O1 to SUB-O4 as they are drafted in the proposed district plan. In particular we support the recognition of highly productive land and the reverse sensitivity issues that arise from subdivision in rural areas.	Retain Objective SUB-O1 or ensure that amendments include similar wording that achieves the same intent
<b>Waiaua Bay Farm Limited (S463)</b>	S463.041	Subdivision	SUB-O1	Oppose	The drafting of sub-clause (b) of this objective could not be applied to situations where local character and sense of place are intended to change over time as a result of subdivision activity anticipated by the Plan. Special Purpose Zones (such as the KCZ) are locations where subdivision and subsequent development must deliver a "planned" outcome. It is incongruous in WBF's view, to require subdivision of the scale anticipated in the KCZ to maintain the status quo "character and sense of place". Rather, it will deliver a preferred outcome that integrates with the existing environment rather than leaving it unchanged. Sub-clause (c) requires refinement for brevity.	Amend Objective SUB-O1 as follows: SUB-O1 Subdivision results in the efficient use of land, which: a. achieves the objectives of each relevant zone, overlays, and district wide provisions; b. contributes to the <b>existing or planned</b> local character and sense of place <b>including that required to be delivered by subdivision in the Special Purpose Zones</b> ; c. avoids reverse sensitivity issues that would prevent or adversely affect <b>existing</b> activities <del>already established on land</del> from continuing to operate; <del>d. avoids land use with patterns which would prevent land from achieving the objectives and policies of the zone in which it is located;</del> e. <del>does not increase risk from natural hazards or risks are mitigates</del> <b>managed natural hazard risks and reduces</b>



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						existing risks where practicable reduced; and f. manages adverse effects on the environment.
<b>Kiwi Fresh Orange Company Limited (S554)</b>	S554.007	Subdivision	SUB-O1	Support	KFO supports the objective as it promotes the efficient use of land	Retain objective as notified
<b>Martin John Yuretich (S40)</b>	S40.004	Subdivision	SUB-O2	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 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> </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>
<p><b>Joel Vieviorka (S41)</b></p>	<p>S41.004</p>	<p>Subdivision</p>	<p>SUB-O2</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.</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 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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Paul O'Connor (S49)	S49.004	Subdivision	SUB-O2	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 an ecologist at their expense. It is not fair to assume all bush is under SNA unless proven otherwise.	Amend to provide a simple bush protection covenant by consent notice, instead of just the Reserves Act and QEII covenants
Strand Homes Ltd/Okahu Developments Ltd (S77)	S77.003	Subdivision	SUB-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 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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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>
<p><b>Trevor John Ashford (S146)</b></p>	<p>S146.004</p>	<p>Subdivision</p>	<p>SUB-O2</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.</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 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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						<ul style="list-style-type: none"> <li>Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<b>Horticulture New Zealand (S159)</b>	S159.066	Subdivision	SUB-O2	Support	Protection of highly productive land is supported.	Retain Objective SUB-O2
<b>Shanon Garton (S161)</b>	S161.003	Subdivision	SUB-O2	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 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</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>Russell Protection Society (INC) (S179)</b>	S179.091	Subdivision	SUB-O2	Support		Retain objective SUB-O2
<b>Te Hiku Community Board (S257)</b>	S257.007	Subdivision	SUB-O2	Oppose	We do not support the large title sizes in the rural zone. We submit that subdivision should allow lots to 4ha or smaller, and that the subdivision of smaller lots around existing houses be provided for.	Delete paragraph a) of SUB-O2, so that protection of highly productive land is not an objective of subdivision.
<b>Sapphire Surveyors Limited (S348)</b>	S348.010	Subdivision	SUB-O2	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 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</li> </ul>

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						<p>covenant by consent notice if owners wish to protect their bush, 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>Neil Construction Limited (S349)</b>	S349.010	Subdivision	SUB-O2	Oppose	A better outcome in these circumstances is to utilise the land more efficiently for rural residential use, adding much needed housing to Kerikeri in a way that does not impose any burden on the community in terms of providing or funding infrastructure.	delete SUB-O2, or amend to facilitate additional rural residential subdivision in the District
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.073	Subdivision	SUB-O2	Support	not stated	Retain SUB-O2 as notified
<b>Sean Frieling (S357)</b>	S357.007	Subdivision	SUB-O2	Oppose	<p>The new subdivision rules will severely restrict the ability to create small rural lots in the rural production zone.</p> <p>The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and the less productive land when it comes to subdivision.</p> <p>It is correct to protect rural productive potential, but this can be achieved without imposing a total restriction on rural lifestyle properties. We do not support the large title sizes in the rural zone. We submit that subdivision should allow lots to 4ha or smaller, and that the subdivision of smaller lots around existing houses be provided for.</p>	Delete paragraph a) of SUB-O2, so that protection of highly productive land is not an objective of subdivision.
<b>Sean Frieling (S357)</b>	S357.033	Subdivision	SUB-O2	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	Acknowledge that ratepayers have managed to enhance the SNA in the District, facilitate and assist them in what they are already doing.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					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.	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>Leah Frieling (S358)</b>	S358.007	Subdivision	SUB-O2	Oppose	The majority of land in the District is not classified as highly productive. The District Plan does not distinguish between highly productive land and less productive land when it comes to subdivision. Delete paragraph a) of Objective SUB-O2, so that protection of highly productive land is not an objective of subdivision.	Delete paragraph a) of Objective SUB-O2
<b>Director-General of Conservation (Department of Conservation) (S364)</b>	S364.053	Subdivision	SUB-O2	Support in part	The Director-General supports the intention of Objective SUB-O2, however considers 'clause a' dilutes the objective which should recognise and provide for the matters of national importance. Highly productive land is not a matter of national importance under section 6 of the RMA.	Amend Objective SUB-O2 as follows: Subdivision <b>recognises and provides for the:</b> <del>a. Protection of highly productive land;</del> and b. Protection, restoration or enhancement of Outstanding Natural Features, Outstanding Natural Landscapes, Natural Character of the Coastal Environment, areas of High Natural Character, Outstanding Natural Character, wetland, lake and river margins, Significant Natural Areas, Sites and areas of Significance to Māori, and



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						Historic Heritage.
<b>Rua Hatu Trust (S377)</b>	S377.004	Subdivision	SUB-O2	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 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> <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>Sean Jozef Vercammen (S395)</b>	S395.004	Subdivision	SUB-O2	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 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> <li>• Make SNA mapping available publicly, even if it is not part of the PDP</li> </ul>
<b>Kerry-Anne Smith (S410)</b>	S410.004	Subdivision	SUB-O2	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</p>	<p>Amend to:</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>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 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>Roger Myles Smith (S411)</b></p>	<p>S411.004</p>	<p>Subdivision</p>	<p>SUB-O2</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</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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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>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>Northland Federated Farmers of New Zealand (S421)</b></p>	<p>S421.172</p>	<p>Subdivision</p>	<p>SUB-O2</p>	<p>Support</p>	<p>Federated Farmers supports the objectives SUB-O1 to SUB-O4 as they are drafted in the proposed district plan. In particular we support the recognition of highly productive land and the reverse sensitivity issues that arise from subdivision in rural areas.</p>	<p>Retain Objective SUB-O2 or ensure that amendments include similar wording that achieves the same intent</p>
<p><b>John Joseph and Jacqueline Elizabeth</b></p>	<p>S439.004</p>	<p>Subdivision</p>	<p>SUB-O2</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</p>	<p>Amend Objective SUB-O2:</p> <ul style="list-style-type: none"> <li>• to acknowledge that ratepayers have managed to enhance the</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Matthews (S439)</b>					<p>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 the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	<p>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>• 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>	S442.148	Subdivision	SUB-02	Support in part	Objective SUB-02 (b) states that subdivision provides for the protection of "significant natural areas". It is unclear what this means, as the plan does not include any SNAs in Schedule 4.	Amend Objective SUB-02 (b) to clarify that areas that contain significant indigenous vegetation and significant habitats for indigenous fauna are to be protected.
<b>Pacific Eco-Logic (S451)</b>	S451.004	Subdivision	SUB-02	Support in part	Objective SUB-02 (b) states that subdivision provides for the protection of "significant natural areas". It is unclear what this means, as the plan does not include any SNAs in Schedule 4	Amend Objective SUB-02 (b) to clarify that areas that contain significant indigenous vegetation and significant habitats for indigenous fauna are to be protected

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LJ King Ltd (S464)	S464.004	Subdivision	SUB-O2	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 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> <li>Make SNA mapping available publicly, even if it is not part of the PDP</li> </ul>
LJ King Ltd (S464)	S464.018	Subdivision	SUB-O2	Oppose	<p>The amendment is so the protection of highly productive land is not an objective of subdivision.</p>	<p>Amend SUB-O2 as follows: Subdivision provides for the: <del>a-</del> <b>Protection of highly</b></p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						productive land; and b. a. Protection, restoration or enhancement of Outstanding Natural Features, Outstanding Natural Landscapes, Natural Character of the Coastal Environment, Areas of High Natural Character, Outstanding Natural Character, wetland, lakes and river margins, Significant Natural Areas, Sites and Areas of Significance to Māori, and Historic Heritage.
<p><b>Helmut Friedrich Paul Letz and Angelika Eveline Letz (S470)</b></p>	S470.004	Subdivision	SUB-O2	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 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</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>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>
<b>Michael Foy (S472)</b>	S472.007	Subdivision	SUB-O2	Support in part		Delete paragraph a) of SUB-O2, so that protection of highly productive land is not an objective of subdivision
<b>Michael Foy (S472)</b>	S472.041	Subdivision	SUB-O2	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 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</li> </ul>



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>landowners 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>Top Energy Limited (S483)</b></p>	<p>S483.163</p>	<p>Subdivision</p>	<p>SUB-O2</p>	<p>Not Stated</p>	<p>Top Energy seeks to ensure that existing electricity infrastructure is not compromised. As noted in the memo provided to Council dated 20th September 2021, given the regional significance of most of the electricity infrastructure network, protection of this infrastructure</p>	<p>Insert point c in Objective SUB-O2 as follows (or to the same effect): Subdivision provides for the:</p> <p>a....</p> <p>b. Protection, restoration or enhancement of Outstanding Natural Features, Outstanding Natural Landscapes, Natural Character of the Coastal Environment, Areas of High Natural Character, Outstanding Natural Character, wetland, lake and river margins, Significant Natural Areas, Sites and Areas of Significance to Māori, <b>and</b> Historic Heritage; and</p> <p><b>c. Electricity infrastructure network</b></p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Elbury Holdings (S485)	S485.019	Subdivision	SUB-O2	Oppose	That protection of highly productive land is not an objective of subdivision.	Delete paragraph a) of SUB-O2.
Elbury Holdings (S485)	S485.043	Subdivision	SUB-O2	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 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> <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
Elbury Holdings (S519)	S519.019	Subdivision	SUB-O2	Oppose	That protection of highly productive land is not an objective of subdivision.	Delete paragraph a) of SUB-O2.
Elbury Holdings (S519)	S519.043	Subdivision	SUB-O2	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 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> <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>Elbury Holdings (S541)</b>	S541.004	Subdivision	SUB-O2	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 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> <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>Elbury Holdings (S541)</b>	S541.017	Subdivision	SUB-O2	Oppose	That protection of highly productive land is not an objective of subdivision.	Delete paragraph a) of SUB-O2.
<b>LJ King Limited (S543)</b>	S543.004	Subdivision	SUB-O2	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 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>LJ King Limited (S543)</b>	S543.018	Subdivision	SUB-O2	Oppose	The amendment is so the protection of highly productive land is not an objective of subdivision	Delete paragraph a) of SUB-O2.
<b>Kelvin Richard Horsford (S544)</b>	S544.004	Subdivision	SUB-O2	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 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>
<p><b>LJ King Limited (S547)</b></p>	<p>S547.004</p>	<p>Subdivision</p>	<p>SUB-O2</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.</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 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> <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>LJ King Limited (S547)</b>	S547.018	Subdivision	SUB-O2	Oppose	The amendment is so the protection of highly productive land is not an objective of subdivision	Delete paragraph a) of SUB-O2.
<b>Rodney S Gates and Cherie R Gates (S569)</b>	S569.004	Subdivision	SUB-O2	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 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> <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>Kairos Connection Trust and Habitat for Humanity Northern Region Ltd (S138)</b>	S138.007	Subdivision	SUB-O3	Support in part	It is not clear from objective SUB-03 if the responsibility to provide infrastructure at the time of subdivision lies with the developer or the Council. In urban reticulated environments, provision of the necessary connections and coordination of infrastructure services for 'Plan enabled' development is the responsibility of the Council.	Amend Objective SUB-03 to clarify what is meant by 'infrastructure should be provided in an integrated, efficient, coordinated and future proofed manner at the time of subdivision'.
<b>Terra Group (S172)</b>	S172.004	Subdivision	SUB-O3	Support	Support this objective, noting the importance of a planned infrastructure network.	Retain as notified (inferred)
<b>Russell Protection Society (INC) (S179)</b>	S179.092	Subdivision	SUB-O3	Support		Retain objective SUB-O3
<b>Our Kerikeri Community Charitable Trust (S271)</b>	S271.021	Subdivision	SUB-O3	Support	Ensuring integrated provision of infrastructure (which includes cycle ways) development at the time of subdivision is supported	Retain as notified (inferred)
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.074	Subdivision	SUB-O3	Support in part	Support subject to strengthening clause (b) to ensure new transport infrastructure is connected to the wider network.	Amend objective as follows: SUB-O3 Infrastructure is planned to service the proposed subdivision and development where: a. there is existing infrastructure connection, infrastructure <del>should</del> <b>is</b> provided in an integrated, efficient, coordinated and future-proofed manner at the time of subdivision; and b. where no existing connection is available infrastructure <del>should be</del> <b>is</b> planned and <del>consideration be given to</del> <b>connections made</b> with the wider infrastructure network.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.173	Subdivision	SUB-O3	Support	Federated Farmers supports the objectives SUB-O1 to SUB-O4 as they are drafted in the proposed district plan. In particular we support the recognition of highly productive land and the reverse sensitivity issues that arise from subdivision in rural areas.	Retain Objective SUB-O3 or ensure that amendments include similar wording that achieves the same intent
<b>Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)</b>	S425.043	Subdivision	SUB-O3	Support	Ensuring integrated provision of infrastructure (which includes cycle ways) development at the time of subdivision is supported	Retain as notified.
<b>Kapiro Conservation Trust (S446)</b>	S446.023	Subdivision	SUB-O3	Support	Ensuring integrated provision of infrastructure (which includes cycle ways) development at the time of subdivision is supported	Retain SUB-O3 (inferred)
<b>Top Energy Limited (S483)</b>	S483.164	Subdivision	SUB-O3	Not Stated	Top Energy supports the requirement for infrastructure as part of subdivision.	Retain Objective SUB-O3
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S522)</b>	S522.034	Subdivision	SUB-O3	Support in part	Having relevant infrastructure in place should be a prerequisite for future development. The provision of necessary infrastructure must be high priority in PDP policies/rules. Given the Council's funding constraints, we consider that developers should normally be required to provide the necessary infrastructure, including items such as on-site community wastewater systems	Amend Objective SUB-O3 to emphasise the requirement for developer input for infrastructure servicing private land use and subdivision
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S524)</b>	S524.021	Subdivision	SUB-O3	Support	Ensuring integrated provision of infrastructure (which includes cycle ways) development at the time of subdivision is supported	Retain as notified (inferred)
<b>Carbon Neutral NZ Trust (S529)</b>	S529.011	Subdivision	SUB-O3	Support in part	Having relevant infrastructure in place should be a prerequisite for future development. The provision of necessary infrastructure must be high priority in PDP policies/rules. Given the Council's funding constraints, we consider that developers should normally be required to provide the necessary infrastructure, including items such as on-site community wastewater systems	Amend Objective SUB-O3 to emphasise the requirement for developer input for infrastructure servicing private land use and subdivision

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Carbon Neutral NZ Trust (S529)</b>	S529.086	Subdivision	SUB-O3	Support	Ensuring integrated provision of infrastructure (which includes cycle ways) development at the time of subdivision is supported	Retain as notified (inferred)
<b>Kiwi Fresh Orange Company Limited (S554)</b>	S554.008	Subdivision	SUB-O3	Support	KFO supports the objective as it provides for an opportunity to develop land where there is no current reticulated system available, and an on-site solution is achievable.	Retain objective as notified
<b>Kāinga Ora Homes and Communities (S561)</b>	S561.045	Subdivision	SUB-O3	Support in part	Any new growth needs to be supported by the necessary infrastructure to enable any urban area to function.	Amend SUB-O3 as follows: Infrastructure is <b>existing and / or</b> 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 infrastructure network.
<b>Russell Protection Society (INC) (S179)</b>	S179.093	Subdivision	SUB-O4	Support		Retain objective SUB-O4
<b>Our Kerikeri Community Charitable Trust (S271)</b>	S271.022	Subdivision	SUB-O4	Support in part	Not stated	Amend SUB-O4. Subdivision is accessible, connected, and integrated with the surrounding environment <b>including</b> providing for: <b>A.</b>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p><b>future connectivity for pedestrians, cyclist</b></p> <p><b>B. new, and connection to existing</b>, public open spaces;</p> <p>C. esplanade where land adjoins the coastal marine area; and</p> <p>D. esplanade where land adjoins other qualifying waterbodies</p>
<b>Our Kerikeri Community Charitable Trust (S272)</b>	S272.002	Subdivision	SUB-O4	Support	<p>Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. In particular, we support Subdivision SUB-O4, SUB-P7 and SUB-S8.</p> <p>PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more.</p> <p>PDP provisions that normally require esplanade reserves when consenting land use and other forms of development.</p> <p>Improve provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values.</p>	Retain SUB-O4
<b>Our Kerikeri Community Charitable Trust (S272)</b>	S272.018	Subdivision	SUB-O4	Support in part	<p>In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System.</p> <p>s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present.</p>	Amend SUB-O4 (inferred) relating to esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values	
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.075	Subdivision	SUB-O4	Support in part	Support subject to the inclusion of a reference to transport connections within the sub-clauses to add clarity and better ensure subdivision design appropriate considers transport connectivity.	Amend objective as follows: Subdivision is accessible, connected, and integrated with the surrounding environment and provides for: <b>a. Safe transport connections including active modes and public transport where practicable.</b> a. public open spaces; b. esplanade where land adjoins the coastal marine area; and c. esplanade where land adjoins other qualifying waterbodies.
<b>Director- General of Conservation (Department of Conservation ) (S364)</b>	S364.054	Subdivision	SUB-O4	Support	The Director-General supports Objective SUB-O4	Retain Objective SUB-O4
<b>Te Hiku Iwi Development Trust (S399)</b>	S399.066	Subdivision	SUB-O4	Not Stated	Many blocks of Māori land are land locked and are not able to be accessed. This reduces their ability to be developed and contribute to the economic development of tangata whenua and the district. This can be addressed in a minor way at the time adjoining land is subdivided by ensuring access is provided as part of that development.	Insert new point d. in Objective SUB-O4 as follows: <b>d. enabling and maintaining access to land locked allotments</b> Alternatively this may be able to be addressed in the Māori

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						Purpose Section
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.174	Subdivision	SUB-O4	Support	Federated Farmers supports the objectives SUB-O1 to SUB-O4 as they are drafted in the proposed district plan. In particular we support the recognition of highly productive land and the reverse sensitivity issues that arise from subdivision in rural areas.	Retain Objective SUB-O4 or ensure that amendments include similar wording that achieves the same intent
<b>Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)</b>	S425.044	Subdivision	SUB-O4	Support in part	Ensuring integrated transport planning which includes multi modal solutions, and provides for future connectivity is considered to be a critical component to establishing a coordinated response to land use development and good urban design outcomes. PHTTCCT consider that it is appropriate to establish these connections at time of subdivision	Seek the following amendment to SUB-O4: "Subdivision is accessible, connected, and integrated with the surrounding environment <b>including by and provides</b> providing for: <b>A. future connectivity for pedestrians, cyclist</b> <b>B. new, and connection to existing,</b> public open spaces; C. esplanade where land adjoins the coastal marine area; and esplanade where land adjoins other qualifying waterbodies."
<b>Kapiro Conservation Trust (S445)</b>	S445.006	Subdivision	SUB-O4	Support	Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.  In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32	Retain SUB-O4

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>report on public access (management approach section):</p> <ul style="list-style-type: none"> <li>- 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3)</li> <li>- 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3)</li> </ul>	
<b>Kapiro Conservation Trust (S445)</b>	S445.022	Subdivision	SUB-O4	Support in part	<p>In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System.</p> <p>s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present.</p> <p>PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values</p>	Amend SUB-O4 (inferred) relating to esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values
<b>Kapiro Conservation Trust (S446)</b>	S446.024	Subdivision	SUB-O4	Support in part		<p>Amend SUB-O4.</p> <p>Subdivision is accessible, connected, and integrated with the surrounding environment <del>including by and provides</del> providing for:</p> <ul style="list-style-type: none"> <li>A. <b>future connectivity for pedestrians, cyclist</b></li> <li>B. <b>new, and connection to existing, public open spaces;</b></li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						C. esplanade where land adjoins the coastal marine area; and D. esplanade where land adjoins other qualifying waterbodies
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)</b>	S523.002	Subdivision	SUB-O4	Support	<p>Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.</p> <p>In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section):</p> <ul style="list-style-type: none"> <li>- 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3)</li> <li>- 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3)</li> </ul>	Retain SUB-O4
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)</b>	S523.021	Subdivision	SUB-O4	Support in part	<p>In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System.</p> <p>s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise</p>	Amend SUB-O4 (inferred) relating to esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present.</p> <p>PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values</p>	ecological values
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S524)</b>	S524.022	Subdivision	SUB-O4	Support in part	not stated	<p>Amend SUB-O4. Subdivision is accessible, connected, and integrated with the surrounding environment</p> <p><b>including providing for:</b></p> <p><b>A. future connectivity for pedestrians, cyclist</b></p> <p><b>B. new, and connection to existing, public open spaces;</b></p> <p><b>C. esplanade where land adjoins the coastal marine area; and</b></p> <p><b>D. esplanade where land adjoins other qualifying waterbodies</b></p>
<b>Carbon Neutral NZ Trust (S529)</b>	S529.057	Subdivision	SUB-O4	Support	<p>Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. In particular, we support Subdivision SUB-O4, SUB-P7 and SUB-S8.</p> <p>PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more.</p> <p>PDP provisions that normally require esplanade reserves when consenting land use and other forms of development.</p> <p>Improve provisions relating to the esplanade reserves to include clauses that will actively</p>	Retain SUB-O4

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values.	
<b>Carbon Neutral NZ Trust (S529)</b>	S529.087	Subdivision	SUB-O4	Not Stated	Not stated	Amend SUB-O4. Subdivision is accessible, connected, and integrated with the surrounding environment <b>including by and provides</b> providing for: <b>A. future connectivity for pedestrians, cyclist</b> <b>B. new, and connection to existing</b> , public open spaces; C. esplanade where land adjoins the coastal marine area; and D. esplanade where land adjoins other qualifying waterbodies
<b>Carbon Neutral NZ Trust (S529)</b>	S529.188	Subdivision	SUB-O4	Support in part	In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System. s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present. PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values	Amend provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>New Zealand Pork Industry Board (S55)</b>	S55.014	Subdivision	Policies	Oppose	Support the acknowledgement that subdivision should not result in reverse sensitivity effects that result in the inability to undertake activities enabled in the relevant zone. However, this acknowledgement is not supported by clear policies or rules to give effect to this statement in the rural zones	Amend policies to give effect to reverse sensitivity protection described in the overview.
<b>New Zealand Pork Industry Board (S55)</b>	S55.016	Subdivision	Policies	Support	Support the objective to avoid reverse sensitivity issues that would prevent or adversely affect activities already established on land from continuing to operate. However, this objective is not supported by clear policies or rules to give effect to this statement in rural areas	amend policies to give effect to the objective
<b>Our Kerikeri Community Charitable Trust (S272)</b>	S272.019	Subdivision	Policies	Support in part	PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more	Insert new policy (inferred) requiring esplanade reserves/strips when subdivision creates lots of 4ha or more when one of the following situations applies: <ul style="list-style-type: none"> <li>•the owner agrees to provide the land on a voluntary basis, or</li> <li>•a third party agrees to provide funds to compensate the land owner for the land (at normal market value), or</li> <li>•the land is included in a development agreement or development contributions or financial contributions (under the RMA or LGA) or other arrangement.</li> </ul>
<b>Northland Regional Council (S359)</b>	S359.012	Subdivision	Policies	Support in part	Recommend low impact stormwater design be mandatory for new development to ensure recharge is maintained (e.g. a requirement in engineering standards to use swales instead of kerb and channel)	Insert new policy: <b>Where subdivision and development is proposed for coastal locations, that on-site storage or suitable alternative is required, including low impact stormwater designs.</b>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Northland Regional Council (S359)</b>	S359.030	Subdivision	Policies	Support in part	We recommend objectives and policies in the subdivision section be strengthened to strongly discourage fragmentation of rural land as this can limit the viability of surrounding farming units and lead to high costs to service these developments. This is of particular concern for highly productive soils and should be based on the provisions in the NPS-HPL. The Regional Policy Statement for Northland does not fully reflect the direction in the NPS-HPL with regard to the protection of productive land. Therefore, it is considered appropriate to take direction from the NPS-HPL	Amend the policies to strongly discourage fragmentation of rural land.
<b>Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)</b>	S425.040	Subdivision	Policies	Support in part	In general, PHTTCCT support well-connected development, and future transport networks (see sub#4) being provided at the time of subdivision. Given the lack of spatial planning incorporated into the plan, it is considered that requiring developers to show how any future transport networks will be accommodated by the development is critical to future proof the District and ensure an integrated well connected transport network. Depending on the scale of development this could include requiring setbacks from indicative roads/cycleways as shown/described in any future or existing) strategies/spatial plans/annual plan be provided, or road connections provided at boundaries of the developments.	Amend the subdivision chapter to ensure that provision for, and connectivity with future transport networks is demonstrated at subdivision
<b>Kapiro Residents Association (S427)</b>	S427.052	Subdivision	Policies	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	Amend the policies to: <ul style="list-style-type: none"> <li>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, and</li> <li>allow development proposals to be rejected</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					other changes that can affect people, amenity values and the character of the area.	on the grounds of significant adverse effects from traffic [inferred].
<b>Kapiro Residents Association (S428)</b>	S428.013	Subdivision	Policies	Support in part	<p>It should be encouraged in the form of well-designed two or three storey buildings, for example, with requirements for permeable open areas including garden/landscaped ground. Developments should use permeable materials wherever feasible for surfaces such as driveways, paths.</p> <p>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.</p> <p>Passive heating and cooling designs, for example, reduce energy consumption and the on-going costs of heating/cooling. Solar panels with batteries, for example, can be purchased on lease-to-buy schemes so that the owner/occupier only pays the amount that they would have paid anyway for grid electricity.</p>	<p>Amend PDP to include objectives, policies and rules/standards that require best practice environmentally sustainable techniques for new developments, including -</p> <ul style="list-style-type: none"> <li>• Permeable materials wherever feasible for surfaces such as driveways, paths etc.</li> <li>• Best practice for lowest environmental impact and water sensitive designs, requiring greywater recycling techniques and other technologies to ensure efficient use of water, rain storage tanks for properties connected to a public water supply, additional water storage for buildings that rely solely on roof water (to cope with drought), and other measures</li> <li>• Renewable energy technologies and energy-efficient technologies, and similar requirements that foster improved environmental design/technologies and lower lifecycle climate impacts</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Additional electricity generation by households will be essential for powering EVs in future because current national generation capacity is not sufficient.	<ul style="list-style-type: none"> <li>Specified area (percentage) of tree canopy cover and green corridors should be required within new subdivisions. These will be increasingly important for shade/cooling for buildings and pedestrians in future.</li> </ul>
<b>John Andrew Riddell (S431)</b>	S431.064	Subdivision	Policies	Not Stated	The guidance and rules relating to environment benefit subdivision and management plan subdivision are inadequate to ensure that the purpose of the Act will be achieved.	Insert the following as a new policy: <b>That more intensive, innovative development and subdivision which recognises specific site characteristics is provided for through the management plan rule where this will result in superior environmental outcomes</b>
<b>John Andrew Riddell (S431)</b>	S431.065	Subdivision	Policies	Not Stated	Well designed subdivision is an important component of achieving sustainable use and development of natural and physical resources, and in establishing and continuing character and sense of place. Subdivision provisions need to be likely to achieve the purposes of the respective zones and recognise and provide for matters of national importance and given effect to national and regional policy statements. This is facilitated by, among other things, clear policy guidance.	Insert the following as a new policy: <b>Subdivision, use and development shall preserve and where possible enhance, restore andrehabilitate the character of the applicable zone in regards to s6 matters. In addition subdivision,use and development shall avoid adverse effects as far as practicable by using techniquesincluding: (a) clustering or grouping</b>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>development within areas where there is the least impact on natural character and its elements such as indigenous vegetation, landforms, rivers, streams and wetlands, and coherent natural patterns; (b) minimising the visual impact of buildings, development, and associated vegetation clearance and earthworks, particularly as seen from public land and the coastal marine area; (c) providing for, through siting of buildings and development and design of subdivisions, legal public right of access to and use of the foreshore and any esplanade areas; (d) through siting of buildings and development, design of subdivisions, and provision of access that recognise and provide for the relationship of Maori with their culture, traditions and taonga including concepts of mauri, tapu, mana, wehi and karakia and the important contribution Maori culture makes to the</p>

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						<p>character of the District (refer Chapter 2 and in particular Section 2.5 and Council's "Tangata Whenua Values and Perspectives" (2004); (e) providing planting of indigenous vegetation in a way that links existing habitats of indigenous fauna and provides the opportunity for the extension, enhancement or creation of habitats for indigenous fauna, including mechanisms to exclude pests; (f) protecting historic heritage through the siting of buildings and development and design of subdivisions. (g) achieving hydraulic neutrality and ensuring that natural hazards will not be exacerbated or induced through the siting and design of buildings and development</p>
<p><b>John Andrew Riddell (S431)</b></p>	<p>S431.066</p>	<p>Subdivision</p>	<p>Policies</p>	<p>Not Stated</p>	<p>There is an inappropriate emphasis on ensuring that vehicle requirements and needs are provided for in the subdivision rules. In urban areas and settlements and in their surrounds good resource management practice is for increased provision for cycling and other active transport and for walking access. Indeed this is a</p>	<p>Insert the following as a new policy: <b>That conditions be imposed upon the design of subdivision of land to require that the layout and orientation of all new lots</b></p>



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					<p>necessary measure to help mitigate and adapt to the effects of climate change.</p>	<p><b>and building platforms created include, as appropriate, provisions for achieving the following: (a) development of energy efficient buildings and structures; (b) reduced travel distances and private car usage; (c) encouragement of pedestrian and cycle use; (d) access to alternative transport facilities; (e) domestic or community renewable electricity generation and renewable energy use.</b></p>
<p><b>John Andrew Riddell (S431)</b></p>	<p>S431.068</p>	<p>Subdivision</p>	<p>Policies</p>	<p>Not Stated</p>	<p>Well designed subdivision is an important component of achieving sustainable use and development of natural and physical resources, and in establishing and continuing character and sense of place. There is an inappropriate emphasis on ensuring that vehicle requirements and needs are provided for in the subdivision rules. In urban areas and settlements and in their surrounds good resource management practice is for increased provision for cycling and other active transport and for walking access. Indeed, this is a necessary measure to help mitigate and adapt to the effects of climate change.</p>	<p>Revise the objectives, policies and provisions to better provide for cycling and active transport and walking in urban areas, settlements and their surrounds</p>
<p><b>John Andrew Riddell (S431)</b></p>	<p>S431.149</p>	<p>Subdivision</p>	<p>Policies</p>	<p>Not Stated</p>	<p>The amendment is necessary in order to achieve the purpose of the Act.</p>	<p>Insert a further criterion in all relevant policies on managing land use and subdivision, as follows: <b>any cumulative effects</b></p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Kapiro Conservation Trust (S442)</b>	S442.149	Subdivision	Policies	Support in part	The policies do not adequately address the protection of indigenous vegetation and habitats of indigenous fauna; and the management of sewage and other sources of contaminants that could affect natural waters.	Insert policies that: 1. Clarify that significant indigenous vegetation and significant habitats of indigenous fauna, (including the balance lot) are to be protected as part of a subdivision. 2. Require cat and/or dog-free subdivision in areas of particular importance to vulnerable indigenous wildlife (e.g. kiwi, matuku, shorebirds) 3. Require sewage and stormwater management to prevent nutrients and sediment from reaching natural waterways, including natural wetlands. 4. Identify priorities where riparian fencing and planting should be a condition of subdivision
<b>Kapiro Conservation Trust (S445)</b>	S445.013	Subdivision	Policies	Support in part	As noted, there is increasing need to support connectivity and active modes of transport. RMA (s77, s230, s237F etc.) specifically allow councils to include a DP rule that requires esplanade when lots of 4 ha or more are created by subdivision: 'A territorial authority may include a rule in its district plan which provides that in respect of any allotment of 4 hectares or more created when land is subdivided, esplanade reserves or esplanade strips, of the width specified in the rule, shall be set aside or created, as the case may be, under section 230(5).' <p>(RMA s77(2)) Voluntary contribution: RMA s237F requires the council to compensate the landowner for esplanade associated with larger lots - unless the landowner agrees not to take compensation, as voluntary action. In addition, s200(1) of the Local Government Act</p>	Amend policies to require esplanade reserves/strips when subdivision creates lots of 4ha or more (as allowed under RMA s77, s230, etc.) when one of the following situations applies: - the owner agrees to provide the land on a voluntary basis, or - a third party agrees to provide funds to compensate the land owner for the land (at normal market value), or - the land is included in a development agreement or development contributions or financial contributions (under the RMA or LGA) or other arrangement

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>2002 allows developers to provide a reserve voluntarily, and s200(2) allows councils to accept voluntary contributions for reserves that are not included in a development contribution: 'This subpart does not prevent a territorial authority from accepting from a person, with that person's agreement, additional contributions for reserves...'</p> <p>Third party funding: In addition, s200(1)(c) of LGA 2002 allows for a third party to fund a reserve (provided that the reserve is not included in a development contribution): 'a third party has funded or provided, or undertaken to fund or provide, the same reserve...'</p> <p>This potentially opens the door for a benefactor or community group to raise funds for specific parcels of esplanade land.</p> <p>Our group considers that DP Policies/Rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more (as allowed under RMA s77, s230, etc.) when one of the following situations applies:</p> <p>(a) the owner agrees to provide the land on a voluntary basis, or (b) a third party provides funds to compensate the land owner for the land (at normal market value), or</p> <p>(c) the land is included in a development agreement or development contributions or financial contributions (under the RMA or LGA).</p>	
<b>Pacific Eco-Logic (S451)</b>	S451.005	Subdivision	Policies	Support in part	<p>The policies do not adequately address the protection of indigenous vegetation and habitats of indigenous fauna; and the management of sewage and other sources of contaminants that could affect natural waters</p>	<p>Insert policies that:</p> <ol style="list-style-type: none"> <li>1. Clarify that significant indigenous vegetation and significant habitats of indigenous fauna, (including the balance lot) are to be protected as part of a subdivision</li> <li>2. Require cat and/or dog-free subdivision in areas of particular importance for vulnerable indigenous wildlife (e.g., kiwi, matuku, shorebirds)</li> </ol>

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						<p>3. Require sewage and stormwater management to prevent nutrients and sediment from reaching natural waterways, including natural wetlands</p> <p>4. Identify priorities where riparian fencing and planting should be a condition of subdivision</p>
<b>Top Energy Limited (S483)</b>	S483.165	Subdivision	Policies	Not Stated	A new policy is required to direct the protection of electricity infrastructure from reverse sensitivity effects generated by in appropriate subdivision and future land use to achieve alignment with the RPS and to SUB - R10 and SUB-R9.	Insert a new policy as follows (or to the same effect). <b>SUB-PXEnsure that subdivision and future land uses do not generate reverse sensitivity effects on electricity network by:ensuring suitable setbacks are achieved from all electricity infrastructure including by requiring setbacks at the time of subdivision from mapped Critical Electricity Lines.</b>
<b>Fire and Emergency New Zealand (S512)</b>	S512.029	Subdivision	Policies	Support	Fire and Emergency support the subdivision policy framework to the extent that subdivision should have the infrastructure appropriate for the intended use of the land (SUB-O3).	retain policies
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S521)</b>	S521.016	Subdivision	Policies	Support in part	<p>It should be encouraged in the form of well-designed two or three storey buildings, for example, with requirements for permeable open areas including garden/landscaped ground. Developments should use permeable materials wherever feasible for surfaces such as driveways, paths.</p> <p>The PDP should require all new buildings to store/use roof water wherever possible, to avoid</p>	<p>Amend PDP to include objectives, policies and rules/standards that require best practice environmentally sustainable techniques for new developments, including -</p> <ul style="list-style-type: none"> <li>• Permeable materials wherever feasible for</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>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.</p> <p>Passive heating and cooling designs, for example, reduce energy consumption and the on-going costs of heating/cooling. Solar panels with batteries, for example, can be purchased on lease-to-buy schemes so that the owner/occupier only pays the amount that they would have paid anyway for grid electricity. Additional electricity generation by households will be essential for powering EVs in future because current national generation capacity is not sufficient.</p>	<p>surfaces such as driveways, paths etc.</p> <ul style="list-style-type: none"> <li>• Best practice for lowest environmental impact and water sensitive designs, requiring greywater recycling techniques and other technologies to ensure efficient use of water, rain storage tanks for properties connected to a public water supply, additional water storage for buildings that rely solely on roof water (to cope with drought), and other measures</li> <li>• Renewable energy technologies and energy-efficient technologies, and similar requirements that foster improved environmental design/technologies and lower lifecycle climate impacts</li> <li>• Specified area (percentage) of tree canopy cover and green corridors should be required within new subdivisions. These will be increasingly important for shade/cooling for buildings and pedestrians in future.</li> </ul>
<p><b>Vision Kerikeri (Vision for Kerikeri and</b></p>	<p>S523.015</p>	<p>Subdivision</p>	<p>Policies</p>	<p>Support in part</p>	<p>As noted, there is increasing need to support connectivity and active modes of transport. RMA (s77, s230, s237F etc.) specifically allow councils to include a DP rule that requires</p>	<p>Amend policies to require esplanade reserves/strips when subdivision creates lots of 4ha or more (as allowed under RMA s77,</p>

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<p><b>Environs, VKK) (S523)</b></p>					<p>esplanade when lots of 4 ha or more are created by subdivision:  'A territorial authority may include a rule in its district plan which provides that in respect of any allotment of 4 hectares or more created when land is subdivided, esplanade reserves or esplanade strips, of the width specified in the rule, shall be set aside or created, as the case may be, under section 230(5).' (RMA s77(2))  Voluntary contribution: RMA s237F requires the council to compensate the landowner for esplanade associated with larger lots - unless the landowner agrees not to take compensation, as voluntary action.  In addition, s200(1) of the Local Government Act 2002 allows developers to provide a reserve voluntarily, and s200(2) allows councils to accept voluntary contributions for reserves that are not included in a development contribution:  'This subpart does not prevent a territorial authority from accepting from a person, with that person's agreement, additional contributions for reserves...'  Third party funding: In addition, s200(1)(c) of LGA 2002 allows for a third party to fund a reserve (provided that the reserve is not included in a development contribution):  'a third party has funded or provided, or undertaken to fund or provide, the same reserve...'  This potentially opens the door for a benefactor or community group to raise funds for specific parcels of esplanade land.  Our group considers that DP Policies/Rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more (as allowed under RMA s77, s230, etc.) when one of the following situations applies:  (a) the owner agrees to provide the land on a voluntary basis, or (b)a third party provides funds to compensate the land owner for the land (at normal market value), or</p>	<p>s230, etc.) when one of the following situations applies:  - the owner agrees to provide the land on a voluntary basis, or  - a third party agrees to provide funds to compensate the land owner for the land (at normal market value), or  - the land is included in a development agreement or development contributions or financial contributions (under the RMA or LGA) or other arrangement</p>

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					(c)the land is included in a development agreement or development contributions or financial contributions (under the RMA or LGA).	
<b>Carbon Neutral NZ Trust (S529)</b>	S529.185	Subdivision	Policies	Support	<p>RMA (s77, s230, s237F etc.) specifically allow councils to include a DP rule that requires esplanade when lots of 4 ha or more are created by subdivision:  'A territorial authority may include a rule in its district plan which provides that in respect of any allotment of 4 hectares or more created when land is subdivided, esplanade reserves or esplanade strips, of the width specified in the rule, shall be set aside or created, as the case may be, under section 230(5).' (RMA s77(2))  Voluntary contribution: RMA s237F requires the council to compensate the landowner for esplanade associated with larger lots - unless the landowner agrees not to take compensation, as voluntary action.  In addition, s200(1) of the Local Government Act 2002 allows developers to provide a reserve voluntarily, and s200(2) allows councils to accept voluntary contributions for reserves that are not included in a development contribution:  'This subpart does not prevent a territorial authority from accepting from a person, with that person's agreement, additional contributions for reserves...'  Third party funding: In addition, s200(1)(c) of LGA 2002 allows for a third party to fund a reserve (provided that the reserve is not included in a development contribution):  'a third party has funded or provided, or undertaken to fund or provide, the same reserve...'  This potentially opens the door for a benefactor or community group to raise funds for specific parcels of esplanade land.  Our group considers that DP Policies/Rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more (as allowed under RMA s77, s230, etc.) when one of</p>	<p>Amend rules/policies to require esplanade reserves/strips when subdivision creates lots of 4ha or more (as allowed under RMA s77, s230, etc.) when one of the following situations applies:  - the owner agrees to provide the land on a voluntary basis, or  - a third party agrees to provide funds to compensate the land owner for the land (at normal market value), or  - the land is included in a development agreement or development contributions or financial contributions (under the RMA or LGA) or other arrangement.</p>

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					<p>the following situations applies:                      (a) the owner agrees to provide the land on a voluntary basis, or                      (b) a third party provides funds to compensate the land owner for the land (at normal market value), or                      (c) the land is included in a development agreement or development contributions or financial contributions (under the RMA or LGA).</p>	
<p><b>Carbon Neutral NZ Trust (S529)</b></p>	<p>S529.220</p>	<p>Subdivision</p>	<p>Policies</p>	<p>Support in part</p>	<p>It should be encouraged in the form of well-designed two or three storey buildings, for example, with requirements for permeable open areas including garden/landscaped ground. Developments should use permeable materials wherever feasible for surfaces such as driveways, paths.</p> <p>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.</p> <p>Passive heating and cooling designs, for example, reduce energy consumption and the on-going costs of heating/cooling. Solar panels with batteries, for example, can be purchased on lease-to-buy schemes so that the</p>	<p>Amend PDP to include objectives, policies and rules/standards that require best practice environmentally sustainable techniques for new developments, including -</p> <ul style="list-style-type: none"> <li>• Permeable materials wherever feasible for surfaces such as driveways, paths etc.</li> <li>• Best practice for lowest environmental impact and water sensitive designs, requiring greywater recycling techniques and other technologies to ensure efficient use of water, rain storage tanks for properties connected to a public water supply, additional water storage for buildings that rely solely on roof water (to cope with drought), and other measures</li> <li>• Renewable energy technologies and energy-efficient technologies, and similar requirements that foster improved environmental</li> </ul>



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					owner/occupier only pays the amount that they would have paid anyway for grid electricity. Additional electricity generation by households will be essential for powering EVs in future because current national generation capacity is not sufficient.	<p>design/technologies and lower lifecycle climate impacts</p> <ul style="list-style-type: none"> <li>Specified area (percentage) of tree canopy cover and green corridors should be required within new subdivisions. These will be increasingly important for shade/cooling for buildings and pedestrians in future.</li> </ul>
<b>Te Rūnanga o Ngāti Rēhia (S559)</b>	S559.051	Subdivision	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>Bentzen Farm Limited (S167)</b>	S167.049	Subdivision	SUB-P1	Support in part	Many existing lots do not comply with the minimum lot size standards and subdivisions (and more so, should that be increased to 40ha in the rural production zone). Boundary adjustments in such circumstances should also be enabled where they do not increase the number of lots created.	Amend policy SUB-P1 as follows: Enable boundary adjustments that: <ul style="list-style-type: none"> <li>a. do not alter: <ul style="list-style-type: none"> <li>i. the degree of non compliance with District Plan rules and standards;</li> <li>ii. the number and location of any access; and</li> <li>iii. the number of certificates of title; and</li> </ul> </li> <li>b. <del>are in accordance with the minimum lot sizes of the zone</del> and comply with access, infrastructure and esplanade provisions.</li> </ul>
<b>Setar Thirty Six Limited (S168)</b>	S168.050	Subdivision	SUB-P1	Support in part	Policy SUB-P1 enables boundary adjustments where they are in accordance with the minimum lot sizes of the zone. Many existing lots do not comply with the minimum lot size standards and subdivisions (and more so, should that be increased to 40ha in the Rural Production zone).	Amend policy SUB-P1 as follows: Enable boundary adjustments that: <ul style="list-style-type: none"> <li>a. do not alter: <ul style="list-style-type: none"> <li>i. the degree of non compliance with District Plan rules and</li> </ul> </li> </ul>

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					Boundary adjustments in such circumstances should also be enabled where they do not increase the number of lots created. The effect of the non-confirming lot already exists and therefore allowing boundary adjustments will not increase density not give rise to further effects on the environment that already exist (subject to meeting the controlled activity matters).	standards; ii. the number and location of any access; and iii. the number of certificates of title; and b. <del>are in accordance with the minimum lot sizes of the zone</del> and comply with access, infrastructure and esplanade provisions.
<b>Russell Protection Society (INC) (S179)</b>	S179.095	Subdivision	SUB-P1	Support		Retain SUB-P1
<b>The Shooting Box Limited (S187)</b>	S187.042	Subdivision	SUB-P1	Support in part	Policy SUB-P1 enables boundary adjustments where they are in accordance with the minimum lot sizes of the zone. Many existing lots do not comply with the minimum lot size standards and subdivisions (and more so, should that be increased to 40ha in the rural production zone). Boundary adjustments in such circumstances should also be enabled where they do not increase the number of lots created. The effect of the non-confirming lot already exists and therefore allowing boundary adjustments will not increase density not give rise to further effects on the environment that already exist (subject to meeting the controlled activity matters).	Amend policy SUB-P1 as follows: Enable boundary adjustments that: a. do not alter: i. the degree of non compliance with District Plan rules and standards; ii. the number and location of any access; and iii. the number of certificates of title; and b. <del>are in accordance with the minimum lot sizes of the zone</del> and comply with access, infrastructure and esplanade provisions.
<b>Wendover Two Limited (S222)</b>	S222.051	Subdivision	SUB-P1	Support in part	Policy SUB-P1 enables boundary adjustments where they are in accordance with the minimum lot sizes of the zone. Many existing lots do not comply with the minimum lot size standards and subdivisions (and more so, should that be increased to 40ha in the rural production zone). Boundary adjustments in such circumstances	Amend policy SUB-P1 as follows: Enable boundary adjustments that: a. do not alter: i. the degree of non compliance with District Plan rules and standards;

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					should also be enabled where they do not increase the number of lots created. The effect of the non-confirming lot already exists and therefore allowing boundary adjustments will not increase density not give rise to further effects on the environment that already exist (subject to meeting the controlled activity matters).	ii. the number and location of any access; and iii. the number of certificates of title; and b. <del>are in accordance with the minimum lot sizes of the zone</del> and comply with access, infrastructure and esplanade provisions.
<b>Matauri Trustee Limited (S243)</b>	S243.067	Subdivision	SUB-P1	Support in part	Policy SUB-P1 enables boundary adjustments where they are in accordance with the minimum lot sizes of the zone. Many existing lots do not comply with the minimum lot size standards and subdivisions (and more so, should that be increased to 40ha in the rural production zone). Boundary adjustments in such circumstances should also be enabled where they do not increase the number of lots created. The effect of the non-confirming lot already exists and therefore allowing boundary adjustments will not increase density not give rise to further effects on the environment that already exist (subject to meeting the controlled activity matters).	Amend policy SUB-P1 as follows: Enable boundary adjustments that:  a. do not alter: i. the degree of non compliance with District Plan rules and standards; ii. the number and location of any access; and iii. the number of certificates of title; and b. <del>are in accordance with the minimum lot sizes of the zone</del> and comply with access, infrastructure and esplanade provisions.
<b>Our Kerikeri Community Charitable Trust (S272)</b>	S272.020	Subdivision	SUB-P1	Support in part	In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System. s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present.	Amend provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values

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					PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values	
<b>P S Yates Family Trust (S333)</b>	S333.042	Subdivision	SUB-P1	Support in part	Policy SUB-P1 enables boundary adjustments where they are in accordance with the minimum lot sizes of the zone. Many existing lots do not comply with the minimum lot size standards and subdivisions (and more so, should that be increased to 40ha in the rural production zone). Boundary adjustments in such circumstances should also be enabled where they do not increase the number of lots created. The effect of the non-confirming lot already exists and therefore allowing boundary adjustments will not increase density not give rise to further effects on the environment that already exist (subject to meeting the controlled activity matters).	Amend policy SUB-P1 as follows: Enable boundary adjustments that: a. do not alter: i. the degree of non compliance with District Plan rules and standards; ii. the number and location of any access; and iii. the number of certificates of title; and <del>b. are in accordance with the minimum lot sizes of the zone and</del> comply with access, infrastructure and esplanade provisions.
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.077	Subdivision	SUB-P1	Support	not stated	Retain SUB-P1 as notified
<b>Far North District Council (S368)</b>	S368.088	Subdivision	SUB-P1	Support in part	Drafting error. There is a potential conflict in the policy for boundary adjustments where one or more lots being adjusted is not able to comply with the minimum lot sizes in a zone, and will still not achieve them after the proposed boundary adjustment. A the boundary adjustment cannot achieve (b) due to not complying with the zone minimum lot size. b. It therefore needs to be deleted.	Amend SUB-P1 a. do not alter: i. the degree of non compliance with District Plan rules and standards; ii. the number and location of any access; and iii. the number of certificates of title; and <del>b. are in accordance with the minimum</del>

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						lot sizes of the zone and comply with access, infrastructure and esplanade provisions.
<b>Kapiro Conservation Trust (S445)</b>	S445.023	Subdivision	SUB-P1	Support in part	<p>In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System.</p> <p>s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present.</p> <p>PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values</p>	Amend SUB-P1 (inferred) relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)</b>	S523.022	Subdivision	SUB-P1	Support in part	<p>In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System.</p> <p>s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present.</p> <p>PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values</p>	Amend SUB-P1 (inferred) relating to esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values

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<b>Carbon Neutral NZ Trust (S529)</b>	S529.189	Subdivision	SUB-P1	Support in part	<p>In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System.</p> <p>s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present.</p> <p>PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values</p>	Amend provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values
<b>Carbon Neutral NZ Trust (S529)</b>	S529.190	Subdivision	SUB-P1	Support in part	<p>In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System.</p> <p>s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present.</p> <p>PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values</p>	Amend provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values
<b>Russell Protection Society (INC) (S179)</b>	S179.096	Subdivision	SUB-P2	Support		Retain SUB-P2
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.078	Subdivision	SUB-P2	Support	not stated	Retain SUB-P2 as notified

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Waiaua Bay Farm Limited (S463)	S463.042	Subdivision	SUB-P2	Support	WBF supports the enablement of subdivision for these purposes.	Retain Policy SUB-P2
Horticulture New Zealand (S159)	S159.067	Subdivision	SUB-P3	Support in part	The adequate building platform needs to be within the setbacks for the zone	Amend subsection c of Policy SUB-P3 as follows: have an adequate size and appropriate shape to contain a building platform, <b>within setbacks for the zone;</b>
Bentzen Farm Limited (S167)	S167.050	Subdivision	SUB-P3	Support	The provision of subdivision in the circumstances listed is supported as an efficient use of the land resource of the district.	Retain Policy SUB-P3
Setar Thirty Six Limited (S168)	S168.051	Subdivision	SUB-P3	Support	The provision of subdivision in the circumstances listed is supported as an efficient use of the land resource of the district	Retain Policy SUB-P3
Terra Group (S172)	S172.025	Subdivision	SUB-P3	Support	Support policy as it will achieve positive outcomes for the proposed zone.	Retain as notified (inferred)
Russell Protection Society (INC) (S179)	S179.097	Subdivision	SUB-P3	Support		Retain SUB-P3
The Shooting Box Limited (S187)	S187.043	Subdivision	SUB-P3	Support	The provision of subdivision in the circumstances listed is supported as an efficient use of the land resource of the district.	Retain Policy SUB-P3.
Matauri Trustee Limited (S243)	S243.068	Subdivision	SUB-P3	Support	The provision of subdivision in the circumstances listed is supported as an efficient use of the land resource of the district.	Retain Policy SUB-P3
P S Yates Family Trust (S333)	S333.043	Subdivision	SUB-P3	Support	The provision of subdivision in the circumstances listed is supported as an efficient use of the land resource of the district.	Retain Policy SUB-P3
Neil Construction Limited (S349)	S349.011	Subdivision	SUB-P3	Oppose	A better outcome in these circumstances is to utilise the land more efficiently for rural residential use, adding much needed housing to Kerikeri in a way that does not impose any burden on the community in terms of providing or funding infrastructure.	delete SUB-P3, or amend to reduce the emphasis on compliance with minimum lot sizes in SUB-P3
Waka Kotahi NZ Transport	S356.084	Subdivision	SUB-P3	Support in part	Support for SUB-P3 subject to amendments to clause	Amend as follows: Provide for subdivision where it

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Agency (S356)					(a) to refer to the objectives and policies of the zone rather than 'purpose' 'characteristics' and 'qualities' of the zone, none of which have been defined in the plan or included in the zone provisions. Referencing the zone objectives and policies will provide better clarity and certainty to the decision making process.	results in allotments that: a. are consistent with the <del>purpose, characteristics and qualities</del> <b>objectives and policies of the zone;</b> ...
Waiaua Bay Farm Limited (S463)	S463.043	Subdivision	SUB-P3	Oppose	The reference to "characteristics and qualities" in sub-clause (a) requires deletion and replacement with reference to the zone objectives. It may be that the intent of the drafting is to refer to characteristics and qualities of the land (such as topography or vegetation coverage) rather than the zone. In that case, redrafting is also needed for clarity.	Amend point a. of Policy SUB-P3 as follows: a. are consistent with <b>achieving the purpose, and objectives</b> <del>characteristics and qualities</del> of the zone;
Russell Protection Society (INC) (S179)	S179.098	Subdivision	SUB-P4	Support		Retain SUB-P4
Waka Kotahi NZ Transport Agency (S356)	S356.085	Subdivision	SUB-P4	Neutral	Suggest amending SUB-P4 to provide greater clarity.	Amend SUB-P4 to provide greater clarity.
Waiaua Bay Farm Limited (S463)	S463.044	Subdivision	SUB-P4	Oppose	This content is set out in Note 1 (before the rule table) and therefore this policy is redundant.	Delete Policy SUB-P4
Carbon Neutral NZ Trust (S529)	S529.144	Subdivision	SUB-P4	Support	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 SUB-P4 to at least, maintain indigenous biodiversity or ecosystems
Russell Protection Society (INC) (S179)	S179.099	Subdivision	SUB-P5	Support		Retain SUB-P5



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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>	S331.055	Subdivision	SUB-P5	Support in part	The submitter supports in part policy SUB-P5 as it manages subdivision design and layout and ensure walking and cycling accessibility is provided. However, the Ministry requests that specific provision for additional infrastructure is provided to ensure that population growth and the impact of educational facilities is considered within developments, so as to provide for the health and wellbeing of communities including access to education.	Amend policy SUB-P5 as follows: Manage subdivision design and layout in the General Residential, Mixed Use and Settlement zone to provide for safe, connected and accessible environments by: <ul style="list-style-type: none"> <li>a. minimising vehicle crossings that could affect the safety and efficiency of the current and future transport network;</li> <li>b. avoid cul-de-sac development unless the site or the topography prevents future public access and connections;</li> <li>c. providing for development that encourages social interaction, neighbourhood cohesion, a sense of place and is well connected to public spaces;</li> <li>d. contributing to a well connected transport network that safeguards future roading connections; and</li> <li>e. maximising accessibility, connectivity by creating walkways, cycleways and an interconnected transport network; <b>andf.</b></li> </ul> <p style="text-align: center;"><b>ensuring growth and development is supported by additional infrastructure where required.</b></p>
<b>Our Kerikeri Community Charitable Trust (S338)</b>	S338.049	Subdivision	SUB-P5	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	Retain Policy SUB-P5 (inferred)

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					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.	
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.079	Subdivision	SUB-P5	Support	not stated	Retain SUB-P5 as notified
<b>Kapiro Conservation Trust (S449)</b>	S449.018	Subdivision	SUB-P5	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 Policy SUB-P5 (inferred)
<b>Fire and Emergency New Zealand (S512)</b>	S512.030	Subdivision	SUB-P5	Support in part	Fire and Emergency supports the intent to create a safe transport environment. This includes adequate emergency access on both the public roading network and private accessways.	Amend SUB-P5 e. maximising accessibility and wayfinding <b>(including for emergency response), and connectivity</b> by creating walkways, cycleways and an interconnected transport network. Note: For further guidance on providing for emergency response access please see Fire and Emergency New Zealand F5-02 GD Designers' Guide to Firefighting Operations: Emergency Vehicle Access, specifically

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						Section 4.2
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S522)</b>	S522.010	Subdivision	SUB-P5	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 Policy SUB-P5 (inferred)
<b>Carbon Neutral NZ Trust (S529)</b>	S529.017	Subdivision	SUB-P5	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 Policy SUB-P5 (inferred)
<b>Kairos Connection Trust and Habitat for Humanity Northern Region Ltd (S138)</b>	S138.008	Subdivision	SUB-P6	Support in part	Support the ability to increase the subdividable urban residential intensity potential in the General Residential zone via the proposed multi-unit development activity category (Rule SUB-R5). However, seek that the Council provide more information and greater confidence to developers about the capacity of existing urban wastewater systems to service "Plan enabled" permitted and controlled residential activity, in particular the viability of proposed multi-unit residential development densities that are smaller than the general minimum allotment sizes. This is of particular importance for a subdivision proposal considering a land use consent for a multi-unit development forming the basis of a 'controlled activity' subdivision	Amend Policy SUB-P6 to clarify the availability of infrastructure capacity in the District's urban reticulated environments so that this policy can be achieved at the time of subdivision or land development stage.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					application could be approved without reference to infrastructure capacity requirements.	
<b>Russell Protection Society (INC) (S179)</b>	S179.100	Subdivision	SUB-P6	Support		Retain SUB-P6
<b>Our Kerikeri Community Charitable Trust (S338)</b>	S338.012	Subdivision	SUB-P6	Not Stated	Having relevant infrastructure in place should be a prerequisite for future development. The provision of necessary infrastructure must be high priority in PDP policies/rules. Given the Council's funding constraints, we consider that developers should normally be required to provide the necessary infrastructure, including items such as on-site community wastewater systems	Amend Policy SUB-P6 to emphasise the requirement for developer input for infrastructure servicing private land use and subdivision
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.086	Subdivision	SUB-P6	Support in part	Support SUB-P6. Suggest amending to ensure that infrastructure should be provided in a timely and integrated manner. In clause (b) reference the objectives and policies of the zone rather than the purpose, characteristics and qualities of the zone.	Amend as follows: Require infrastructure to be provided in a <b>timely, integrated and comprehensive</b> manner by: a. demonstrating that the subdivision will be appropriately serviced and integrated with existing and planned infrastructure if available; and b. ensuring that the infrastructure is provided is in accordance with <b>objectives and policies</b> <del>the purpose, characteristics and qualities of</del> the zone.
<b>Kapiro Conservation Trust (S449)</b>	S449.013	Subdivision	SUB-P6	Support in part	Having relevant infrastructure in place should be a prerequisite for future development. The provision of necessary infrastructure must be	Amend Policy SUB-P6 to emphasise the requirement for developer input for infrastructure

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					high priority in PDP policies/rules. Given the Council's funding constraints, we consider that developers should normally be required to provide the necessary infrastructure, including items such as on-site community wastewater systems	servicing private land use and subdivision
<b>Spark New Zealand Trading Limited and Vodafone New Zealand Limited (S517)</b>	S517.001	Subdivision	SUB-P6	Support	Requirement in Policies SUB-P6 and SUB-P11 for subdivisions to have electricity and telecommunication connections is supported	Retain Policy SUB-P6
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S522)</b>	S522.035	Subdivision	SUB-P6	Support in part	Having relevant infrastructure in place should be a prerequisite for future development. The provision of necessary infrastructure must be high priority in PDP policies/rules. Given the Council's funding constraints, we consider that developers should normally be required to provide the necessary infrastructure, including items such as on-site community wastewater systems	Amend Policy SUB-P6 to emphasise the requirement for developer input for infrastructure servicing private land use and subdivision
<b>Carbon Neutral NZ Trust (S529)</b>	S529.012	Subdivision	SUB-P6	Support in part	Having relevant infrastructure in place should be a prerequisite for future development. The provision of necessary infrastructure must be high priority in PDP policies/rules. Given the Council's funding constraints, we consider that developers should normally be required to provide the necessary infrastructure, including items such as on-site community wastewater systems	Amend Policy SUB-P6 to emphasise the requirement for developer input for infrastructure servicing private land use and subdivision
<b>Lynley Newport (S118)</b>	S118.001	Subdivision	SUB-P7	Oppose	The submitter considers that SUB-P7 needs to provide for the creation of esplanade strips, not just the vesting of esplanade reserves.	Amend SUB-P7 to read: Require the vesting of esplanade reserves, or establishment of esplanade strips, when subdividing land adjoining the coast or other qualified waterbodies.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Bentzen Farm Limited (S167)</b>	S167.051	Subdivision	SUB-P7	Support	Although a more accurate expression of policy intent than policy PA-P2, it should limit its application to specified lots sizes to align with its associated rules.	Amend Policy SUB-P7 as follows Require the vesting of esplanade reserves when subdividing <b>to specified lots sizes</b> land adjoining the coast or other qualifying waterbodies.
<b>Setar Thirty Six Limited (S168)</b>	S168.052	Subdivision	SUB-P7	Oppose	The policy that requires the vesting of esplanade reserves when subdividing land adjoining the coast or other qualifying waterbodies. Although a more accurate expression of policy intent than policy PA-P2, it should limit its application to specified lots sizes to align with its associated rules.	Amend Policy SUB-P7 as follows; Require the vesting of esplanade reserves when subdividing <b>to specified lots sizes</b> land adjoining the coast or other qualifying waterbodies
<b>Russell Protection Society (INC) (S179)</b>	S179.101	Subdivision	SUB-P7	Support		Retain SUB-P7
<b>The Shooting Box Limited (S187)</b>	S187.044	Subdivision	SUB-P7	Support	The policy that requires the vesting of esplanade reserves when subdividing land adjoining the coast or other qualifying waterbodies. Although a more accurate expression of policy intent than policy PA-P2, it should limit its application to specified lots sizes to align with its associated rules.	Amend Policy SUB-P7 as follows.
<b>Thomson Survey Ltd (S202)</b>	S202.001	Subdivision	SUB-P7	Support in part	SUB-P7 needs to provide for the creation of esplanade strips, not just the vesting of esplanade reserves.	Amend SUB-P7 to read: "Require the vesting of esplanadereserves, <b>or establishment of esplanade strips</b> , when subdividing land adjoiningthe coast or other qualifying waterbodies."
<b>Matauri Trustee Limited (S243)</b>	S243.069	Subdivision	SUB-P7	Support	The policy that requires the vesting of esplanade reserves when subdividing land adjoining the coast or other qualifying waterbodies. Although a more accurate expression of policy intent than	Amend Policy SUB-P7 as follows Require the vesting of esplanade reserves when subdividing <b>to specified lots sizes</b> land

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					policy PA-P2, it should limit its application to specified lots sizes to align with its associated rules.	adjoining the coast or other qualifying waterbodies.
<b>Our Kerikeri Community Charitable Trust (S272)</b>	S272.003	Subdivision	SUB-P7	Support	<p>Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. In particular we support - Subdivision SUB-O4, SUB-P7 and SUB-S8.</p> <p>PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more.</p> <p>PDP provisions that normally require esplanade reserves when consenting land use and other forms of development.</p> <p>Improve provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values.</p>	Retain SUB-P7 (inferred)
<b>Our Kerikeri Community Charitable Trust (S272)</b>	S272.021	Subdivision	SUB-P7	Support	<p>In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System.</p> <p>s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present.</p> <p>PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values</p>	Amend provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values
<b>P S Yates Family Trust (S333)</b>	S333.044	Subdivision	SUB-P7	Support in part	The policy that requires the vesting of esplanade reserves when subdividing land adjoining the coast or other qualifying waterbodies. Although a more	Amend Policy SUB-P7 as follows: Require the vesting of esplanade reserves when subdividing <b>to specified lots sizes land</b>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					accurate expression of policy intent than policy PA-P2,it should limit its application to specified lots sizes to align with its associated rules	adjoining the coast or other qualifying waterbodies.
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.080	Subdivision	SUB-P7	Support	not stated	Retain SUB-P7 as notified
<b>Kapiro Conservation Trust (S445)</b>	S445.007	Subdivision	SUB-P7	Support	<p>Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.</p> <p>In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section):</p> <ul style="list-style-type: none"> <li>- 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3)</li> <li>- 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3)</li> </ul>	Retain SUB-P7
<b>Kapiro Conservation Trust (S445)</b>	S445.024	Subdivision	SUB-P7	Support in part	<p>In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System.</p> <p>s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity.</p>	Amend SUB-P7 (inferred) relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present.</p> <p>PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values</p>	with significant ecological values
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)</b>	S523.003	Subdivision	SUB-P7	Support	<p>Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.</p> <p>In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section):</p> <ul style="list-style-type: none"> <li>- 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3)</li> <li>- 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3)</li> </ul>	Retain SUB-P7
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)</b>	S523.023	Subdivision	SUB-P7	Support in part	<p>In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System.</p> <p>s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise</p>	Amend SUB-P7 (inferred) relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present.</p> <p>PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values</p>	Classification System and areas with significant ecological values
<b>Carbon Neutral NZ Trust (S529)</b>	S529.058	Subdivision	SUB-P7	Support	<p>Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. In particular, we support Subdivision SUB-O4, SUB-P7 and SUB-S8.</p> <p>PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more.</p> <p>PDP provisions that normally require esplanade reserves when consenting land use and other forms of development.</p> <p>Improve provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values.</p>	Retain SUB-P7
<b>Martin John Yuretich (S40)</b>	S40.006	Subdivision	SUB-P8	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 the original SNA mapping. In fact, none of</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>Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB,</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.	<p>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>
Joel Vieviorka (S41)	S41.006	Subdivision	SUB-P8	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 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> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<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>• 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>Paul O'Connor (S49)</b></p>	<p>S49.005</p>	<p>Subdivision</p>	<p>SUB-P8</p>	<p>Oppose</p>	<p>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 an ecologist at their expense. It is not fair to assume all bush is under SNA unless proven otherwise.</p>	<p>Amend to Provide a simple bush protection covenant by consent notice, instead of just the Reserves Act and QEII covenants</p>
<p><b>Strand Homes Ltd/Okahu Developments Ltd (S77)</b></p>	<p>S77.005</p>	<p>Subdivision</p>	<p>SUB-P8</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</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>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>
<b>Lynley Newport (S118)</b>	S118.002	Subdivision	SUB-P8	Oppose	The submitter considers that in SUB-P8 the use of the word "avoid" is too negative and restrictive and that the use of more positive terms can achieve the same outcome.	Amend SUB-P8 to read: Provide opportunities for rural lifestyle subdivision in the Rural Production zone where the subdivision: a. will protect a qualifying SNA in perpetuity and result in the SNA being added to the District Plan schedule; and/or b. will not result in the material loss of versatile soils for primary production activities.
<b>Trevor John Ashford (S146)</b>	S146.006	Subdivision	SUB-P8	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	Amend to: <ul style="list-style-type: none"> <li>• Acknowledge that ratepayers have managed to enhance the</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>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>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>
<b>Horticulture New Zealand (S159)</b>	S159.068	Subdivision	SUB-P8	Support in part	There is no specific policy framework for the Horticulture zone so seek that it be specifically included in P8. Also, the reference should be to highly productive land - not versatile soils	Amend Policy SUB-P8 by including Horticulture zone. Amend subsection b of Policy SUB-P8 replacing the term 'versatile soils' with 'highly productive land'.
<b>Shanon Garton (S161)</b>	S161.005	Subdivision	SUB-P8	Oppose	After consultation with landowners, the FNDC withdrew the SNA maps from the PDP. Despite this clear opposition to the concept, the above	Amend to:

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>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 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>Julianne Sally Bainbridge (S163)</b></p>	<p>S163.009</p>	<p>Subdivision</p>	<p>SUB-P8</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</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</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>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>do this, facilitate and 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>Bentzen Farm Limited (S167)</b></p>	<p>S167.052</p>	<p>Subdivision</p>	<p>SUB-P8</p>	<p>Oppose</p>	<p>The policy should recognise that limited rural lifestyle subdivision may be a sustainable use of land resources, particularly where they are degraded and unsuited to productive use and significant environmental gains can be made. In these circumstances, subdivision, through an injection of capital and introduction of a 'community of care', allows for restoration and enhancement opportunities to be implemented and maintained through legal protection and ongoing obligations. The policy as drafted does not support subdivision rules SUB-R6 "Environmental benefit subdivision" nor SUB-R7 "Management plan subdivision" and should be redrafted to actively 'provide for' such opportunities.</p>	<p>Delete Policy SUB-P8 (inferred) and replace with the following:<b>SUB-P8Provide limited opportunities for rural lifestyle subdivision in rural areas while ensuring that:(a) there will be significant environmental protection of indigenous vegetation including restoration, or wetlands;(b) subdivision avoids the inappropriate proliferation and dispersal of development by limiting the</b></p>



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>number of sites created;(c) subdivision avoids inappropriate development within areas of the Outstanding Natural Landscape Overlay, Outstanding Natural Character Overlay, High Natural Character Overlay and the coastal environment;(d) adverse effects on rural and coastal character are avoided, remedied or mitigated;(e) sites are of sufficient size to absorb and manage adverse effects within the site; and(f) reverse sensitivity effects are managed in a way that does not compromise the viability of rural sites for continued production; and(g) loss of versatile soils for primary production activities is avoided.</p>
<p><b>Setar Thirty Six Limited (S168)</b></p>	<p>S168.053</p>	<p>Subdivision</p>	<p>SUB-P8</p>	<p>Oppose</p>	<p>Policy SUB-P8 (inferred) which seeks to avoid rural lifestyle subdivision in rural zones, does not set out all of the circumstances where limited rural lifestyle subdivision in the Rural Production Zone may be appropriate, and can provide economic and environmental benefit. The policy should recognise that limited rural lifestyle subdivision may be a sustainable use of</p>	<p>Delete Policy SUB-P8 (inferred) and replace with the following: SUB-P8<b>Provide limited opportunities for rural lifestyle subdivision in rural areas while ensuring that:(a) there will be significant</b></p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>land resources, particularly where they are degraded and unsuited to productive use and significant environmental gains can be made. In these circumstances, subdivision, through an injection of capital and introduction of a 'community of care', allows for restoration and enhancement opportunities to be implemented and maintained through legal protection and ongoing obligations. The policy as drafted does not support subdivision rules SUB-R6 "Environmental benefit subdivision" nor SUB-R7 "Management plan subdivision" and should be redrafted to actively 'provide for' such opportunities.</p>	<p><b>environmental protection of indigenous vegetation including restoration, or wetlands;(b) subdivision avoids the inappropriate proliferation and dispersal of development by limiting the number of sites created;(c) subdivision avoids inappropriate development within areas of the Outstanding Natural Landscape Overlay, Outstanding Natural Character Overlay, High Natural Character Overlay and the coastal environment;(d) adverse effects on rural and coastal character are avoided, remedied or mitigated;(e) sites are of sufficient size to absorb and manage adverse effects within the site; and(f) reverse sensitivity effects are managed in a way that does not compromise the viability of rural sites for continued production; and(g) loss of versatile soils for primary production activities is avoided.</b></p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Russell Protection Society (INC) (S179)	S179.102	Subdivision	SUB-P8	Support		Retain SUB-P8
The Shooting Box Limited (S187)	S187.045	Subdivision	SUB-P8	Oppose	<p>The policy should recognise that limited rural lifestyle subdivision may be a sustainable use of land resources, particularly where they are degraded and unsuited to productive use and significant environmental gains can be made. In these circumstances, subdivision, through an injection of capital and introduction of a 'community of care', allows for restoration and enhancement opportunities to be implemented and maintained through legal protection and ongoing obligations. The policy as drafted does not support subdivision rules SUB-R6 "Environmental benefit subdivision" nor SUB-R7 "Management plan subdivision" and should be redrafted to actively 'provide for' such opportunities.</p>	<p>Delete Policy SUB-P8 (inferred) and replace with the following:<b>SUB-P8Provide limited opportunities for rural lifestyle subdivision in rural areas while ensuring that:(a) there will be significant environmental protection of indigenous vegetation including restoration, or wetlands;(b) subdivision avoids the inappropriate proliferation and dispersal of development by limiting the number of sites created;(c) subdivision avoids inappropriate development within areas of the Outstanding Natural Landscape Overlay, Outstanding Natural Character Overlay, High Natural Character Overlay and the coastal environment;(d) adverse effects on rural and coastal character are avoided, remedied or mitigated;(e) sites are of sufficient size to absorb and manage adverse</b></p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<b>effects within the site; and(f) reverse sensitivity effects are managed in a way that does not compromise the viability of rural sites for continued production; and(g) loss of versatile soils for primary production activities is avoided.</b>
<b>Thomson Survey Ltd (S202)</b>	S202.002	Subdivision	SUB-P8	Support in part	SUB-P8 uses that word "avoid" again and that makes it entirely too negative and restrictive. Why can't the Council see how easy it is to change a negative into a positive and still achieve the same outcome?	Amend SUB-P8 to read: " <i>Provide opportunities for rural lifestyle subdivision in the Rural Production zone where the subdivision:</i> a. Will protect a qualifying SNA in perpetuity and result in the SNA being added to the District Plan SNAschedule; <b>and/or</b> b. Will not result in the material loss of versatile soils for primary production activities."
<b>Haigh Workman Limited (S215)</b>	S215.030	Subdivision	SUB-P8	Support in part	The definition of 'Land Susceptible to Instability' appropriately includes a combination of geological units, overall ground slope and proximity to steeper land. The definition is useful as a mapping tool to indicate when land may be unstable and geotechnical advice should be sought, but it does not necessarily mean that the ground is unstable. This is quite different from the areas mapped by NRC as subject to flooding or coastal erosion where extensive	Amend SUB-R8 so that Controlled Activity status apply to subdivisions where a geotechnical report by a qualified professional establishes that the land subject to subdivision is not prone to instability or can be engineered to be stable even though it falls within the definition of Land

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>analysis and modelling has been carried out and there is a high degree of certainty that the land is subject to the hazard.</p> <p>Under the definition, large portions of Northland would be deemed 'Land Susceptible to Instability'. Under Rule NH-R10, a resource consent would be required for many new buildings or extensions to existing buildings in addition to the building consents required under the Building Act. Given that the Building Act process would require geotechnical design that addresses any instability issues, we wonder what the purpose is in having another statutory layer addressing the same issue.</p> <p>It seems probable that within the next 10 years, that a study will be carried out to more accurately define land susceptible to instability in the Far North District. As with flood mapping, ideally the definition would provide sufficient flexibility to allow the use of any published geotechnical assessment that more accurately maps land susceptible to instability.</p>	Susceptible to Instability'.
<p><b>Matauri Trustee Limited (S243)</b></p>	S243.070	Subdivision	SUB-P8	Oppose	<p>Policy SUB-P8 (inferred) which seeks to avoid rural lifestyle subdivision in rural zones, does not set out all of the circumstances where limited rural lifestyle subdivision in the Rural Production Zone may be appropriate, and can provide economic and environmental benefit.</p> <p>The policy should recognise that limited rural lifestyle subdivision may be a sustainable use of land resources, particularly where they are degraded and unsuited to productive use and significant environmental gains can be made. In these circumstances, subdivision, through an injection of capital and introduction of a 'community of care', allows for restoration and enhancement opportunities to be implemented and maintained through legal protection and ongoing obligations. The policy as drafted does not support subdivision rules SUB-R6 "Environmental benefit subdivision" nor SUB-R7 "Management</p>	<p>Delete Policy SUB-P8 (inferred) and replace with the following:  <b>SUB-P8 Provide limited opportunities for rural lifestyle subdivision in rural areas while ensuring that:(a) there will be significant environmental protection of indigenous vegetation including restoration, or wetlands;(b) subdivision avoids the inappropriate proliferation and dispersal of development by limiting the number of sites created;(c) subdivision avoids</b></p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					plan subdivision" and should be redrafted to actively 'provide for' such opportunities.	<b>inappropriate development within areas of the Outstanding Natural Landscape Overlay, Outstanding Natural Character Overlay, High Natural Character Overlay and the coastal environment;(d) adverse effects on rural and coastal character are avoided, remedied or mitigated;(e) sites are of sufficient size to absorb and manage adverse effects within the site; and(f) reverse sensitivity effects are managed in a way that does not compromise the viability of rural sites for continued production; and(g) loss of versatile soils for primary production activities is avoided.</b>
<b>Te Hiku Community Board (S257)</b>	S257.008	Subdivision	SUB-P8	Oppose	We do not support the large title sizes in the rural zone. We submit that subdivision should allow lots to 4ha or smaller, and that the subdivision of smaller lots around existing houses be provided for.	Amend policy SUB-P8, by adding more circumstances where rural lifestyle bocks can be allowed in the Rural Production Zone, especially around existing houses
<b>P S Yates Family Trust (S333)</b>	S333.045	Subdivision	SUB-P8	Oppose	Policy SUB-P8 which seeks to avoid rural lifestyle subdivision in rural zones, does not set out all of the circumstances where limited rural lifestyle subdivision in the Rural Production Zone may be appropriate, and can provide economic	<b>Delete</b> Policy SUB-P8 and replace with the following: <i>SUB-P8 Provide limitedopportunities for rural</i>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>and environmental benefit.                      The policy should recognise that limited rural lifestyle subdivision may be a sustainable use of land resources, particularly where they are degraded and unsuited to productive use and significant environmental gains can be made. In these circumstances, subdivision, through an injection of capital and introduction of a 'community of care', allows for restoration and enhancement opportunities to be implemented and maintained through legal protection and ongoing obligations. The policy as drafted does not support subdivision rules SUB-R6 "Environmental benefit subdivision" nor SUB-R7 "Management plan subdivision" and should be redrafted to actively 'provide for' such opportunities.</p>	<p><i>lifestyle subdivision in rural areas while ensuring that: (a) there will be significant environmental protection of indigenous vegetation including restoration, or wetlands; (b) subdivision avoids the inappropriate proliferation and dispersal of development by limiting the number of sites created; (c) subdivision avoids inappropriate development within areas of the Outstanding Natural Landscape Overlay, Outstanding Natural Character Overlay, High Natural Character Overlay and the coastal environment; (d) adverse effects on rural and coastal character are avoided, remedied or mitigated; (e) sites are of sufficient size to absorb and manage adverse effects within the site; and (f) reverse sensitivity effects are managed in a way that does not compromise the viability of rural sites for continued production; and (g) loss of versatile soils for primary production activities is</i></p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<i>avoided.</i>
<b>Sapphire Surveyors Limited (S348)</b>	S348.012	Subdivision	SUB-P8	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 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>
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.081	Subdivision	SUB-P8	Support	not stated	Retain SUB-P8 as notified



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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Sean Frieling (S357)</b>	S357.008	Subdivision	SUB-P8	Oppose	<p>The new subdivision rules will severely restrict the ability to create small rural lots in the rural production zone.</p> <p>The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and the less productive land when it comes to subdivision.</p> <p>It is correct to protect rural productive potential, but this can be achieved without imposing a total restriction on rural lifestyle properties. We do not support the large title sizes in the rural zone. We submit that subdivision should allow lots to 4ha or smaller, and that the subdivision of smaller lots around existing houses be provided for.</p>	Amend policy SUB-P8, by adding more circumstances where rural lifestyle bocks can be allowed in the Rural Production Zone, especially around existing houses.
<b>Sean Frieling (S357)</b>	S357.035	Subdivision	SUB-P8	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 inthe District, facilitate and assist them in what they are already doing.</p> <p>Modify the approach to mapping and identification of SNA inaccordance with the draft NPS for indigenous biodiversity.</p> <p>Insert incentives, not disincentives for landowners to enhancethe natural biodiversity of their land.</p> <p>Amend the options for bush protection.</p> <p>Make SNA mapping available to thepublic.</p>
<b>Leah Frieling (S358)</b>	S358.008	Subdivision	SUB-P8	Oppose	<p>We do not support the large title sizes in the Rural Production zone. We submit that subdivision should allow lots to 4ha or smaller, and that the subdivision of smaller lots around existing houses be provided for.</p> <p>With Council struggling to provide urban amenities and people wanting to live</p>	Amend policy SUB-P8, by adding more circumstances where rural lifestyle bocks can be allowed in the Rural Production Zone, especially around existing houses.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.</p> <p>It is correct to protect rural productive potential, but this can be achieved without imposing a total restriction on rural lifestyle properties.</p>	
<p><b>Rua Hatu Trust (S377)</b></p>	<p>S377.006</p>	<p>Subdivision</p>	<p>SUB-P8</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.</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 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>Sean Jozef Vercammen (S395)</b>	S395.006	Subdivision	SUB-P8	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 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> <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>Kerry-Anne Smith (S410)</b>	S410.006	Subdivision	SUB-P8	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 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> <li>• Make SNA mapping available publicly, even if it is not part of the PDP.</li> </ul>
<b>Roger Myles Smith (S411)</b>	S411.006	Subdivision	SUB-P8	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</p>	<p>Amend to:</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>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 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>Northland Federated Farmers of New Zealand (S421)</b></p>	<p>S421.175</p>	<p>Subdivision</p>	<p>SUB-P8</p>	<p>Oppose</p>	<p>Federated Farmers opposes policies SUB-P8 and SUB-P9 (inferred) as they are currently drafted in the proposed district plan. The policies only provide for subdivision in the rural environment in certain circumstances. There is no balance provided by the two policies between enabling the managed growth of the rural area</p>	<p>Delete Policies SUB-P8 and SUB-P9 and replace with new policies that address the issues of managed growth of rural areas, protection of highly productive land and the use of benefit lots</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>and the protection of highly productive land. Council also needs to consider the Benefit lots for environmental gains. For many rural landowners there is significant gain and drive if council was to promote biodiversity gains through the subdivision process. It is also recommended that the policies contained more recognition for the protection of highly productive soils. There is a significant amount of rural land in Kaipara that is highly productive, and which are significantly important to the economic, sustainable and growth prospects for the district.</p>	
<p><b>John Joseph and Jacqueline Elizabeth Matthews (S439)</b></p>	<p>S439.006</p>	<p>Subdivision</p>	<p>SUB-P8</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 Policy SUB-P8:</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 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</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						just Reserves Act and QEII covenants <ul style="list-style-type: none"> <li>• to make SNA mapping available publicly, even if it is not part of the PDP</li> </ul>
<b>LJ King Ltd (S464)</b>	S464.006	Subdivision	SUB-P8	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 the original SNA mapping. In fact, none of the methods in policy IB-P6 have been given effect under the PDP.</p>	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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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>LJ King Ltd (S464)</b>	S464.019	Subdivision	SUB-P8	Oppose	The amendment will allow for more circumstances where rural lifestyle blocks are enabled in the Rural Production Zone around existing houses.	Amend SUB-P8 to add more circumstances where rural lifestyle blocks can be allowed in the Rural Production Zone, especially around existing houses.
<b>Helmut Friedrich Paul Letz and Angelika Eveline Letz (S470)</b>	S470.006	Subdivision	SUB-P8	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 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</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>Michael Foy (S472)</b>	S472.008	Subdivision	SUB-P8	Support in part	with council struggling to provide urban amenities and people wanting to live independent of these services in rural areas without too much land to care for , it makes sense to allow small rural blocks	Amend policy SUB-P8, by adding more circumstances where rural lifestyle blocks can be allowed in the Rural Production Zone, especially around existing houses.
<b>Michael Foy (S472)</b>	S472.043	Subdivision	SUB-P8	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 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>
<b>Elbury Holdings (S485)</b>	S485.020	Subdivision	SUB-P8	Oppose	The amendment will allow for more circumstances where rural lifestyle blocks are enabled in the Rural Production Zone around existing houses.	Amend Policy SUB-P8, by adding more circumstances where rural lifestyle blocks can be allowed in the Rural Production Zone, especially around existing houses.
<b>Elbury Holdings (S485)</b>	S485.045	Subdivision	SUB-P8	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 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>
<b>Elbury Holdings (S519)</b>	S519.020	Subdivision	SUB-P8	Oppose	The amendment will allow for more circumstances where rural lifestyle blocks are enabled in the Rural Production Zone around existing houses.	Amend SUB-P8 to add more circumstances where rural lifestyle blocks can be allowed in the Rural Production Zone, especially around existing houses.
<b>Elbury Holdings (S519)</b>	S519.045	Subdivision	SUB-P8	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 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>
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527)</b>	S527.020	Subdivision	SUB-P8	Oppose	SUB-P8 and SUB-R6 create a type of subdivision called 'Environmental benefit subdivision' as a restricted discretionary activity. This appears to be poorly conceived provision - the protection of SNAs should be an essential prerequisite for any rural subdivision to be approved, not a means of getting additional lots.	Amend SUB-P8 to make protection of SNAs an essential prerequisite (inferred)
<b>Carbon Neutral NZ Trust (S529)</b>	S529.145	Subdivision	SUB-P8	Oppose	SUB-P8 create a type of subdivision called 'Environmental benefit subdivision' as a restricted discretionary activity. This appears to be poorly conceived provision - the protection of SNAs should be an essential prerequisite for any rural subdivision to be approved, not a means of getting additional lots.	Amend SUB-P8 as SNA protection should be an essential prerequisite for any rural subdivision to be approved, not a means of getting additional lots
<b>Elbury Holdings (S541)</b>	S541.006	Subdivision	SUB-P8	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 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> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<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>Elbury Holdings (S541)</b>	S541.018	Subdivision	SUB-P8	Oppose	The amendment will allow for more circumstances where rural lifestyle blocks are enabled in the Rural Production Zone around existing houses.	Amend Policy SUB-P8, by adding more circumstances where rural lifestyle blocks can be allowed in the Rural Production Zone, especially around existing houses.
<b>LJ King Limited (S543)</b>	S543.006	Subdivision	SUB-P8	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 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</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>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>LJ King Limited (S543)</b>	S543.019	Subdivision	SUB-P8	Oppose	The amendment will allow for more circumstances where rural lifestyle blocks are enabled in the Rural Production Zone around existing houses	Amend SUB-P8 to add more circumstances where rural lifestyle blocks can be allowed in the Rural Production Zone, especially around existing houses
<b>Kelvin Richard Horsford (S544)</b>	S544.006	Subdivision	SUB-P8	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 the original SNA mapping. In fact, none of</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,</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	<p>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>
LJ King Limited (S547)	S547.006	Subdivision	SUB-P8	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 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</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>landowners 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>LJ King Limited (S547)</b></p>	<p>S547.019</p>	<p>Subdivision</p>	<p>SUB-P8</p>	<p>Oppose</p>	<p>The amendment will allow for more circumstances where rural lifestyle blocks are enabled in the Rural Production Zone around existing houses</p>	<p>Amend SUB-P8 to add more circumstances where rural lifestyle blocks can be allowed in the Rural Production Zone, especially around existing houses</p>
<p><b>Rodney S Gates and Cherie R Gates (S569)</b></p>	<p>S569.006</p>	<p>Subdivision</p>	<p>SUB-P8</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> </ul>



SUMMARY OF SUBMISSIONS

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<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>Lynley Newport (S118)</b>	S118.003	Subdivision	SUB-P9	Oppose	The submitter considers that in SUB-P9 the use of the word "avoid" is too negative and restrictive and that the use of more positive terms can achieve the same outcome.	Amend SUB-P9 to read: Provide for rural lifestyle subdivision in the Rural Production zone, and for Rural Residential subdivision in the Rural Lifestyle zone where the development achieves the environmental outcomes required in the management plan subdivision rule.
<b>Bentzen Farm Limited (S167)</b>	S167.053	Subdivision	SUB-P9	Oppose	This policy is not needed with the new policy SUB-P8 sought by this submission.	Delete Policy SUB-P9
<b>Setar Thirty Six Limited (S168)</b>	S168.054	Subdivision	SUB-P9	Oppose	Policy SUB-P9 seeks to avoid subdivision rural lifestyle subdivision in the Rural Production zone and Rural residential subdivision in the Rural Lifestyle zone unless the development achieves the environmental outcomes required in the management plan subdivision rule. This policy is not needed with the new policy SUB-P8 sought by this submission.	Delete Policy SUB-P9
<b>Russell Protection</b>	S179.103	Subdivision	SUB-P9	Support		Retain SUB-P9

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
<b>Society (INC) (S179)</b>						
<b>The Shooting Box Limited (S187)</b>	S187.046	Subdivision	SUB-P9	Oppose	Policy SUB-P9 seeks to avoid subdivision rural lifestyle subdivision in the Rural Production zone and Rural residential subdivision in the Rural Lifestyle zone unless the development achieves the environmental outcomes required in the management plan subdivision rule. This policy is not needed with the new policy SUB-P8 sought by this submission.	Delete Policy SUB-P9
<b>Thomson Survey Ltd (S202)</b>	S202.003	Subdivision	SUB-P9	Support in part	SUB-P9 similarly uses the word "avoid". There are different ways to achieve what SUB-P9 is designed to achieve.	Amend SUB-P9 to read: " <b>Provide for</b> rural lifestylesubdivision in the Rural Production Zone, and for Rural Residential subdivision in the RuralLifestyle Zone where the development achieves the environmental outcomes required in the management plan subdivision rule."
<b>Matauri Trustee Limited (S243)</b>	S243.071	Subdivision	SUB-P9	Oppose	Policy SUB-P9 seeks to avoid rural lifestyle subdivision in the Rural Production zone and Rural residential subdivision in the Rural Lifestyle zone unless the development achieves the environmental outcomes required in the management plan subdivision rule. This policy is not needed with the new policy SUB-P8 sought by this submission.	Delete Policy SUB-P9
<b>Te Hiku Community Board (S257)</b>	S257.009	Subdivision	SUB-P9	Oppose	SUB-P9 overlaps with and duplicates the content of SUB-P8. We do not support the large title sizes in the rural zone. We submit that subdivision should allow lots to 4ha or smaller, and that the subdivision of smaller lots around existing houses be provided for.	Delete policy SUB-P9, which further limits rural lifestyle bocks in the Rural Production Zone.
<b>P S Yates Family Trust (S333)</b>	S333.046	Subdivision	SUB-P9	Oppose	Policy SUB-P9 seeks to avoid subdivision rural lifestyle subdivision in the Rural Production zone and Rural residential subdivision in the Rural Lifestyle zone unless the development achieves the	Delete Policy SUB-P9

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					environmental outcomes required in the management plan subdivision rule. This policy is not needed with the new policy SUB-P8 sought by this submission	
<b>Neil Construction Limited (S349)</b>	S349.012	Subdivision	SUB-P9	Oppose	A better outcome in these circumstances is to utilise the land more efficiently for rural residential use, adding much needed housing to Kerikeri in a way that does not impose any burden on the community in terms of providing or funding infrastructure.	delete SUB-P9 or amend to remove the wording in SUB-P9 relating to avoiding rural residential subdivision in the Rural Lifestyle Zone.
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.082	Subdivision	SUB-P9	Support	not stated	Retain SUB-P9 as notified
<b>Sean Frieling (S357)</b>	S357.009	Subdivision	SUB-P9	Oppose	<p>The new subdivision rules will severely restrict the ability to create small rural lots in the rural production zone.</p> <p>The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and the less productive land when it comes to subdivision.</p> <p>It is correct to protect rural productive potential, but this can be achieved without imposing a total restriction on rural lifestyle properties. We do not support the large title sizes in the rural zone. We submit that subdivision should allow lots to 4ha or smaller, and that the subdivision of smaller lots around existing houses be provided for.</p>	Delete policy SUB-P9, which further limits rural lifestyle bocks in the Rural Production Zone.
<b>Leah Frieling (S358)</b>	S358.009	Subdivision	SUB-P9	Oppose	<p>We do not support the large title sizes in the Rural Production zone. We submit that subdivision should allow lots to 4ha or smaller, and that the subdivision of smaller lots around existing houses be provided for.</p> <p>With Council struggling to provide urban amenities and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.</p>	Delete policy SUB-P9

SUMMARY OF SUBMISSIONS

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					It is correct to protect rural productive potential, but this can be achieved without imposing a total restriction on rural lifestyle properties.	
<b>Northland Federated Farmers of New Zealand (S421)</b>	S421.176	Subdivision	SUB-P9	Oppose	Federated Farmers opposes policies SUB-P8 and SUB-P9 (inferred) as they are currently drafted in the proposed district plan. The policies only provide for subdivision in the rural environment in certain circumstances. There is no balance provided by the two policies between enabling the managed growth of the rural area and the protection of highly productive land. Council also needs to consider the Benefit lots for environmental gains. For many rural landowners there is significant gain and drive if council was to promote biodiversity gains through the subdivision process. It is also recommended that the policies contained more recognition for the protection of highly productive soils. There is a significant amount of rural land in Kaipara that is highly productive, and which are significantly important to the economic, sustainable and growth prospects for the district.	Delete Policies SUB-P8 and SUB-P9 and replace with new policies that address the issues of managed growth of rural areas, protection of highly productive land and the use of benefit lots
<b>LJ King Ltd (S464)</b>	S464.020	Subdivision	SUB-P9	Oppose	The policy further limits rural lifestyle blocks in the Rural Production Zone and overlaps with and duplicates the content of SUB-P8.	Delete SUB-P9.
<b>Michael Foy (S472)</b>	S472.009	Subdivision	SUB-P9	Oppose	The new subdivision rules, requiring a minimum lot size of 8ha ( without a management plan) will severely restrict the ability to create small rural lots in the rural production zone. The effects of this restriction include: <ul style="list-style-type: none"> <li>- A reduction in vitality for rural communities</li> <li>- no longer allowing farmers to retire in their existing homes with a small area of land</li> <li>- the creation of 8ha blocks, which are too large for lifestyle blocks and too small to be productive</li> <li>- no longer allowing for the creation of appropriately sized and desirable lifestyle blocks</li> <li>- reduce the ability for rural landowners to provide small blocks for young family members to build on and enter the property market ( this is contrary to Council policies in relation to</li> </ul>	Delete policy SUB-P9, which further limits rural lifestyle blocks in the Rural Production Zone.

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					affordable housing reduced capacity for farmers to decrease their debt burdens by subdividing off small block of land that do not significantly add to the productivity of their farm. Where it is necessary to reduce debt by subdivision, subdividing off 8ha will diminish the productive capacity of the farm more than a smaller block.	
<b>Elbury Holdings (S485)</b>	S485.021	Subdivision	SUB-P9	Oppose	SUB-P9 overlaps with and duplicates the content of SUB-P8.	Delete policy SUB-P9, which further limits rural lifestyle bocks in the Rural Production Zone.
<b>Elbury Holdings (S519)</b>	S519.021	Subdivision	SUB-P9	Oppose	SUB-P9 overlaps with and duplicates the content of SUB-P8.	Delete policy SUB-P9, which further limits rural lifestyle bocks in the Rural Production Zone.
<b>Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527)</b>	S527.022	Subdivision	SUB-P9	Oppose	SUB-P9 and SUB-R7 encourage inappropriate subdivision in the rural production and lifestyle zones if the development achieves so-called environmental outcomes of the management plan subdivision rule. This provision is also poorly conceived. The management plan criteria proposed in Appendix 3 (APP3) are vague, low-reaching and don't set clear expectations for either developers, land owners, or planning officers. The proposed elements and criteria for Management Plans are less than we should expect for all subdivisions in today's world. We consider that management plan subdivisions, to date, have historically failed to achieve quality development or environmental outcomes. If the concept of management plan subdivision is retained, they criteria need to be greatly improved to provide superior environmental outcomes	Amend management plan subdivision criteria to improve environmental outcomes (inferred)
<b>Carbon Neutral NZ Trust (S529)</b>	S529.147	Subdivision	SUB-P9	Oppose	SUB-P9 and SUB-R7 encourage inappropriate subdivision in the rural production and lifestyle zones if the development achieves so-called environmental outcomes of the management plan subdivision rule. This provision is also poorly conceived. The management plan criteria proposed in Appendix 3 (APP3) are vague, low-	Delete this policy (inferred) If the concept of management plan subdivision is retained, the criteria need to be greatly improved to provide superior environmental outcomes.

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					reaching and don't set clear expectations for either developers, land owners, or planning officers. The proposed elements and criteria for Management Plans are less than we should expect for all subdivisions in today's world. We consider that management plan subdivisions, to date, have historically failed to achieve quality development or environmental outcomes. If the concept of management plan subdivision is retained, they criteria need to be greatly improved to provide superior environmental outcomes.	
<b>Elbury Holdings (S541)</b>	S541.019	Subdivision	SUB-P9	Oppose	SUB-P9 overlaps with and duplicates the content of SUB-P8.	Delete policy SUB-P9, which further limits rural lifestyle bocks in the Rural Production Zone.
<b>LJ King Limited (S543)</b>	S543.020	Subdivision	SUB-P9	Oppose	The policy further limits rural lifestyle bocks in the Rural Production Zone and overlaps with and duplicates the content of SUB-P8	Delete SUB-P9
<b>LJ King Limited (S547)</b>	S547.020	Subdivision	SUB-P9	Oppose	The policy further limits rural lifestyle bocks in the Rural Production Zone and overlaps with and duplicates the content of SUB-P8	Delete SUB-P9
<b>Russell Protection Society (INC) (S179)</b>	S179.104	Subdivision	SUB-P10	Support	support SUB P10 in particular in order to discourage backdoor non complying subdivisions of properties containing minor dwelling units	Retain SUB-P10
<b>Waka Kotahi NZ Transport Agency (S356)</b>	S356.083	Subdivision	SUB-P10	Support	not stated	Retain SUB-P10 as notified
<b>New Zealand Pork Industry Board (S55)</b>	S55.017	Subdivision	SUB-P11	Support in part	Subdivision policies should give effect to avoiding reverse sensitivity effects of subdivision, as per the section overview.	amend the potential for reverse sensitivity effects on lawfully established operations in the matters for consideration, as follows: Manage 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,

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						<p>density, design and character of the environment and purpose of the zone;</p> <p>b.the location, scale and design of buildings and structures;</p> <p>c.the adequacy and capacity of available or programmed development infrastructure to accommodate the proposed activity; or the capacity of the site to cater for on-site infrastructure associated with the proposed activity;</p> <p>d.managing natural hazards;</p> <p>e.Any adverse effects on areas with historic heritage and cultural values, natural features and landscapes, natural character or indigenous biodiversity values; and</p> <p>f.any historical, spiritual, or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6.<b>g.The potential for reverse sensitivity effects that would prevent or adversely affect activities already established on land from continuing to operate.</b></p>
<p><b>Horticulture New Zealand (S159)</b></p>	<p>S159.069</p>	<p>Subdivision</p>	<p>SUB-P11</p>	<p>Support in part</p>	<p>The policy lists the matters to be considered for subdivision applications. Potential for reverse sensitivity should also be included as a matter for consideration</p>	<p>Amend Policy SUB-P11 by adding: <b>g) potential for reverse sensitivity effects</b></p>
<p><b>Bentzen Farm Limited (S167)</b></p>	<p>S167.054</p>	<p>Subdivision</p>	<p>SUB-P11</p>	<p>Oppose</p>	<p>The matters set out in Policy SUB-P11 are better placed as assessment matters/criteria against which applications are to be assessed.</p>	<p>Delete Policy SUB-P11</p>

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<b>Setar Thirty Six Limited (S168)</b>	S168.055	Subdivision	SUB-P11	Oppose	The matters set out in Policy SUB-P11 are information requirements for assessment of applications and do not prescribe policy as such. They are better placed as assessment matters/criteria against which applications are to be assessed.	Delete Policy SUB-P11
<b>Russell Protection Society (INC) (S179)</b>	S179.105	Subdivision	SUB-P11	Support in part	there is a need to consider the cumulative effects of subdivision, particularly within coastal rural and special purpose areas	Amend SUB-P11 to require council to have regard to the cumulative effects that subdivision would have upon the values of the area in question
<b>The Shooting Box Limited (S187)</b>	S187.047	Subdivision	SUB-P11	Oppose	The matters set out in Policy SUB-P11 are information requirements for assessment of applications and do not prescribe policy as such. They are better placed as assessment matters/criteria against which applications are to be assessed.	Delete Policy SUB-P11
<b>Matauri Trustee Limited (S243)</b>	S243.072	Subdivision	SUB-P11	Oppose	The matters set out in Policy SUB-P11 are information requirements for assessment of applications and do not prescribe policy as such. They are better placed as assessment matters/criteria against which applications are to be assessed.	Delete Policy SUB-P11
<b>P S Yates Family Trust (S333)</b>	S333.047	Subdivision	SUB-P11	Oppose	The matters set out in Policy SUB-P11 are information requirements for assessment of applications and do not prescribe policy as such. They are better placed as assessment matters/criteria against which applications are to be assessed.	Delete Policy SUB-P11
<b>Neil Construction Limited (S349)</b>	S349.013	Subdivision	SUB-P11	Oppose	A better outcome in these circumstances is to utilise the land more efficiently for rural residential use, adding much needed housing to Kerikeri in a way that does not impose any burden on the community in terms of providing or funding infrastructure.	delete SUB-P11 or amend to delete the criteria in SUB-P11.



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<b>Kapiro Conservation Trust (S442)</b>	S442.150	Subdivision	SUB-P11	Support in part	Policy SUB-P11 does not address all the effects that need to be addressed to protect indigenous biodiversity.	Insert the following to the list of matters to be considered when Council assesses land use and subdivision consent applications: 1. The quality and extent of the indigenous ecosystems and elements present 2. The potential impact of the proposed activity on the biodiversity values of the native vegetation present on, and in the vicinity of, the property 3. The type and extent of legal and practical protection being provided to protect indigenous ecosystems and elements 4. The type and scale of ecological restoration and protective management being proposed (e.g., pest control) 5. The potential hazards posed by the construction and ongoing new activities on at-risk wildlife 6. Controls on pet ownership to protect at-risk wildlife
<b>Pacific Eco-Logic (S451)</b>	S451.006	Subdivision	SUB-P11	Support in part	Policy SUB-P11 does not address all the effects that need to be addressed to protect indigenous biodiversity	Insert the following to the list of matters to be considered when Council assesses land use and subdivision consent applications: 1. The quality and extent of the indigenous ecosystems and elements present 2. The potential impact of the proposed activity on the biodiversity values of the native vegetation present on, and in the vicinity of, the property 3. The type and extent of legal and practical protection being provided to protect indigenous

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						<p>ecosystems and elements</p> <p>4. The type and scale of ecological restoration and protective management being proposed (e.g., pest control)</p> <p>5. The potential hazards posed by the construction and ongoing new activities on at-risk wildlife</p> <p>6. Controls on pet ownership to protect at-risk wildlife</p>
<p><b>Transpower New Zealand Ltd (S454)</b></p>	<p>S454.094</p>	<p>Subdivision</p>	<p>SUB-P11</p>	<p>Not Stated</p>	<p>Transpower considers the subdivision policy requires amendment to ensure that it addresses the need to manage subdivision in the National Grid Subdivision Corridor.</p>	<p>Amend SUB-P11 as follows:            Manage 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:</p> <ul style="list-style-type: none"> <li>a. consistency with the scale, density, design and character of the environment and purpose of the zone;</li> <li>b. the location, scale and design of buildings and structures;</li> <li>c. the adequacy and capacity of available or programmed development infrastructure to accommodate the proposed activity; or the capacity of the site to cater for on-site infrastructure associated with the proposed activity;</li> <li>d. managing natural hazards;</li> <li>e. Any adverse effects on areas with historic heritage and cultural values, natural features and landscapes, natural character or indigenous biodiversity values; and</li> <li>f. any historical, spiritual, or cultural association held by tangata whenua, with regard to</li> </ul>

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						the matters set out in Policy TW-P6; <b>g. managing effects on the National Grid from subdivision within the National Grid Subdivision Corridor.</b>
<b>Waiaua Bay Farm Limited (S463)</b>	S463.045	Subdivision	SUB-P11	Oppose	Sub-clauses (a) to (f) are a list of assessment matters that are inappropriate to be included in a policy. They do not provide direction about how to achieve the overarching objectives. WBF recommends deletion of the policy and reliance on the other subdivision policies instead. If necessary, the assessment criteria can be relocated to rules and standards later in this chapter.	Delete Policy SUB-P11
<b>Top Energy Limited (S483)</b>	S483.166	Subdivision	SUB-P11	Not Stated	Top Energy seeks to ensure the protection of all electricity infrastructure, noting the interdependency of the system and the importance of lines other than 110kV and 33kV line which Top Energy has sought be mapped as Critical Electricity Lines. To achieve this, Top Energy seeks that a further matter of consideration to be included that required consideration of potential reverse sensitivity effects on infrastructure at the time of subdivision.  This will provide a trigger for processing planners to encourage consultation with Top Energy where any subdivision is proposed where not captured by SUB - R9 & 10. While there is no overlay to trigger this, above ground infrastructure will be visible when site visits are undertaken.	Amend policy SUB - P11 to include the follow additional matter of discretion: <b>any potential for reverse sensitivity effects on electricity infrastructure.</b>
<b>Spark New Zealand Trading Limited and Vodafone New Zealand</b>	S517.002	Subdivision	SUB-P11	Support	Requirement in Policies SUB-P6 and SUB-P11 for subdivisions to have electricity and telecommunication connections is supported	Retain Policy SUB-P11

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<b>Limited (S517)</b>						
<b>Bayswater Inn Ltd (S29)</b>	S29.009	Subdivision	Rules	Oppose	Coastal Environment Overlay - With regard to the inclusion of 40 Marsden Road, Paihia, in the coastal environment overlay, the PDP has introduced new rules which have an impact on the subdivision status, along with the future development of the sites. The creation of lots in the coastal environment would in terms of subdivision be assessed as a Discretionary Activity, whereas it is currently a Controlled Activity. Some of the restrictions on future development are illogical and unreasonable	Amend the coastal environment provisions to exempt existing/established urban areas (including 40 Marsden Road, Paihia) from the restrictions on future development including: <ul style="list-style-type: none"> <li>• maximum floor area of 300 m<sup>2</sup></li> <li>• maximum extension of 20%</li> <li>• limits on excavation and filling</li> <li>• maximum height of 5 metres</li> <li>• additional controls on indigenous vegetation removal</li> <li>• subdivision as a discretionary activity</li> </ul>
<b>Martin John Yuretich (S40)</b>	S40.017	Subdivision	Rules	Support in part	Rule GRZ-R9 does not take into consideration the capacity of existing infrastructure, namely water supply, stormwater and wastewater, as required under Policy GRZ-P3. This rule could result in extra loadings on already straining infrastructure, which could result in discharges of untreated sewage to waterways or the sea, reductions in quality or shortages of drinking water, or exacerbated damage during stormwater events.	Amend Rule GRZ-R9 to only allow multi-unit development in areas where all infrastructure has been upgraded and maintained to allow for the maximum development potential under this rule and subdivision rules.
<b>Joel Vieviorka (S41)</b>	S41.017	Subdivision	Rules	Oppose	Rule GRZ-R9 does not take into consideration the capacity of existing infrastructure, namely water supply, stormwater and wastewater, as required under Policy GRZ-P3. This rule could result in extra loadings on already straining infrastructure, which could result in discharges of untreated sewage to waterways or the sea, reductions in quality or	Amend Rule GRZ-R9 to only allow multi-unit development in areas where all infrastructure has been upgraded and maintained to allow for the maximum development potential under this rule and subdivision rules.

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					shortages of drinking water, or exacerbated damage during stormwater events.	
<b>Imerys Performance Minerals Asia Pacific (S65)</b>	S65.016	Subdivision	Rules	Not Stated	SUB-R16 Subdivision of a site containing a mineral extraction overlay does not appropriately provide for subdivision which can impact its existing or future operations. A new rule is required to protect mining activities from potential sterilisation.	insert new rules which requires subdivision within 100m of the Minerals Zone to consider and assess effects directly to the zone, any existing activities, and whether the operational quarry, or underlying owner of the Mineral Zone site is an 'affected party' under the RMA.
<b>Kairos Connection Trust and Habitat for Humanity Northern Region Ltd (S138)</b>	S138.022	Subdivision	Rules	Support in part	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.
<b>Julianne Sally Bainbridge (S163)</b>	S163.002	Subdivision	Rules	Oppose	All subdivision sizes need to have a Management Plan to bring Lifestyle Blocks and Urban area into line with rural. Healthy soils make healthy land, animals, people and waterways. The storage of excess rainfall to be applied to the land in times of moisture deficit allows the soils to stay in a sponge like state and avoid the dry arid state which washes and blows away to add sediment.	Insert a requirement for all subdivision to have a management plan
<b>Julianne Sally Bainbridge (S163)</b>	S163.003	Subdivision	Rules	Oppose	The storage of excess rainfall to be applied to the land in times of moisture deficit allows the soils to stay in a sponge like state and avoid the	Insert a requirement all subdivision must have a water

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					dry arid state which washes and blows away to add sediment. All subdivision must have a water management plan to slow the leaving of the water from the land.	management plan
<b>Reuben Wright (S178)</b>	S178.007	Subdivision	Rules	Support in part	There is no rule in the Subdivision Chapter that clearly identifies requirements as they relate to traffic or access.	[Amend to add rule in the Subdivision Chapter that clearly identifies requirements as they relate to traffic or access - inferred].
<b>Our Kerikeri Community Charitable Trust (S272)</b>	S272.013	Subdivision	Rules	Support in part	PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more	Insert new rule (inferred) requiring esplanade reserves/strips when subdivision creates lots of 4ha or more when one of the following situations applies: <ul style="list-style-type: none"> <li>•the owner agrees to provide the land on a voluntary basis, or</li> <li>•a third party agrees to provide funds to compensate the land owner for the land (at normal market value), or</li> <li>•the land is included in a development agreement or development contributions or financial contributions (under the RMA or LGA) or other arrangement.</li> </ul>
<b>Our Kerikeri Community Charitable Trust (S338)</b>	S338.011	Subdivision	Rules	Not Stated	Having relevant infrastructure in place should be a prerequisite for future development. The provision of necessary infrastructure must be high priority in PDP policies/rules. Given the Council's funding constraints, we consider that developers should normally be required to provide the necessary infrastructure, including items such as on-site community wastewater systems	Amend the rules to emphasise the requirement for developer input for infrastructure servicing private land use and subdivision
<b>Our Kerikeri Community Charitable Trust (S338)</b>	S338.072	Subdivision	Rules	Not Stated	No specific reason for this decision sought.	Amend the PDP to wherever possible require or at least promote the creation of community open spaces, green open spaces, green corridors and

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						linkages to support active transport, amenity and community wellbeing.
<b>Sapphire Surveyors Limited (S348)</b>	S348.014	Subdivision	Rules	Support in part	Rule GRZ-R9 does not take into consideration the capacity of existing infrastructure, namely water supply, stormwater and wastewater, as required under Policy GRZ-P3. This rule could result in extra loadings on already straining infrastructure, which could result in discharges of untreated sewage to waterways or the sea, reductions in quality or shortages of drinking water, or exacerbated damage during stormwater events.	Amend Rule GRZ-R9 to only allow multi-unit development in areas where all infrastructure has been upgraded and maintained to allow for the maximum development potential under this rule and subdivision rules.
<b>The BOI Watchdogs (S354)</b>	S354.006	Subdivision	Rules	Oppose	To address the concerns, detailed in the BOI Watchdog submission about Council, staff and its processes and resource management practices over pet ownership. Refer to the submission for full details.	Delete any rules that ban or restrict dogs on our sub-divisions, immediately, until the elected Council and community have obtained the following information, and had an opportunity to make decisions on it, with genuine community consultation: <ul style="list-style-type: none"> <li>- Information about the extent of the dog bans and restrictions across Northland, including any restrictions or bans which may apply on Māori land; clarity about the nature of those restrictions, and; clarity around the number of years that such restrictions have taken place.</li> <li>- External, independent, legal opinion on whether the use of the RMA and sub-division policies and practices to ban pets, to the extent that has been occurring, is legally appropriate.</li> <li>- External, independent legal review of FNDC legal department's action against Donna Doolittle's Animal Rescue in terms of (i) alleged bias shown against her within the animal</li> </ul>

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						<p>management department, and (ii) the differential application of the word 'kennel', with all its attendant obligations, between FNDC's resource application for its Horeke pound, versus Donna Doolittle's Animal Rescue.</p> <ul style="list-style-type: none"> <li>- Review of the dog bans and restrictions at the Ngawha Industrial Enterprise Park (NIEP) and Quail Ridge Retirement Village, to assess impact on the community and surrounding properties.</li> <li>- External, independent, academic review of the two documents FNDC currently uses 'internally' to ban dogs, by a non-DOC funded/controlled organisation, which has experience of dog behaviour (e.g. Massey University). Those documents are the 'Practice Note For Significant Indigenous Flora and Fauna' and the 'Bay of Islands Kiwi Distribution Map Support Document'. We wish to have input to that review.</li> <li>- A summary of positive alternatives to the banning and restricting of dogs on sub-divisions which would provide safety for wildlife, while also allowing responsible dog owners to live with their canine family members. This should include review of whether breeder oversight and regulations need strengthening, and whether there is support for mandatory de-sexing of pet dogs, when they are not owned by breeders or farmers.</li> </ul>



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						<p>- An analysis of the potential unintended consequences of FNDC's dog bans and restrictions, including (i) the impact on the availability of rental and sale properties for dog owners, including information from developers and real estate agents, (ii) the impact on the wellbeing of families who are forced to relinquish their pets to obtain housing, and (iii) whether community acceptance of the release of kiwi would be adversely affected if the community was aware of the implications this has on their rights to pet ownership. of dog behaviour (e.g. Massey University). Those documents are the 'Practice Note For Significant Indigenous Flora and Fauna' and the 'Bay of Islands Kiwi Distribution Map Support Document'. We wish to have input to that review.</p> <p>- A summary of positive alternatives to the banning and restricting of dogs on sub-divisions which would provide safety for wildlife, while also allowing responsible dog owners to live</p>
<p><b>Waka Kotahi NZ Transport Agency (S356)</b></p>	<p>S356.088</p>	<p>Subdivision</p>	<p>Rules</p>	<p>Oppose</p>	<p>There appear to be no rules or assessment criteria that manage access or transport effects, i.e. safe and fit for purpose access, network impacts, and the provision of transport infrastructure. This is a fundamental control of subdivision. This is critical for subdivision on the State highway network given the high-speed environment. Waka Kotahi has its own access</p>	<p>Insert rules and assessment criteria relating to the provision and management of access and transport effects of subdivision.</p>

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					design standards, and seeks to minimise side friction, thereby consolidating vehicle crossings and encouraging access from a local road where possible. There should also be circumstances in which active mode connections are provided for, and consideration of how this may link to public transport infrastructure where practicable.	
<b>Director-General of Conservation (Department of Conservation ) (S364)</b>	S364.003	Subdivision	Rules	Oppose	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. 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.	Amend the Subdivision chapter to include more stringent controls to allow for the consideration and scheduling of SNAs in the subdivision chapter.
<b>Ventia Ltd (S424)</b>	S424.012	Subdivision	Rules	Oppose	SUB-R16 Subdivision of a site containing a mineral extraction overlay does not appropriately provide for subdivision which can impact its existing or future operations. A new rule is required to protect mining activities from potential sterilisation.	Insert a new rule which requires subdivision within 100m of the Mineral Extraction Overlay to consider and assess effects directly to the zone, any existing activities, and whether the operational quarry, or underlying owner of the Mineral Extraction Overlay site is an 'affected party' under the RMA.
<b>Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)</b>	S425.041	Subdivision	Rules	Support in part	In general, PHTTCCT support well-connected development, and future transport networks (see sub#4) being provided at the time of subdivision. Given the lack of spatial planning incorporated into the plan, it is considered that requiring developers to show how any future transport networks will be accommodated by the development is critical to future proof the District and ensure an integrated well connected transport network. Depending on the scale of development this could include requiring setbacks from indicative roads/cycleways as shown/described in any future or existing) strategies/spatial plans/annual plan be provided,	Amend the subdivision chapter to ensure that provision for, and connectivity with future transport networks is demonstrated at subdivision.

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					or road connections provided at boundaries of the developments.	
<b>Kapiro Residents Association (S427)</b>	S427.010	Subdivision	Rules	Support in part	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.	Amend to require new subdivisions and developments to provide connected walkways and cycleways that will contribute to future networks of walkways and cycleways [inferred].
<b>Kapiro Residents Association (S427)</b>	S427.040	Subdivision	Rules	Support in part	No specific reason for this decision sought.	Amend the PDP to wherever possible require or at least promote the creation of community open spaces, green open spaces, green corridors and linkages to support active transport, amenity and community wellbeing.
<b>Kapiro Residents Association (S428)</b>	S428.011	Subdivision	Rules	Support in part	We support the principle of PDP provisions controlling the area of impermeable surface per site, and consider it is probably also necessary to monitor and limit the total cumulative impermeable area in residential/urban zones.	Amend to provide for greater limits on impermeable areas (and/or requirements for minimum permeable areas) for subdivision, use and development. In urban/residential zones, it will also be necessary to adopt measures to limit the cumulative total impermeable surface and/or protect a specified cumulative total permeable area.
<b>Kapiro Residents Association (S428)</b>	S428.014	Subdivision	Rules	Support in part	<p>It should be encouraged in the form of well-designed two or three storey buildings, for example, with requirements for permeable open areas including garden/landscaped ground. Developments should use permeable materials wherever feasible for surfaces such as driveways, paths.</p> <p>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</p>	<p>Amend PDP to include objectives, policies and rules/standards that require best practice environmentally sustainable techniques for new developments, including -</p> <ul style="list-style-type: none"> <li>• Permeable materials wherever feasible for surfaces such as driveways, paths etc.</li> </ul>

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					<p>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.</p> <p>Passive heating and cooling designs, for example, reduce energy consumption and the on-going costs of heating/cooling. Solar panels with batteries, for example, can be purchased on lease-to-buy schemes so that the owner/occupier only pays the amount that they would have paid anyway for grid electricity. Additional electricity generation by households will be essential for powering EVs in future because current national generation capacity is not sufficient.</p>	<ul style="list-style-type: none"> <li>• Best practice for lowest environmental impact and water sensitive designs, requiring greywater recycling techniques and other technologies to ensure efficient use of water, rain storage tanks for properties connected to a public water supply, additional water storage for buildings that rely solely on roof water (to cope with drought), and other measures</li> <li>• Renewable energy technologies and energy-efficient technologies, and similar requirements that foster improved environmental design/technologies and lower lifecycle climate impacts</li> <li>• Specified area (percentage) of tree canopy cover and green corridors should be required within new subdivisions. These will be increasingly important for shade/cooling for buildings and pedestrians in future.</li> </ul>
<b>John Andrew Riddell (S431)</b>	S431.069	Subdivision	Rules	Not Stated	<p>Well designed subdivision is an important component of achieving sustainable use and development of natural and physical resources, and in establishing and continuing character and sense of place.</p> <p>There is an inappropriate emphasis on ensuring</p>	<p>Revise the objectives, policies and provisions to better provide for cycling and active transport and walking in urban areas, settlements and their surrounds</p>

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					that vehicle requirements and needs are provided for in the subdivision rules. In urban areas and settlements and in their surrounds good resource management practice is for increased provision for cycling and other active transport and for walking access. Indeed, this is a necessary measure to help mitigate and adapt to the effects of climate change.	
<b>Kapiro Conservation Trust (S442)</b>	S442.007	Subdivision	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 to require consent conditions for fencing on the boundaries of public land, such as esplanadereserve, and around areas of wetlands and waterways. Consent conditions for areas of significant vegetation/habitat etc. should set high standards of protection for indigenous vegetation, kiwi, at risk/threatened species and biodiversity, including appropriate types of fencing, predator control, protection and restoration of native vegetation, weed control, restrictions on planting exotic vegetation, etc. Covenants should be legally binding in perpetuity and should include provisions for monitoring implementation and enforcement.
<b>Kapiro Conservation Trust (S442)</b>	S442.151	Subdivision	Rules	Support in part	The existing rules are generally supported.  Additional rules are needed to address the protection of indigenous vegetation and habitats of indigenous fauna for subdivisions other than environmental benefit lots.	Insert additional rules for subdivisions, other than environmental benefit lots, to address the protection of indigenous vegetation and habitats of indigenous fauna. These rules should include 1. The protection of significant indigenous vegetation and significant habitats of indigenous fauna (including the balance lot) as part of a subdivision

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						2. The requirement for cat and/or dog-free subdivision in areas of particular importance for vulnerable indigenous wildlife (e.g., kiwi, matuku, shorebirds)
<b>Kapiro Conservation Trust (S445)</b>	S445.014	Subdivision	Rules	Support in part	<p>As noted, there is increasing need to support connectivity and active modes of transport. RMA (s77, s230, s237F etc.) specifically allow councils to include a DP rule that requires esplanade when lots of 4 ha or more are created by subdivision:</p> <p>'A territorial authority may include a rule in its district plan which provides that in respect of any allotment of 4 hectares or more created when land is subdivided, esplanade reserves or esplanade strips, of the width specified in the rule, shall be set aside or created, as the case may be, under section 230(5).' (RMA s77(2))</p> <p>Voluntary contribution: RMA s237F requires the council to compensate the landowner for esplanade associated with larger lots - unless the landowner agrees not to take compensation, as voluntary action.</p> <p>In addition, s200(1) of the Local Government Act 2002 allows developers to provide a reserve voluntarily, and s200(2) allows councils to accept voluntary contributions for reserves that are not included in a development contribution: 'This subpart does not prevent a territorial authority from accepting from a person, with that person's agreement, additional contributions for reserves...'</p> <p>Third party funding: In addition, s200(1)(c) of LGA 2002 allows for a third party to fund a reserve (provided that the reserve is not included in a development contribution): 'a third party has funded or provided, or undertaken to fund or provide, the same reserve...'</p> <p>This potentially opens the door for a benefactor or community group to raise funds for specific</p>	<p>Insert new rule (inferred) to require esplanade reserves/strips when subdivision creates lots of 4ha or more (as allowed under RMA s77, s230, etc.) when one of the following situations applies:</p> <ul style="list-style-type: none"> <li>- the owner agrees to provide the land on a voluntary basis, or</li> <li>- a third party agrees to provide funds to compensate the land owner for the land (at normal market value), or</li> <li>- the land is included in a development agreement or financial contributions (under the RMA or LGA) or other arrangement.</li> </ul>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>parcels of esplanade land.</p> <p>Our group considers that DP Policies/Rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more (as allowed under RMA s77, s230, etc.) when one of the following situations applies:</p> <p>(a) the owner agrees to provide the land on a voluntary basis, or</p> <p>(b) a third party provides funds to compensate the land owner for the land (at normal market value), or</p> <p>(c) the land is included in a development agreement or development contributions or financial contributions (under the RMA or LGA).</p>	
<b>Kapiro Conservation Trust (S449)</b>	S449.012	Subdivision	Rules	Support in part	<p>Having relevant infrastructure in place should be a prerequisite for future development. The provision of necessary infrastructure must be high priority in PDP policies/rules. Given the Council's funding constraints, we consider that developers should normally be required to provide the necessary infrastructure, including items such as on-site community wastewater systems</p>	Amend the rules to emphasise the requirement for developer input for infrastructure servicing private land use and subdivision
<b>Kapiro Conservation Trust (S449)</b>	S449.069	Subdivision	Rules	Support in part	No specific reason for this decision sought.	Amend the PDP to wherever possible require or at least promote the creation of community open spaces, green open spaces, green corridors and linkages to support active transport, amenity and community wellbeing.
<b>Pacific Eco-Logic (S451)</b>	S451.007	Subdivision	Rules	Support in part	<p>The existing rules are generally supported</p> <p>Additional rules are needed to address the protection of indigenous vegetation and habitats of indigenous fauna for subdivisions other than environmental benefit lots.</p>	<p>Insert additional rules for subdivisions, other than environmental benefit lots, to address the protection of indigenous vegetation and habitats of indigenous fauna.</p> <p>These rules should include</p> <p>1. The protection of significant indigenous vegetation and significant habitats of indigenous fauna (including the balance lot)</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						as part of a subdivision 2. The requirement for cat and/or dog-free subdivision in areas of particular importance for vulnerable indigenous wildlife (e.g., kiwi, matuku, shorebirds)
<b>Ngā Tai Ora - Public Health Northland (S516)</b>	S516.055	Subdivision	Rules	Not Stated	<p>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.</p> <p>Ngā Tai Ora consider that SUB-R8 is ineffective and inefficient. The rule requires building platforms, access and services to be located wholly outside of any area on site which is identified as land susceptible to land instability. Land susceptible to land instability is not mapped in the PDP, instead the PDP provides a complicated definition which requires applicants to undertake individual mapping of their own site.</p> <p>Ngā Tai Ora, consider that this method is onerous, placing considerable cost on landowners particularly when provisions of affordable, safe and healthy housing is essential in the Far North District.</p>	<p>Insert rules applying to areas of risk which are appropriately identified through further mapping of land instability and where the potential risk of land instability throughout the District is understood.</p> <p>Or alternatively: Amend the definition of land identified as susceptible to land instability, to be easily understandable and identifiable. Amend Rule SUB-R8 to locate building platforms, access and services in the least as risk portion of the parent site.</p>