



SECTION 42A REPORT

Part 1 and General/ Miscellaneous

1.	Executive summary	3
2.	Introduction.....	4
	2.1 Author and qualifications	4
	2.2 Code of Conduct	4
3.	Scope/Purpose of Report.....	5
4.	Statutory Requirements.....	5
	4.1 Statutory documents	5
	4.1.1 Resource Management Act.....	5
	4.1.2 National Policy Statements.....	6
	4.2 Council’s Response to Current Statutory Context.....	7
	4.2.1 Iwi Management Plans – Update.....	8
	4.3 Section 32AA evaluation	8
	4.4 Procedural matters.....	9
	4.4.1 Withdrawn Submission Points.....	9
	4.4.2 Late Submission	9
	4.4.3 Further submissions rejected.....	10
	4.4.4 Hearings timetable	10
5.	Consideration of submissions received	10
	5.1 Overview of submissions received.....	10
	5.2 Officer Recommendations	11
	5.2.1 Key Theme 1: Whole of plan submissions.....	11
	5.2.2 Key Theme 2: Part 1 Introduction.....	14
	5.2.3 Key Theme 3: How the Plan Works.....	17
	5.2.4 Key Theme 4: National Direction Instruments	23
	5.2.5 Key Theme 5: Plan wide submissions.....	24
	5.2.6 Key Theme 6: New Chapters	33
	5.2.7 Key Theme 7: General Clarifications.....	35
	5.2.8 Key Issue 8: Submissions that sit outside the scope of the district plan review.....	37
6.	Conclusion.....	41



Appendix 1: Recommended amendments to Part 1 and General/Miscellaneous chapter

Appendix 2: Recommended decisions on submissions to Part 1 and General/Miscellaneous chapter

List of Abbreviations

Submitters

Submitter Number	Abbreviation	Full Name of Submitter
S335	Oil Companies	BP Oil New Zealand Limited, Mobil Oil New Zealand Limited, Z Energy Limited
S368	FNDC	Far North District Council
S512	FENZ	Fire and Emergency New Zealand
S363	Foodstuffs	Foodstuffs North Island Limited
S561	Kāinga Ora	Kāinga Ora Homes and Communities
S138	Kairos Connection Trust	Kairos Connection Trust and Habitat for Humanity Northern Region Ltd
S389	Taituha, Tane & Apiata	Merata Kawharu Taituha, Renata Tane, Albie Apiata, Billie Taituha and Hirini Tane
S421	Federated Farmers	Northland Federated Farmers of New Zealand
S359	NRC	Northland Regional Council
S344	Paihia Properties	Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd
S425	Twin Coast Cycle Trail	Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust
S511	Forest & Bird	Royal Forest and Bird Protection Society of New Zealand
S60	Wai Calimant Groups	Wai 2003 and Wai 250 Claimant Groups Te Wahapu and Hokianga

Others

Abbreviation	Full Term
FNDC	Far North District Council
NPS	National Policy Statement
PDP	Proposed District Plan
RMA	Resource Management Act
RPS	Regional Policy Statement



1. Executive summary

The Far North Proposed District Plan ("PDP") was publicly notified in July 2022. Part 1 of the District Plan is comprised of Introduction, How the Plan Works, Interpretation, National Direction Instruments and Tangata Whenua sections. This report addresses submissions against all sections of Part 1 other than Interpretation and Tangata Whenua sections.

This report also addresses general and miscellaneous submissions.

This report has been prepared in accordance with Section 42A of the Resource Management Act ("RMA") and outlines recommendations in response to the relief sought in submissions. This report is intended to both assist the Hearings Panel to make decisions on the submissions and further submissions on the PDP, and also to provide submitters with an opportunity to understand how their submissions have been evaluated and recommendations made by officers prior to the hearing.

89 original submissions (with 199 individual submission points) and 206 further submissions (with 739 individual submission points) were received on the Part 1 and General/ Miscellaneous topic.

The submissions can largely be categorised into several key themes:

Plan development

- Whole of Plan Submissions
- Introduction
- How the Plan Works
- National Direction Instruments
- Plan Wide Submissions
- New Chapters
- General Clarifications
- Submissions that sit outside the scope of the District plan

The key changes recommended in this report relate to:

- Improvements assist in clarity and directiveness.
- Updates to address the introduction of National Policy statements.
- Minor edits for consistency and clarity



2. Introduction

2.1 Author and qualifications

1. My full name is Sarah Ann Trinder, and I am a Consultant Planner at Barker and Associates, who is assisting the District Planning Team at Far North District Council with the District Plan Review.
2. I hold the qualification of a Bachelor of Science (Honours), Majoring in Geography, from The University of Auckland in 2010. I am an Associate member of the New Zealand Planning Institute.
3. I have 13 years' experience in planning and resource management including policy evaluation and development, and associated Section 32 assessments; evidence preparation, and the processing of resource consent applications, outline plans and notices of requirement. I have worked in planning at government authorities including Auckland Council (2011-2015) and Far North District Council (2015-2023). During this time, I was involved in the development of the Auckland Unitary Plan, and the Far North District Plan.
4. I work at Barker and Associates which represents a number of clients who are submitters on the PDP. I did not work for Barker and Associates during the original submission process. To manage this perceived conflict of interest between our work on behalf of local authorities and submitters, we ensure that there is clear separation of staff within my organisation, and I have not been involved in any in private submitter work. The views expressed within this report are my own professional opinions and not that of my employer or their clients. Further, the report has been reviewed by staff at FNDC to ensure completeness and appropriateness.
5. The submitters Barker and Associates represent that are relevant to the declaration of perceived conflict of interest are as follows:
 - Top Energy (S483)
 - Foodstuffs (S363)
 - Paihia Properties (3S44)
 - Twin Coast Cycle Trail (S425)
 - Nga Tai Ora – Public Health Northland (S516)
 - Te Aupouri Commercial Development Ltd (S339)
 - Te Whatu Ora - Health New Zealand, Te Tai Tokerau (S42)

2.2 Code of Conduct

6. I confirm that I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 and that I have complied with it when preparing this report. Other than when I state that I am relying on



the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

7. I am authorised to give this evidence on the Council's behalf to the Proposed District Plan ("PDP") hearings commissioners ("Hearings Panel").

3. Scope/Purpose of Report

8. This report has been prepared in accordance with Section 42A of the RMA to:

- assist the Hearings Panel in making their decisions on the submissions and further submissions on the PDP; and
- provide submitters with an opportunity to consider how their submissions have been evaluated and recommendations made by officers, prior to the hearing.

9. This report responds to submissions on:

- a) Part 1 Introduction Chapter;
- b) Part 1 How the Plan Works Chapter;
- c) Part 1 Natural Direction Instruments Chapter; and
- d) General/Miscellaneous matters.

4. Statutory Requirements

4.1 Statutory documents

10. I note that the Overview Section 32 report provides a detailed record of the relevant statutory considerations applicable to the Part 1 and General / Miscellaneous topic.

11. However, it is important to highlight the higher order documents which have been subject to change since notification of the PDP which must be given effect to and are relevant to the Part 1 and General / Miscellaneous topic.

4.1.1 Resource Management Act

12. The Government elected in October 2023, has repealed both the Spatial Planning Act 2023 and Natural and Built Environment Act 2023 on the 22of December 2023 and has reinstated the RMA as Zealand's primary resource management policy and plan making legislation. The Government has indicated that the RMA will ultimately be replaced, with work on replacement legislation to begin in 2024. The government has indicated that this replacement legislation will be introduced to parliament this term of government (i.e. before the next central government election in 2026). However, at the time of writing, details of the new legislation and exact



timing are unknown. The RMA continues to be in effect until new replacement legislation is passed.

4.1.2 National Policy Statements

4.1.2.1 National Policy Statements Gazetted since Notification of the PDP

13. The PDP was prepared to give effect to the National Policy Statements that were in effect at the time of notification (27 July 2022). This section provides a summary of the National Policy Statements, relevant to Part 1 and General/Miscellaneous that have been gazetted since notification of the PDP. As District Plans must be “prepared in accordance with”¹ and “give effect to”² a National Policy Statement, the implications of the relevant National Policy Statements on the PDP must be considered.
14. The National Policy Statement for Indigenous Biodiversity (NPS-IB) took effect on 4 August 2023, after the PDP was notified for public submissions (27 July 2022). The objective of the NPS-IB is to maintain indigenous biodiversity so there is at least no overall loss in indigenous biodiversity. The objective is supported by 17 policies. These include Policy 1 and Policy 2 relating to the principles of the Treaty of Waitangi and the exercise of kaitiakitanga by tangata whenua in their rohe. Part 3 of the NPS-IB sets out what must be done to give effect to the objective and policies.
15. The National Policy Statement for Highly Productive Land (NPS-HPL) took effect on 17 October 2022, The NPS-HPL has a single objective: Highly productive land is protected for use in land-based primary production, both now and for future generations. The objective is supported by nine policies and a set of implementation requirements setting out what local authorities must do to give effect to the objective and policies of the NPS-HPL, including restrictions on the urban rezoning, rural lifestyle rezoning, and subdivision of highly productive land and requirements to protect highly productive land from inappropriate use and development.
16. Mandatory Directions 6.16 – 6.24 of the National Planning Standards require the inclusion of National Direction Instruments in accordance with the specified format and to be updated when the new National Direction Instrument is promulgated. I recommend that Part 1 National Instruments section be amended to reflect these new policy statements as per attachment 1.

4.1.2.2 National Policy Statements – Announced Future Changes

17. In October 2023 there was a change in government and several announcements have been made regarding work being done to amend or replace various National Policy Statements (summarised in **Table 1** below).

¹ Section 74(1)(ea) of the Resource Management Act 1991

² Section 75(3)(a) of the Resource Management Act 1991



The below are of general relevance to the submissions received on the Part 1 and General/ Miscellaneous topic.

National Statement	Policy	Summary of announced future changes	Indicative Timing
National Statement for Freshwater Management (NPS-FM)	Policy for (NPS-FM)	<ul style="list-style-type: none"> Changes to hierarchy of obligations in Te Mana o Te Wai provisions Amendments to NPS-FM, which will include a robust and full consultation process with all stakeholders including iwi and the public 	<p>End of 2024</p> <p>2024 - 2026</p>
National Statement on Indigenous Biodiversity (NPS-IB)	Policy on (NPS-IB)	<ul style="list-style-type: none"> Amendments to the NPS-IB Work to stop/cease implementation of new Significant Natural Areas 	2025 - 2026
National Statement for Highly Productive Land (NPS-HPL)	Policy for Highly Productive Land (NPS-HPL)	<ul style="list-style-type: none"> Amendments to the NPS-HPL in light of needing to enable housing growth and remove consenting barriers. Possible amendments to the definition of 'Highly Productive Land' to enable more flexibility 	<p>vvvvvvvvvvvvvvvvvv) -</p> <p>2025</p>

4.2 Council's Response to Current Statutory Context

18. The evaluation of submissions and recommendations in this report are based on the current statutory context (that is, giving effect to the current National Policy Statements). I note that the proposed amendments and replacement National Policy Statements do not have legal effect until they are adopted by Government and formally gazetted.
19. Sections 55(2A) to (2D) of the RMA sets out the process for changing District Plans to give effect to National Policy Statements. A council must amend its District Plan to include specific objectives and policies or to give effect to specific objectives and policies in the National Policy Statement so directs. Where a direction is made under Section 55(2), Councils must directly insert any objectives and policies without using the Schedule 1 process, and must publicly notify the changes within five working days of making them. Any further changes required must be done through the RMA schedule 1 process (such as changing rules to give effect to a National Policy Statement).



20. Where there is no direction in the National Policy Statement under Section 55(2), the Council must amend its District Plan to give effect to the National Policy Statement using the RMA schedule 1 process. The amendments must be made as soon as practicable, unless the National Policy Statement specifies a timeframe. For example, changes can be made by way of a Council recommendation and decision in response to submissions, if the submissions provide sufficient 'scope' to incorporate changes to give effect to the National Policy Statements.
21. We have been mindful of this when making our recommendations and believe the changes we have recommended are within scope of the powers prescribed under Section 55 of the RMA or within the scope of relief sought in submissions.

4.2.1 Iwi Management Plans – Update

22. Ngā Tikanga mo te Taiao o Ngāti Hine' the Ngāti Hine Environmental Management Plan was in draft form at the time of the notification of the PDP. This was updated, finalised and lodged with the Council in 2022, after notification of the PDP in July 2022.
23. The Ahipara Takiwā Environmental Management Plan was in draft form at the time of the notification of the PDP. This was updated, finalised and lodged with Council in 2023, after notification of the PDP in July 2022.
24. Iwi Management Plans are proposed to be referenced within the Tangata Whenua Section of Part 1 which are addressed in a separate section 42A Report. I have considered the outcomes sought of the Ngā Tikanga mo te Taiao o Ngāti Hine' the Ngāti Hine Environmental Management Plan and Ahipara Takiwā Environmental Management Plan when evaluating submissions.

4.3 Section 32AA evaluation

25. This report used 'key issues' to group, consider and provide reasons for the recommended decisions on similar matters raised in submissions. Where applicable, the recommended decisions have been evaluated using Section 32AA of the RMA.
26. The s32AA further evaluation for each key issue considers:
 - Whether the amended objectives are the best way to achieve the purpose of the RMA.
 - The reasonably practicable options for achieving those objectives.
 - The environmental, social, economic and cultural benefits and costs of the amended provisions.
 - The efficiency and effectiveness of the provisions for achieving the objectives.



- The risk of acting or not acting where there is uncertain or insufficient information about the provisions.

27. The s32AA further evaluation contains a level of detail that corresponds to the scale and significance of the anticipated effects of the changes that have been made. Recommendations on editorial, minor and consequential changes that improve the effectiveness of provisions without changing the policy approach are not re-evaluated.

4.4 Procedural matters

28. Due to the clarity of submissions, no correspondence or pre-hearing meetings with submitters have been completed.

4.4.1 Withdrawn Submission Points

29. The submitter Trent Simpkin (S283) requested that submission point 283.021 be withdrawn. The reason being the relief sought was not intended to relate to the airport zone.

30. Further submissions on this submission point are Vision Kerikeri 3 (FS570), Vision Kerikeri 2 (FS569) and Kapiro Conservation Trust 2 (FS566). These submitters were contacted and informed of the withdrawal, they confirmed that they had no objection to the withdrawn of the following points FS570.835, FS569.871 and FS566.849.

4.4.2 Late Submission

31. PS Yates Family Trust (FS384) further submission was received 29th September 2023, 3 and a half weeks after the closing time/date for further submissions (5.00pm, Monday 4th September).

32. The Hearing Panel (on behalf of Council) has the ability to extend a time limit for Schedule 1 processes under Section 37 and 37A of the RMA, taking into account:

(a) the interests of any person who, in its opinion, may be directly affected by the extension or waiver; and

(b) the interests of the community in achieving adequate assessment of the effects of a proposal, policy statement, or plan; and

(c) its duty under section 21 to avoid unreasonable delay.

33. Taking into account the matters set out in Section 37A of the RMA, it is recommended that the Hearing panel accept PS Yates Family Trust (FS384) late further submission as a further submission, allowing the matters raised to be addressed through the hearing process because:

- The further submitter raises matters that are within the scope of the original submission..



- There is no prejudice to any person directly affected by the Hearings Panel accepting the late further submissions.

4.4.3 Further submissions rejected

34. After the notification of the summary of decisions requested, and call for further submissions, Council became aware of some error and omissions. An addendum was prepared to correct those matters. Though this process Council received some further submissions that were not in relation to points notified in the Addendum.
35. The following list of further submissions are rejected as they are not related to the Summary of Submissions Addendum:
 - Robert John McKibbin
 - Peter Selwyn Yerkovich

4.4.4 Hearings timetable

36. It is to be noted that there has been a revision to the hearings timetable, with submissions on 'Engineering standards' now being considered at Hearing 8.

5. Consideration of submissions received

5.1 Overview of submissions received

37. A total of 89 original submissions and 206 further submissions were received on the Part 1 and General/Miscellaneous topic.
38. The main submissions on the Part 1 and General/Miscellaneous came from:
 - Local community and conservation groups
 - Government agencies
 - Iwi and hapu
 - Local property owner and businesses.
39. Given the number, nature and extent of submissions received, this Section 42A Report addressed the key themes and issues raised generally, as opposed to making specific recommendations on each submission point. The Report has been structured based on chapter, then section as they appear in the PDP.
40. The submissions will be assessed in the order set out below:
 - Key Theme 1: Whole of plan submissions
 - Key Theme 2: Introduction



- Key Theme 3: How the plan works
 - Key theme 4: National Direction Instruments
 - Key Theme 5: Plan wide submissions
 - Key Theme 6: New chapter submissions
 - Key Theme 7: Submissions seeking general clarifications
 - Key Theme 8: Submissions that sit outside the scope of the District Plan Review
41. Section 5.2 constitutes the main body of the report and considers and provides recommendations on the decisions requested in submissions. Due to the large number of submissions received and the repetition of issues, as noted above, it is not efficient to respond to each individual submission point raised in the submissions. Instead, this part of the report groups similar submission points together under key issues. This thematic response assists in providing a concise response to, and recommended decision on, submission points.

5.2 Officer Recommendations

42. A copy of the recommended plan provisions for the Part 1, and General/ Miscellaneous is provided in **Appendix 1 – Recommended provisions** to this report.
43. A full list of submissions and further submissions on the Part 1, and General/ Miscellaneous is contained in **Appendix 2 – Recommended Decisions on Submissions** to this report.
44. Additional information can also be obtained from the Summary of Submissions (by Chapter or by Submitter) [Submissions database Far North District Council \(fndc.govt.nz\)](http://fndc.govt.nz) the associated Section 32 report on this chapter [section-32-overview.pdf \(fndc.govt.nz\)](http://fndc.govt.nz) the overlays and maps on the ePlan [[Map - Far North Proposed District Plan \(isoplan.co.nz\)](http://isoplan.co.nz)].

5.2.1 Key Theme 1: Whole of plan submissions

Overview

Provision(s)	Officer Recommendation(s)
PDP in its entirety	Reject the submissions which generally oppose, the PDP in its entirety. Reject those submissions to amend the PDP in its entirety. Accept in part those submissions which seek to retain the PDP as notified.

Analysis of Submissions on Key Theme 1



Submissions

45. Simon Coe (S31.001) and Ian Ray (Joe) Carr (S397.001) both support the PDP and request for it to be retained as notified. Transpower New Zealand Ltd (S454.022) also supports Part 1 of the PDP and request that it be retained as notified.
46. Mauri – Crown-Tane (S539.001) opposes the PDP and seeks that the PDP and all its contents be deleted. Robyn Josephine Baker (S69.005) seeks to delete the PDP and replace it with a plan that has been drafted in true consultation with the citizens and rate payers of the area. Alec Brian Cox (S170.001) also opposes the PDP content and seeks that the PDP is reviewed and redesigned so that all rules which contain limits provide for the activity to be prohibited if the final limit is breached.
47. Groundswell NZ (S465.001) opposed by four further submissions (FS 25.009, FS349.006, FS332.217, and FS325.007) oppose the general process of the district plan and seek to pause the district plan process until the failings of the RMA are addressed and there is clarity around the National Policy Statement Indigenous Biodiversity and the RMA replacement.
48. Carbon Neutral NZ Trust (S529.112 and 113) and Vision Kerikeri (527.002) seek that the PDP is amended to implement and strengthen the key principles and obligations of the RMA. Vision Kerikeri states that they are concerned that positive environmental objectives should not be balanced against economic development.
49. Wai Claimant groups (S60.001) seek that the PDP be amended to exclude Hokianga.
50. Strand Homes Ltd/Okahu Developments Ltd (S77.010), Martin John Yuretich (S40.011), Joel Vieviorka (S41.011), Julianne Sally Bainbridge (S163.016), Rua Hatu Trust (S377.011), Kerry-Anne Smith (S410.011), Helmut Friedrich Paul Letz and Angelika Eveline Letz (S470.011), Shanon Garton (S161.010), Elbury Holdings (S519.012, S485.012, S541.011, S485.048, S519.047), Sean Jozef Vercammen (S395.011), Michael Foy (S472.048), John Joseph and Jacqueline Elizabeth Matthews (S439.011), Rodney S Gates and Cherie R Gates (S569.011), Trevor John Ashford (S146.011), Roger Myles Smith (S411.011), Te Hiku Community Board (S257.032), Kelvin Richard Horsford (S544.011), and LJ King Ltd (S464.011, S547.011, S543.011) generally support the plan in part and state the following:

“Amend the PDP to reflect the submission as follows: Stop telling your community what the government has said they have to do, and start fighting for your community. Otherwise, you are just puppets of the government, and not our representatives.... Facilitate don’t force. Maybe then your community might actually start to value and respect you”



Analysis

51. While I acknowledge the points being raised, when carrying out its functions and duties under the RMA, including the development of district plans, Council is obliged to meet any and all requirements set out in it. I recommend that the submissions seeking deletion or amendment of the plan as a whole are rejected, for the following key reasons:
- a) When exercising its functions and powers in managing the use, development, and protection of natural and physical resources, the RMA requires that Council:
- Promotes the sustainable management of people and resources (s5)
 - Recognises and provides for matters of national importance (s6), including:
 - Protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna
 - Protection of historic heritage from inappropriate subdivision, use and development.
 - Has particular regard to other matters (s7)
 - Takes into account the principles of the Treaty of Waitangi (s8).
 - 'Gives effect to' (i.e. implements) the direction in National Policy Statements including the NPS-IB and NZCPS, and regional direction in the RPS (Note: a strong directive that creates a firm obligation on the Council).
52. Council has undertaken an appropriate process of engagement with tangata whenua and its community during the preparation of the PDP (summarised in S6 of the section-32-overview report) to ensure that the PDP meets the needs of the community (while also fulfilling its obligations to implement national direction).
53. The district plan review process began in 2015, since that time multiple technical reports, issues and options paper have been prepared, a draft plan which were open for consultation. The section 32A reports supporting the PDP, detail how the provisions achieve the purpose of the RMA.
54. Council must at all times have a District Plan and is legislatively bound to review the District Plan every 10 years under the RMA.

Recommendation

55. I recommend, for the reasons given above, that the Hearings Panel make no changes to the PDP as the result of the above-mentioned submission points.



56. I recommended that the submissions and further submissions be accepted, accepted in part, or rejected as indicated in Appendix 2.

Section 32AA evaluation

57. No change is recommended, on this basis, no evaluation under Section 32AA is required

5.2.2 Key Theme 2: Part 1 Introduction

Overview

Provision(s)	Officer Recommendation(s)
Contents section	Amend the contents to delete contaminated land.
Purpose section	Retain as notified.
Description of the District section	Minor amendments the significant resource management issues.

Analysis of Submissions on Key Theme 2 – Introduction

Matters raised in submissions

58. 16 original submission points from 10 different submitters (S368, S486, S390, S498, S573, S349, S559, S421, S477, S389) were received on the Introduction Chapter of the PDP.

Contents

Submissions

59. FNDC (S368.046) support the contents section in the Introduction Chapter in part and request the deletion of the reference to 'contaminated land' in the contents chapter of the PDP.

Analysis

60. I note that submissions seek the inclusion of a contaminated land chapter and I have addressed the inclusion of a contaminated land chapter in the new chapters topic of this report. I recommend this submission is accepted, and contaminated land deleted from the contents for the reasons detailed in 4.2.6 - New chapters topic.

Purpose

Submissions

61. Te Rūnanga o Whaingaroa (S486.051), Te Runanga o Ngai Takoto Trust (S390.038) and Te Rūnanga Ā Iwi O Ngāpuhi (S498.039) all oppose the purpose section in the Introduction Chapter and request the removal of "He Whenua Rangatira" and Te Runanga o Ngai Takoto Trust (S390.038) and Te Rūnanga Ā Iwi O Ngāpuhi (S498.039) further request to remove reference to "FN2100."



Analysis

62. "FN 2100 He Whenua Rangatira" is the name of the Far North District Councils long term strategy, as such it is appropriate that is referenced in the Purpose Section by its full name. I recommend these submissions are rejected.

Description of the District

Submissions

63. Te Kawariki me Te Wānanga o Te Rangi Aniwanīwa (S573.006) request to retain paragraph 4 of the Description of the District section in the Introduction Chapter as notified.
64. Te Rūnanga o Ngāti Rēhia (S559.054) support the Significant Resource Management Issues listed in the Description of the District section and request they be retained as notified. Te Rūnanga o Ngāti Rēhia (S559.053) also request a new Significant Resource Management Issue for water resilience and reliable water supply.
65. Neil Construction Limited (S349.002) opposes the Significant Resource Management Issues listed in the Description of the District section and requests to either delete them or amend them to include further provision for rural residential capacity.
66. Te Rūnanga o Whaingaroa (S486.053, S486.054) oppose Significant Resource Management Issue 1 and request to replace the word "Partnerships" with the word "Relationships" and further request the amendment to identify issues Council has, forming relationships with iwi and hapū.
67. Federated Farmers (S421.002) oppose Significant Resource Management Issue 2 and request to amend it as follows:

"The Rural Environment contains a number of ~~There are~~ competing demands for a range of land use activities ~~in the Rural Environment~~. A The previous permissive planning framework has resulted ~~led, in some areas, to~~ in incompatible land uses, land fragmentation and significant adverse effects on rural character, amenity and indigenous biodiversity. ~~In some cases,~~ highly productive land (which includes including versatile soils) have been used in such a way that compromises the future viability of primary production activities, such as horticulture and agriculture has been compromised. ~~and~~ These uses have also inappropriately used existing infrastructure and services. The current Rural Production Zone has applied a single set of provisions to the majority of the District, ~~which~~ This approach does ~~has~~ not addressed the specific issues faced ~~by~~ in the different rural areas and their communities. It is ~~also~~ important that the District Plan clearly reflects that rural settlements differ in their ability to access the infrastructure and services available in urban centres."



68. Te Waka Pupuri Putea Trust (S477.004, S477.005, S477.006, S477.007) request the amendment of Significant Resource Management Issues 3, 4, 6 and 9 to be forward-thinking regarding climate-related issues as the geography of their rohe makes them more susceptible to those issues and their potentially dire consequences.
69. Submitter Taituha, Tane & Apiata (S389.017) seeks to amend the PDP to include key values to underpin the plan, including: Kotahitanga, Mana and Manaakitanga and also the roles and responsibilities of Council and Tangata whenua as dynamics within the realms of Papatūānuku and Ranginui.

Analysis

70. In my opinion the suggested rewording of the rural sustainability significant resource management issue by S421.002 helps to clarify the issue. I recommend this submission point is accepted in part and the Significant resource management issue amended.
71. In regard to Te Rūnanga o Ngāti Rēhia request for a new significant resource management issue for water resilience and reliable water supply, the significant resource management issues were drafted in the early stages of the plan review process and have been taken along on the journey of the plan development. Issue 6 affordable infrastructure discusses the implications of servicing the district which I believe addresses the water resilience and reliable water supply issues.
72. With respect to the submission from Neil Construction Limited to delete the significant resource management issues or include provision for rural residential capacity. Neil Construction's interest is in the land that they own, in that they seek the land to be utilised more efficiently for rural residential use, adding to housing in Kerikeri. The significant resource management issues (SRMI) were developed as a result of early engagement with the community in 2017. These SRMI, some of which were carried over from the Operative District Plan, formed an important basis for the District plan review process. The 10 SRMI are considered the significant issues for the District. While the RMA does not require a district plan to identify SRMI, they assist in giving relevance to the objectives, policies, and methods. The urban sustainability and affordable infrastructure SRMI emphasise the importance for the Far North District of the right activities happening in the right places in regard to housing supply.
73. The submission points from Te Waka Pupuri Putea Trust seek the expansion of the significant resource management issues to be more forward thinking of climate change issues related to their rohe. I consider that at a high level SRMI, Issue 3 – Hazard resilience and climate change addresses this.
74. Te Rūnanga o Whaingaroa have sought to amend significant resource management Issue 1 by replacing the word 'partnership' with 'relationship',



this matter will be comprehensively addressed in the Tangata Whenua Section 42A report and I recommend consequential amendments subject to determinations of this topic.

Recommendation

75. I recommend the submission seeking the deletion of contaminated land from the Contents chapter is accepted.
76. I recommend the submission points requesting the removal of "He Whenua Rangatira" from the purpose section of the introduction are rejected, and the Introduction section retained as notified.
77. I recommend those submitters which seek the significant resource management issues to be retained are accept in part. The submissions to delete the significant resource management issues are rejected. The submissions that seek amendments to the significant resource management issues shall be rejected except for the submission from Northland Federated Farmers, which I recommend is accepted in part.
78. The Rural Sustainability, Significant Resource Management Issue is amended as follows:

***Issue 2 – Rural Sustainability** "The Rural Environment contains a number of ~~There are~~ competing demands for a range of land use activities in the Rural Environment. A permissive planning framework has led, in some areas, to incompatible land uses, land fragmentation and significant adverse effects on rural character, amenity and indigenous biodiversity. ~~In some cases,~~ highly productive land (which includes including versatile soils) have been used in such a way that compromises the future viability of primary production activities, such as horticulture and agriculture has been compromised. and These uses have also inappropriately used existing infrastructure and services. The current Rural Production Zone has applied a single set of provisions to the majority of the District, which This approach does has not addressed the specific issues faced by in the different rural areas and their communities. It is also important that the District Plan reflects that rural settlements differ in their ability to access the infrastructure and services available in urban centres."*

79. I recommended that the submissions and further submissions be accepted, accepted in part, or rejected as indicated in Appendix 2.

Section 32AA evaluation

80. The recommended amendments primarily clarify the intent of the provisions. On this basis, no separate evaluation for these recommended amendments under Section 32AA has been undertaken, rather the relevant s32AA consideration have been taken into account when carrying out the analysis above.

5.2.3 Key Theme 3: How the Plan Works



Overview

Provision(s)	Officer Recommendation(s)
Statutory Context	Amendments in relation to iwi authorities

Analysis of Submissions on Key Theme 3

Statutory Context

Submissions

81. Haititaimarangai Marae Kaitiaki Trust (S394.001) opposes the Statutory Context section in the How the Plan Works Chapter and requests that the second sentence of the third paragraph is amended as follows:

"Far North District Council along with its recognised eleven iwi authorities and some ~~these~~ hapū groups it has memorandums of understanding with have worked in partnership to develop the Far North District Plan in accordance with the principles of the Treaty of Waitangi."

Analysis

82. Haititaimarangai Marae Kaitiaki Trust submission point on the statutory context section seeks to clarify that those iwi authorities recognised by Council do not represent all hapu. I accept that as notified the sentence is unclear, if read literally it indicates that FNDC have ownership of the iwi authorities, however, I do not support the specific relief sought as Council is unable to "recognise" the authority of an iwi authority which is defined in the RMA as:

***iwi authority** means the authority which represents an iwi and which is recognised by that iwi as having authority to do so*

83. Furthermore, I do not support the inclusion of the word "some" to hapu, as the notified sentence accurately reflects the process undertaken to draft the PDP, which included working with hapu groups with MOU. I recommend amendments to improve clarity of the sentence.

General approach

Submissions

84. Royal Forest & Bird (S511.018) and Kapiro Conservation Trust (S442.038) both support the Format of Chapters in Part 2 and Part 3 Section under General Approach in the How the Plan Works Chapter in part and request to amend the last sentence of the reference "Zones" under the District Plan Framework Section under General Approach in the How the Plan Works Chapter as follows:

"Area specific zone matters chapters ~~do not~~ contain rules and standards that apply generally ~~across the district~~ specifically to the area or zone. There are additional rules and standards which apply generally across the district in the District Wide Matters chapters. This



may result in more than one rule applying to an activity, in which case the more stringent will apply.

And Add Where there is a conflict between the provisions in an area specific matters chapter and a provision for an overlay in a district wide matters chapter that cannot be resolved by carefully considering the wording of the provisions, it is the district wide overlay provision which prevails."

85. Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425.002), Foodstuffs (S363.002), Ngā Tai Ora - Public Health Northland (S516.008) Top Energy Limited (S483.194) and Paihia Properties (S344.003) all request to amend all relevant overlay chapters as necessary to insert rules for "Activities not otherwise listed in this chapter" consistent with the zone chapters, and the following deletion of paragraph 3 from the Applications Subject to Multiple Provisions Section under General Approach in the How the Plan Works Chapter as follows:

~~...Some of the Overlay chapters only include rules for certain types of activities (e.g. natural character, natural features and landscapes or coastal environment). If your proposed activity is within one of these overlays, but there are no overlay rules that are applicable to your activity, then your activity can be treated as a permitted activity under the Overlay Chapter unless stated otherwise. 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).~~

86. Additionally Top Energy Limited (S483.025), Foodstuffs (363.003) and Nga Tāi Ora Public Health Northland (S516.010) seeks the consistency in implementation advice notes across the PDP. Further Foodstuffs and Nga Tāi Ora seek that the How the Plan works section should list notes which apply across multiple chapters.
87. Bentzen Farm Limited (S167.001), Setar Thirty Six Limited (S168.001), Matauri Trustee Limited (S243.001), P S Yates Family Trust (S333.001), Wendover Two Limited (S222.001) and The Shooting Box Limited (S187.001) all support the Applications Subject to Multiple Provisions Section under General Approach in the How the Plan Works Chapter in part and request a new clause specifying that if an overlay is shown on the Planning Maps, the overlay provisions only apply to the portion of the property covered by the overlay.
88. Twin Coast Cycle Trail (S425.001) also request an amendment to ensure that there is clear integration between chapters, as well as overlays in the Relationships Between Spatial Layers Section in the How the Plan Works Chapter. Te Aupouri Commercial Development Ltd (339.001) goes further to seek amendments to provide clear direction that the Treaty Settlement Land Overlay and provisions prevail over the underlying zone provisions, where an activity or standard is provided. Top Energy Limited (S483.023, 186) also requests clarity as to how the chapters within the plan interact.



89. Top Energy (S483.185) seeks the insertion of direction on spilt zoning.

Analysis

90. I agree that the amendments to the last sentence of the reference “Zones” under the District Plan Framework Section of Part 2 and 3 add clarity to how the plan works. However, the addition of the second sentence of proposed wording is not correct. The Treaty Settlement Overlay is an enabling overlay and, where there is a conflict between the activity in the zone and the Treaty Settlement Overlay, the less restrictive rule applies. In my opinion, it is not necessary to include detail on the conflict management of district wide overlay and zones.
91. I do not support the multiple submitters that seek deletion of paragraph 3 of the Applications Subject to Multiple Provisions section. As the overlay and zone chapters are managed in different ways. For this reason, the management is best left to apply on a case-by-case basis rather than a universal approach.
92. I acknowledge that wording need to be added to clarify how the Treaty Settlement Overlay operates in the plan, but the drafting of this is deferred to the Treaty Settlement Overlay Hearing, with consequential amendments after that hearing.
93. Additionally, I recommend direction is needed as to how proposals subject to two or more permitted provisions are dealt with. As is intended that the proposal needs to meet the standards of all the provisions.
94. In response to the need for direction on overlay provisions, I note that it is already provided in the Applications subject to Multiple Provisions section of the General Approach. Where it states:
- “Where a rule for an overlay, zone or precinct controls an activity by reference to a proportion or percentage of the site, the control will be limited to that part of the site to which the overlay or zone applies.”*
95. As there are different management methods in the PDP the General Approach section, Direction on the Management of the Relationships between Spatial Layers is addressed in the Application Subject to Multiple Provisions section, and within the overlay and zones chapter. In my opinion, duplication is not necessary, and I recommend that these submission points are rejected. This in turn addresses the submission points on consistency in implementation advice notes across the plan which I recommend are rejected as the management of zones and the differing overlays varies.
96. In my opinion, no specific statement or rule is necessary to address split zoning, as notified the PDP mapping eliminated spilt zoning. I note that this may need to be reviewed in response to any zoning decisions should split zoning result. I recommend that this submission be rejected.



Cross boundary matters

Submissions

97. NRC (S359.003) supports the Cross Boundary Matters Section in the How the Plan Works Chapter in part and requests that the PDP is amended to align the more generic district plan rules with those adjoining councils. Te Runanga o Ngai Takoto Trust (S390.004) seeks that provisions are inserted in relation to how Māori land parcels are treated across Council boundaries.

Analysis

98. The submission from Northland Regional Council is open ended and suggests that there may be cross boundary issues with earthworks, genetically modified organisms and vegetation clearance identified as possible areas. However, the submitter suggested no detail around specific rules. Direction is given in the How the Plan Works section as to how these issues are addressed in the PDP. Northland Regional Council may seek to provide further information at the hearing in regard to specific rules. I recommend these submission points are rejected.
99. It is considered that direction on Māori land parcels is not necessary. There are less than 10 Māori land blocks that straddle both the Far North and Whangarei or Kaipara districts. The cross boundary issues section already contains guidance and Māori land will also be treated in this way. For these reasons I recommend that this submission be rejected.

Other

Submissions

100. Kāinga Ora (S561.003) seeks to include a direction in the How The Plan Works section that all restricted discretionary activities shall be excluded from limited or public notification.
101. Alec Brian Cox (S170.005) also seeks that those rules which are zone dependent within the district-wide sections are transferred to the relevant zones. Mr Cox also (S170.006) seeks to delete zoning from areas defined by existing resource consents and rezone according to the approved activity.

Analysis

102. I do not support the relief sought by Kāinga Ora. While there are some PDP's throughout the country that exclude residential activities from public notification, I consider a step too far to also exclude them from limited notification. Kāinga Ora's interest is in relation to housing, with their reasoning being that any effects generated by housing development are well understood and that housing developments can be assessed against the residential outcomes within the district plan. Due the diverse range of character and amenity within and between the numerous townships in the Far North District, all effects may not be well understood. Secondly there are activities other than housing in the plan that are restricted discretionary



activities. More evidence and clarity around any implications would need to be provided in order to for me to support the relief sought, I recommend this submission point is rejected.

103. The multiple submissions points from Alec Brian Cox are not supported for the following reasons

- The PDP has been drafted in accordance with the National Planning Standards which determines chapter topics and the location of rules.
- Zoning based on approved activities would create inappropriate spot zoning throughout the district and in turn create plan inconsistencies and complications.
- The plan development included a rationalisation of zones around existing uses that may have been approved by way of consent out of zone.

Recommendation

104. The submission from Haititaimarangai Marae Kaitiaki Trust has been accepted in part and the statutory context section amended as follows:

".....Far North District Council along with ~~its~~ the eleven authorities for the purposes of the Resource Management Act 1991(RMA) and those groups it has memorandums of understanding with have worked in partnership to develop the Far North District Plan. ~~in accordance with the principles of the Treaty of Waitangi.~~"

105. The submissions seeking changes to Part 3 - Area specific overlays and 'Applications Subject to Multiple Provisions' are accepted in part with the following amendments to the plan:

Part 3 – Area Specific Matters

"... .. Area specific ~~zone~~ matters ~~chapters do not~~ contain rules and standards that apply ~~generally across the district~~ specifically to the area or zone. There are additional rules and standards which may apply generally across the district in the District Wide Matters chapters.

Applications subject to multiple provisions

The overall activity status of a proposal will be determined on the basis of all rules which apply to the proposal. This includes rules in the District-Wide Matters and Area-Specific Matters. When a proposal involves several activities that are subject to multiple rules with different activity statuses, and/or involves an activity/activities across multiple zones, precincts, areas, overlays or features, and it is appropriate to "bundle" the activities, the



proposal will be assessed on the basis of the most restrictive activity status (unless otherwise stated). If a proposal is subject to one or more provisions, that have a permitted activity status the proposal will need to comply with all the provisions and their standards.

- 106. The submission point 339.001 which seeks direction on how the Treaty Settlement Overlay works is deferred to the Treaty Settlement Overlay hearing.
- 107. The submission points from Northland Regional Council and Te Runanga o Ngai Takoto Trust around cross boundary issues are rejected.
- 108. The 'other' submissions from Kāinga Ora submission with respect to the addition of notification requirements, and Alec Brian Cox submissions are rejected.
- 109. I recommend that the submissions and further submissions be accepted, accepted in part, or rejected as indicated in Appendix 2.

Section 32AA evaluation

- 110. The recommended amendments primarily clarify the intent of the provisions. On this basis, no separate evaluation for these recommended amendments under Section 32AA has been undertaken, rather the relevant s32AA considerations have been taken into account when carrying out the analysis above.

5.2.4 Key Theme 4: National Direction Instruments

Overview

Provision(s)	Officer Recommendation(s)
National Policy Statements and New Zealand Coastal Policy Statement	Amend the table to add National Policy Statement for Highly productive land and National Policy Statement for Indigenous Biodiversity

Analysis of Submissions on Key Theme 4

Submissions

- 111. Te Waka Pupuri Putea Trust (S477.001) seeks that the PDP is amended to have regard to the pending reforms and statutory documents as required.

Analysis

- 112. I recommend that submission point seeking to amend the PDP to reflect statutory reforms and documents be accepted in part. The National policy statements and New Zealand Coastal Policy Statement chapter be amended to reflect the introduction of the NPS-IB and the NPS-HPL. It is



to be noted that the status of these statements may be subject to change thought out the hearings process.

National Policy Statement	Details of the Policy Statement and/or Plan review or a relevant change to give effect (fully or partially) to each National Policy Statement
National Policy Statement for Freshwater Management 2020	The national policy statement has been reviewed in September 2020.
National Policy Statement on Urban Development 2020	The policy statement has been reviewed in August 2020.
National Policy Statement on Renewable Electricity Generation 2011	The policy statement has been reviewed in August 2020.
New Zealand Coastal Policy Statement 2010	The policy statement has been reviewed in August 2020.
National Policy Statement on Electricity Transmission 2008	The policy statement has been reviewed in August 2020.
<u>National Policy Statement for Indigenous Biodiversity 2023</u>	<u>The Policy statement has not been reviewed</u>
<u>National Policy Statement on Highly Productive Land 2023</u>	<u>The Policy statement has not been reviewed</u>

Recommendation

113. I recommended that the submission be accepted in part as indicated in Appendix 2.

Section 32AA evaluation

114. The recommended amendments are largely for clarification only. On this basis, no evaluation for these recommended amendments under Section 32AA is required.

5.2.5 Key Theme 5: Plan wide submissions

Overview

Provision(s)	Officer Recommendation(s)
Plan wide provisions	Submissions are rejected and where appropriate addressed by topic authors

Analysis of Submissions on Key Theme 5

Objectives and policies

Submissions

115. Lynley Newport (S120.001) with further submission (support from FS172.204, FS196.1, FS196.76 and opposition from FS332.223) requests amendments to objectives and policies that start with the word "avoid" to



see if the negative restrictive language can be replaced with more enabling language.

116. John Andrew Riddell (S431.168) with further submission support (FS332.168 and FS 404.058) seeks all objectives and policies where there is a reference to protection for current and future generations, add "and intrinsic and natural values."

Analysis

117. There are 34 policies in the PDP that start with the word avoid. The drafting style throughout the PDP was to be clear and directive to achieve the outcomes sought. The word avoid is used where there is strong higher order policy direction to avoid that activity and/or effects. In order to 'give effect' to that policy direction in accordance with s75(3) of the RMA. I recommend this submission point be rejected.
118. The concept of intrinsic value reflects the perspective that nature has value, independent of human uses. There are 3 objectives in the PDP that could be amended by this submission. I recommend that this submission point is deferred and addressed in by relevant s42A topics (coastal environment, natural character, indigenous biodiversity and rural production).

National Policy Statements

Submissions

119. Carbon Neutral NZ Trust (S529.174), Kapiro Conservation Trust (S442.011) and Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527.035) all request to amend the entire PDP to give full effect to the NPS-FM.
120. Kapiro Conservation Trust (S442.012, S429.009, S429.004) seek the fundamental concept of Te Mana o te Wai to be applied to all freshwater issues that may be affected by development throughout the PDP. Kapiro Conservation Trust (S442.013, S429.009, S429.004) in response to the NPS -FM clause 3.5 (4) seek PDP policies and rules to promote positive effects and avoid, remedy or mitigate adverse effects (including cumulative effects) of urban development on the health and wellbeing of water bodies and freshwater ecosystems. In addition requirements to use water sensitive and low impact designs for stormwater and wastewater, avoidance of freshwater pollutions, and requirements when subdivision or development takes place to protect of waterways.
121. Kapiro Conservation Trust (S442.014, S429.009, S429.004) further seek to amend the PDP to avoid the loss of wetlands and to protect their value.
122. Te Waka Pupuri Putea Trust (S477.001) seeks that the PDP is amended to have regard to the pending reforms and statutory documents as required.



123. NRC (S359.004) requests that the PDP be amended to have regard to the NPS-HPL and the NPS-IB.

Analysis

124. The NPS-FM in particular the policy direction of Te Mana o te Wai has been considered and given effect to, to the extent that meets the functions of a Territorial Authority set out in s31 of the RMA in drafting the PDP. While the regional council is responsible for the waterbodies themselves the district plan manages their margins and the activities that can occur in these areas. The PDP includes provisions for setbacks from lakes, river and wetlands and their margins, I note that these provisions will be addressed in separate section 42A reports.
125. As the PDP was notified 27 July 2022. It was prepared prior to the publication of the NPS-HPL and the NPS-IB. Given this timing a full evaluation of the PDP in relation to these documents under s32 RMA was not undertaken as part of the preparation of the PDP. All relevant chapters will need to be evaluated under section 32AA considering these National Policy Statements.
126. NPS-HPL requires that maps of Highly Productive Land be included in the plan, as soon as practicable, but no later than 6 months after maps of highly productive land in the relevant RPS become operative. When maps become available from NRC they will be added to the plan, under section 55(2) of the Act (which means the territorial authority must make the amendment without using a process in Schedule 1 of the Act). The Rural Environment hearing will further detail this.
127. The Ecosystems and indigenous biodiversity chapter will further discuss the implementation of this NPS and the mapping of Significant Natural Areas.
128. The submissions seeking amendments to the plan to have regard to the NPS -HPL and NPS -IB do not provide specific relief sought, as such I recommend that these submissions are deferred to be addressed by the Rural Environment and Ecosystems and indigenous biodiversity chapters.

Effects

Submissions

129. Carbon Neutral NZ Trust (S529.111) and Vision Kerikeri (S527.001) request to amend relevant parts of the PDP to specifically recognize the need to identify and address any cumulative effect and potential cumulative effects, and require sufficient information to assess potential long term effects of the proposed activity on the environment. Te Runanga A Iwi O Ngapuhi (S498.014) Te Runanga O Whaingaroa (S486.018) and Te Runanga o Ngai Takoto trust (S390.013) additionally seek that either the word 'adverse' is deleted or positive and cumulative effects added plan-wide.



130. NRC (359.022) Amend to include stronger reverse sensitivity provisions. Provisions to consider appropriate visual and physical screening and limitations on intensity of noise sensitive activities.
131. Further Ngā Tai Ora – Public Health Northland (S516.080) seeks to amend zone provisions to ensure adverse effects between zones and zone interface is managed by way of increased setbacks and /or noise and vibration considerations.

Analysis

132. Cumulative effects are addressed throughout the PDP, primarily through policies, but also through matters of restricted discretion.
133. As I understand it, the Carbon Neutral NZ trust and Vision Kerikeri's submission points are in relation to the transport network, noise and amenity and character. I note that transport policies TRANS-P3 and P8 include reference to cumulative effects "TRAN-P3 f. the adverse cumulative effects of land use and subdivision on the transport network, and TRA-P8 g. any cumulative effects arising from lawfully established activities in the surrounding environment." The noise chapter and zone chapters include matters of discretion with respect to cumulative effects which address amenity and character. Therefore, I do not recommend any further amendments to address cumulative effects.
134. The NRC submission regarding reverse sensitivity is very general, reasoning stating "recommend strengthening reverse sensitivity provisions especially where lifestyle/ rural residential development occurs within or adjoins Rural Production, mineral extraction, industrial zones, and significant infrastructure." Reverse sensitivity is addressed in both policy and matters of discretion throughout the PDP. NRC has not provided specific relief or amendments sought has not been provided, in the absence of specific's I recommend that this submission point be rejected.
135. Ngā Tai Ora seek to manage adverse effects between zones at the zone interface. However, the submission does not detail rule wording. For this reason, I recommend this submission point is rejected.

Supporting documents

Submissions

136. Kapiro Conservation Trust (S449.009, S446.001), Kapiro Residents Association (S427.008), Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S522.008, S524.001), Our Kerikeri Community Charitable Trust (S271.001, S338.008) and Carbon Neutral NZ Trust (S529.008, S529.066) all request to amend the PDP to incorporate a space holder through all relevant provisions in the plan to enable Council to continue to develop spatial plans, masterplans etc, and provide PDP mechanisms to implement such plans promptly, including through the review process should the plans be completed prior to the PDP being made operative.



Analysis

137. Under s73 of the RMA, a District Plan must be changed in the manner set out in Part 1 Schedule 1 which requires a plan change process to amend plan content. Any possible future plan changes can and will identify locations and approaches in the district plan that are appropriate for the outcomes and methods sought at the appropriate time. For these reasons, I recommend these submission points are rejected.

Plan terminology

Submissions

138. Good Journey Limited (S82.001) and The BOI watchdogs (S354.027) seek the plan be amended to simplify wording such that the provisions can be readily understood.
139. Nga Tai Ora – Public Health Northland (S516.012) seeks that plan wide the rules are amended as necessary to refer to defined terms used in activity-based rules, as there are discrepancies between the activities and terms within the zone and resource overlay chapters.

Analysis

140. The PDP has been prepared in accordance with the Planning Standards which seeks to create more uniformity in plan structure across New Zealand. As a statutory document, the PDP must use terminology and phrasing that reflects the RMA, higher order policy and caselaw which may not be easily understood by all plan users. The plans E plan format allows the user the ability to click on any defined word and the definition will pop up. This provides accessibility for the community. In addition, the policy direction of the PDP is written in a way that clearly identifies its outcomes, within the National Planning Standards templates. I therefore recommend that these submission points be rejected.
133. I understand work was done during the development of the plan to list all the activities and cross check back to the definitions. There may be some differences in the activity rules between the zones and overlays. I suggest this point is accepted in part at this stage and all the chapters plan wide undertake an exercise to check all rules include activities that have definitions and consistency in the terms and activities used where possible.

Open Space

Submissions

141. Kapiro Conservation Trust (S449.034), Kapiro Residents Association (S427.022), Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S522.021), Our Kerikeri Community Charitable Trust (S338.050) and Carbon Neutral NZ Trust (S529.033) all request to 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.

Analysis

142. This submission point has been comprehensively addressed in the Strategic Direction S42A report. Strategic direction policy has been proposed with respect to 'additional infrastructure' which in my opinion sufficiently provides for consideration of open spaces. Also, strategic direction promotes integrated transport, community wellbeing, and places that will meet the needs for present and future generations through the social and economic prosperity chapters.
143. The public access chapter contains, objectives, policies with rules found in the subdivision chapter. Outside the district plan The Far North Spaces and Places plan 2021-2030 provides more specific, district level guidance for spaces and places (facilities) planning.
144. While I support the intent of these submission points, no specific relief sought has been provided. Accordingly, I recommend these submission points are rejected and open spaces are addressed elsewhere in the PDP

Activity Status

Submissions

145. Carbon Neutral NZ Trust (S529.001), Kapiro Conservation Trust (S449.001), Kapiro Residents Association (S427.001), Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S522.001) and Our Kerikeri Community Charitable Trust (S338.001) all request for the PDP to be amended to provide clear criteria for assessing discretionary activities, and to recognise that undesirable activities that should be avoided should be classed as non-complying or prohibited activities, instead of discretionary activity.
146. These five submitters also included the points below which also are general points with no specific relief sought
 - reduce the ambiguities in policies, the word 'avoid' should be applied more often, and other phrasing should be clarified and strengthened substantially.
 - incorporate additional rules to protect the environment and amenity values, and to address climate change issues relevant to the types of activities.
147. Good Journey Limited (S82.002) oppose the PDP and request that it be amended so that limited use is made of fully discretionary activity status in the provisions, and greater use made of controlled and restricted discretionary activity status with clear limits on discretion and assessment criteria so as to enhance certainty for the development community.



148. Trent Simpkin (283.011) seeks that all rules are assessed for their necessity, or offer permitted pathways to reduce the number of resource consents.

Analysis

149. A discretionary activity must comply with any requirements, conditions and permissions specified in the RMA, regulations or relevant plan. I note some plans do include matters for consideration for discretionary activities, but it was decided at the time of drafting that the PDP would not include matters of consideration. Extensive consideration was given to the activity status of activities, where the effects of the activity are variable that it was not possible to prescribe standards to control the activity it was given a discretionary status. The PDP drafting stage include extensive consideration of those activities that should be non-complying in certain zones. Further, without reference to specific rules it is impractical to assess the impact of such a change. For these reasons I recommend that these plan wide submission points are rejected.
150. The activity status though out the PDP has been determined by the outcomes sought in relative objectives, the course of action required by policies and the potential effects of an activity type, where appropriate activity status could be restricted discretionary or controlled. In addition, the provisions have been assessed for appropriateness as required by S32 of the RMA. The submission point has not provided particular rule reference or relief sought, I recommend this submission point is rejected.
151. In response to Trent Simpkins submission, there is a large range of permitted activities enabled in each of the zones, based on the outcomes anticipated in those zones. I recommend this submission point is rejected.

Hunting areas

Submissions

152. 19 original submission points from one submitter (S436) were received relating to Hunting areas.
153. Northland Fish and Game Council (S436) have submitted on provisions GRZ-R3, GRZ-R9, RPROZ-R3, RLZ-R3, RRZ-R3, RSZ-R3, MUZ-R4, Rules, NOSZ-R16, OSZ-R15, SARZ-R16, CAR-R3, HZ-R3, KCZ-R3, KRT-R3, MPZ-R4, MIZ-R2, QR-R3 and request for the insertion of provisions that constrain housing and industrial developments near areas with recreational hunting values (S436.007, S4.36.011, S436.010, S436.012, S436.013, S436.014, S436.015, S436.009, S436.008, S436.016, S436.017, S436.018, S436.019, S436.020, S436.021, S436.022, S436.023, S436.024, S436.025).

Analysis



154. The submission points requesting the insertion of provisions that constrain housing and industrial developments near areas with recreational hunting values is inappropriate.
155. The Sport Fish and Game Bird Hunting areas described in the Northland Fish and Game submission are areas of lakes and wetlands scattered throughout the District. Northland Fish and Game have not provided maps of the area's values for their amenity characteristics which are important for culture and recreation.
156. The District Wide Natural Character chapter in the PDP addresses wetland, lakes, and river margins including bulk and location controls and rules managing earthworks and vegetation clearance, with the definition for wetland, lake and river margins containing different zone setbacks. I consider that the PDP rules minimise development in these areas. Noting that these rules may be subject to change through the hearing process. For the reasons above I recommend all the submission points are rejected.

Other

Submissions

157. NRC (S359.007) request amendments to land use provisions where they are an impediment to climate change mitigation (e.g. amenity-based rules on 'reflectivity', building height or similar that unduly limit opportunities for small to medium scale solar or wind generation). Northland Regional Council (S359.008) further request to amend the climate change provisions where required to have regard to the Te Taitokerau Climate Adaptation Strategy.
158. New Zealand Motor Caravan Association (S438.001) seek that freedom camping is either excluded from requiring resource consent or to make freedom camping permitted activity.
159. Te Kawariki me Te Wānanga o Te Rangi Aniwaniwa (S573.003) seeks that the plan be amended where possible to align with the outcomes sought in the Annual Plan.

Analysis

160. The submission points from Northland Regional Council are general with no specific provisions requested to be amended. Te Taitokerau Climate Adaptation Strategy has promoted a response from Council to work at a regional and local level to support community and iwi and hapu level adaptation. In my opinion, the PDP gives effect the RPS which includes direction around climate change, and no further change is necessary to give effect to Te Taitokerau Climate Adaptation Strategy.
161. Council promotes designated freedom camping sites in the district. Freedom camping has a variety of potential adverse effects. For example provision of parking, provision of three waters infrastructure, increased



noise and lighting effects or where there are high value natural aspects that are sensitive to land use. Therefore, considering the location and underlying zoning of a freedom camping site assessment thought the resource consent process may be necessary to manage those adverse effects. For these reasons I recommend these submission points are rejected. It is to be noted that FNDC has a camping in public places policy that seeks manage freedom camping in the district.

162. The Annual Plan has a shorter outlook than that of the district plan and sets out the Council budget and how activities and services will be financed for the upcoming year. The Annual Plan is directly linked to the Long Term Plan community outcomes, the Long Term Plan was taken into account when drafting the PDP. I recommend that this submission point is rejected.

Recommendation

163. I recommend that the submissions points seek to amend objectives and policies referencing 'avoid' are rejected and the submission point seeking the inclusion of "intrinsic and natural values" is deferred, to be addressed in the coastal environment, natural character, indigenous biodiversity or rural production chapters.
164. That all submission points regarding implementation of the NPS-FW be rejected. I would welcome submitters to provide further evidence and details of new provisions or amendments within Council's jurisdiction necessary to implement the NPS-FW.
165. The submission regarding implementation of the NPS -HPL and NPS- IB shall also be deferred and addressed by the Rural environment and indigenous biodiversity topics.
166. I recommend those submissions on supporting documents, be rejected and no changes are made to the PDP.
167. I recommend the submissions seeking amendments to plan wide terminology be rejected and those that seek plan wide consistency in activities and defined terms shall be accepted in part, with further work plan wide to be undertaken.
168. I recommend the submissions on open space are rejected and no changes are made to the PDP.
169. I recommend the submissions on activity status are rejected and no changes are made to the PDP.
170. I recommend the submission points on hunting areas are rejected and no changes are made to the PDP.
171. I recommend the submission points on 'other' are rejected and no changes are made to the PDP.



172. I recommended that the submissions and further submissions be accepted, accepted in part or rejected as indicated in Appendix 2.

Section 32AA evaluation

173. The recommended amendments primarily clarify the intent of the provisions. On this basis, no evaluation for these recommended amendments under Section 32AA is required.

5.2.6 Key Theme 6: New Chapters

Overview

Provision(s)	Officer Recommendation(s)
New chapters	No new chapters introduced into the PDP

Analysis of Submissions on Key Theme 6

Matters raised in submissions

Submissions

174. Kairos Connection Trust (S138.022, S138.023, S138.024) with further submission opposition from (FS 234) support the rules of the PDP in part and request 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.

175. Haigh Workman Limited (S215.052) with further submission support, support in part and opposition, request to insert a new chapter to the General District-Wide Matters addressing Stormwater Management (or Impermeable Surfaces generally) including overview, objectives, policies and rules in a similar way to the section on Earthworks management.

176. Oil Companies (S335.006) with further submission support (FS354.002) request a new Contaminated Land Chapter with the following provisions:

"CL-O1 Contaminated land is identified and managed so that it remains acceptable and safe for human health and its intended use.

CL-P1 Identify contaminated land prior to subdivision, change of use or development by:

- 1. Working with Northland Regional Council to maintain the Selected Land-use Register; and*
- 2. Requiring the investigation of contaminant risks for sites with a history of land use or activity that could have resulted in contamination of soil.*



CL-P2 Minimise the risk to human health from the subdivision, change of use or specified development of contaminated land by:

- 1. Requiring a good practice approach to site management of contaminated land;*
- 2. Ensuring the land is safe for its intended use.”*

177. Tai Twin Coast Cycle Trail (S425.010) request to insert the Pou Herenga Tai Cycle Trail Overlay Chapter that includes provisions that recognise and provide for the Trail in acknowledgement of the social, economic and environmental benefits it provides to the District as acknowledged by its classification as regionally significant infrastructure, enable appropriate activities, including the maintenance, operation, and upgrade of the Trail and to manage reverse sensitivity effects.

Analysis

178. A “Inclusionary housing chapter” is not listed the National Planning Standards district plan structure. While there could be merit in providing for inclusionary housing within proposed zones or a special purpose zone.
179. There is no evidence or detail in these submission points as such I am unable to assess the appropriateness of the relief sought. For these reasons I recommend these submission points are rejected.
180. The appropriateness or necessity of separating out infrastructure provisions is unclear. I recommend that this submission point is rejected due to the following reasons.
- The National Planning Standards District Plan Structure standard does not include a stormwater chapter.
 - Impermeable surfaces rules are proposed within each of the zone chapters. In my opinion, this is a best place for these rules to sit as other bulk and location controls sit within the zone chapters.
181. While some district plans nationwide have included a contaminated land chapter. I consider that is appropriate to avoid duplication in process and potential inconsistency, by relying upon the National environmental standard for Assessing and Managing contaminants in soil and to Protect Human Health (NESCS) rather than establishing a new chapter. I recommend that this submission is rejected.
182. The Cycle trail stretches 87km from the east coast (Opua) to the west coast (Horeke) transversing through several townships and smaller settlements. While I recognise that the Pou Hereanga Tai – Twin Coast Cycle Trail is an important tourism attraction for the Far North District, I consider that an introduction of an overlay chapter to the plan is not the most appropriate way to manage this piece of infrastructure and the supporting activities.
183. While I acknowledge the revitalisation of some of the communities as the result of the cycle trail the townships Opua, Kawakawa, Moerewa, Kaikohe,



Okaihau and Horeke have opportunities for development to support the cycle trail via urban or settlement zoned land. Currently the rural production zone provides some opportunities for development along the cycle trail, for example, small scale visitor accommodation, rural produce retail and rural tourism activity. The direction of the PDP to consolidate urban growth and development around reticulated networks, and settlements providing a range of compatible activities and services.

184. For these reasons I do not support the introduction of a Pou Herenga Tai Cycle Trail Overlay Chapter. The rezoning hearing will address the submission point seeking the mapping of the cycle trail.

Recommendation

185. I recommend all these submission points are rejected and no new chapters are introduced in the PDP.
186. I recommended that the submissions and further submissions be accepted, accepted in part or rejected as indicated in Appendix 2.

Section 32AA evaluation

187. No change to the provisions is recommended at this stage. On this basis, no evaluation under Section 32AA is required.

5.2.7 Key Theme 7: General Clarifications

Overview

Provision(s)	Officer Recommendation(s)
General Plan amendments including macron, spelling, Plan hyperlinks, duplications, numbering	Amend PDP provisions, marcons and spelling in the ePlan to ensure the hyperlinks work; and amend provisions to ensure consistency and integration across the PDP.

Analysis of Submissions on Key Theme 7

Matters raised in submissions

Submissions

188. Te Hiku Iwi Development Trust (399.010) seeks that the plan is amended so that the spelling of Mātauranga includes a macron. Also Submission 399.049 sought that the plan be amended to employ the consistent use of macrons over Māori vowels.
189. John Andrew Riddell (S431.071) seeks that Moturoa Island is spelt correctly throughout the plan.
190. FNDC (S368.036) request amendments where policies throughout the plan refer to Policy TW-P6, to include a link to that policy.



191. I recommend these submission points are addressed under clause 16 (2)
192. Alec Brian Cox (S170.008) seeks that that PDP is amended to address the following issues:

"Amendment required for clarity, Duplications, Typing, some of which render the section meaningless, Failure to follow standard numbering layout, Inconsistencies, Omission of key data such as SNAs, Mapped zones are not in agreement with zone definitions; and Section 32 Reports require revision to realistic figures."
193. Alec Brian Cox submission does not provide specific detail of the duplications or errors in sections therefore I recommend that this submission point is rejected. However, I note that minor errors, duplications and numbering can fixed as under Part 1, Schedule 1, clause 16 (2).
194. In my opinion the proposed zones have appropriately been mapped within the plan, I note that these zones will be subject to change as a result of the hearing process. Mr Cox has not provided specific reference to figures within the Section 32 Reports, however I note that section 32 evaluation is an on-going requirement and each s42A Report will be supported by a s32AA evaluation as appropriate. For these reasons I recommend that this submission is rejected.
195. Te Whatu Ora - Health New Zealand, Te Tai Tokerau (S42.018) support the PDP and request consequential amendments as necessary to ensure the outcomes proposed by these submissions can be properly integrated into the whole District Plan.
196. After further consideration, this submission point is in relation to consequential amendments as the result of changes sought by the submitter to the Hospital zone. I recommend that this submission point be deferred to the Hospital Zone hearing and be addressed within the relevant s42A Report.

Recommendation

197. I recommend the submitters seeking minor amendments to the PDP for Macrons, spelling and linkages are accepted and addressed under clause 16 (2).
198. I recommend that the submission point from Alec Brian Cox is rejected.
199. The submission from Te Whatu Ora – Health New Zealand regarding consequential amendments deferred to the Hospital Zone hearing and be addressed within the relevant s42A Report.
200. I recommended that the submissions and further submissions be accepted, accepted in part or rejected as indicated in Appendix 2.



Section 32AA

201. No changes are proposed, no evaluation under Section 32AA is required.

5.2.8 Key Issue 8: Submissions that sit outside the scope of the district plan review

Overview

Provision(s)	Officer Recommendation(s)
Proposed District Plan	No changes submissions that are outside the scope of District plan review

Analysis of Submissions on Key Issue 8

202. The submissions which raise issues that are considered outside the scope of the District Plan Review fall into five main categories:

- Pets and pet ownership
- Development contributions
- Resource consent system
- Supporting documents
- Other

203. I discuss each in turn.

Pet/ Pet ownership

Submissions

204. Nineteen original submission points from four submitters (S354, S460, S469, S566) were received on the issue of pets and pet ownership in the PDP.

205. The primary submitter The BOI Watchdogs requests various relief including that of responsible pet ownership, website content, overarching statements, management direction and communication, desexing and breeding regulations, consultation and enforcement.

Analysis

206. In my opinion these matters are outside the scope of what can be considered within the PDP process and/or are dealt with by other areas of Council and agencies. I have accordingly where possible referred this feedback to the appropriate Council teams. On this basis, I recommend these submission points are rejected.

Development Contributions



Submissions

207. Five original submission points from five submitters (S449, S338, S529, S427, S522) were received on development contributions.
208. Northland Kapiro Conservation Trust (S449.014), Our Kerikeri Community Charitable Trust (S338.013) and Carbon Neutral NZ Trust (S529.013) request to amend the PDP to require development contributions when Council has adopted policy on development contributions as part of its Long-Term Plan.
209. Kapiro Residents Association (S427.009) and Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S522.009) both support the PDP in part and request that provisions are included for meaningful development contributions to address the need for, and cost of, infrastructure.

Analysis

210. Development contributions are a mechanism under the Local Government Act 2002 ("LGA"), which can be established by Council to require payment of development contributions to help recover cost of infrastructure to support growth. Council originally introduced a Development Contributions Policy in 2003. In 2014 Council decided that it was not justifiable to continue to charge development contributions due to a variety of factors at that time. Such contributions are based on a new developments demand on council's network infrastructure, which can include community infrastructure, open space and reserves.
211. Financial contribution conditions are a mechanism under the RMA which either requires a contribution of money or land, or can be a combination of the two (s108(9)). Financial contributions can assist with the costs of providing infrastructure for developments and providing for the recreational needs of the community. Funds can also be used to provide upgraded or additional servicing or to acquire or enhance land or assets for recreation and community purposes. Councils must specifically use these monies collected for the purposes they are intended.
212. Financial contributions can be taken to provide off site 'offset' mitigation, eg, where the adverse effects of replacing a bridge on a riverbed habitat cannot be avoided or satisfactorily mitigated, a financial contribution could be used to improve the riverbed habitat elsewhere as part of a wider riverbed restoration programme.
213. Council is unable to 'double dip' and take development contributions for the same project as financial contributions and great care is needed to ensure that a financial contribution is not imposed on a development for the same purpose as a development contribution.
214. As notified the PDP did not include financial contributions, in the absence of specific relief sought I am unable to recommend the introduction of financial contributions as an alternative solution to the relief sought.



Council is currently investigating the appropriateness of contributions in some form. This may be revisited in the PDP at a later date. However, at the time of writing this report no decisions had been made by Council.

215. For the reasons above I recommend that the submission points on development contributions are rejected.

Resource consent system

Submissions

216. Five original submission points from five submitters (S449, S338, S529, S427, S522) were received on RC System.
217. Kapiro Conservation Trust (S449.041), Our Kerikeri Community Charitable Trust (S338.041), Carbon Neutral NZ Trust (S529.040), Kapiro Residents Association (S427.028) and Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S522.027) all request for a resource consent system to have a two-queue system, comprising one queue for applications for small simple minor works by the general public, and a separate queue for other larger or more complex applications.

Analysis

218. The resource consents system is directed by the RMA and the Resource consenting team. The RMA already has several mechanisms to provide different resource consent processes:
- i. Allowing consent authorities to deem some activities as permitted in the case of a marginal or temporary rule beach
 - ii. Streamlined process for 'boundary activities' to follow where the relevant neighbour(s) have provided written approval.
219. Council also has an internal process for simple resource consent applications for activities with a controlled activity status which affords a streamlined process. These submission points will be shared with the Resource Consents team. Processing of all resource consents, regardless of size and complexity is required to 'avoid' unreasonable delay.
220. In my opinion these matters are outside the scope of what can be considered within the PDP process. On that basis I recommend these points are rejected.

Supporting Documents

Submissions

221. Pacific Eco-Logic (S451.021) and Kapiro Conservation Trust (S442.165) both request an environmental monitoring and compliance strategy as an Appendix to be inserted into the Plan. And the implication of a public awareness programme with Northland Regional Council to inform people



between of the requirements for consent for activities such as vegetation clearance, land drainage and earthworks.

222. Te Tii (Waitangi) B3 Trust (S538.001) request insertion of a mitigation management plan into the PDP which addresses effects of climate change in the Waitangi area. Te Tii (Waitangi) B3 Trust (S538.002) further seek incorporation of a planned approach to upgrade community drainage and services and address effects of coastal erosion at Te Tii Beach and Waitangi.
223. FENZ (S512.119) request to amend advisory information posted on Council's website listing documents incorporated by reference, particularly as relates to SNZ PAS 4509:2008 - New Zealand Fire Service firefighting water supplies code of practice.

Analysis

224. Council is required under section 35 of the RMA to undertake monitoring of the state of the environment of the district, including efficiency and effectiveness of policies and rules, and monitoring of resource consent conditions. Environmental monitoring and compliance have been considered through the review of the district plan and informed section 32 evaluations. In my opinion, environmental monitoring should be completed in accordance with the requirements of the RMA and a strategy should not be included in the District Plan and I recommend that this submission is rejected.
225. In regard to the introduction of a mitigation management plan which addresses effects of climate change in the Waitangi area, the submitter has not provided sufficient information to support the introduction of a mitigation plan. I note that Council is working at a regional and local level to support iwi and hapū-led adaptation to climate change as part of the adopted Te Taitokerau Climate Adaptation Strategy. I recommend that this submission be rejected.
226. I note that the submission from Fire and emergency NZ is outside the scope of the district plan, therefore I recommend that this submission is rejected. I confirm that I passed this request to the Council team to amend the website.

Other

Submissions

227. Russell Landcare Trust (276.001) made a submission about the plan and its useability, and the online submission portal.
228. While I acknowledge some submitters may have experienced problems with plan useability and access, Council had hard copies of the plan available at service centres and provided a "friend of submitter service".



The National Planning Standards specify that Council must use a e-planning tool. This submission point is related to the accessibility and useability and not the district plan content. On this basis I recommend this submission point be rejected.

229. John Joseph and Jacqueline Elizabeth Matthews (S439.012) and Sean Jozef Vercammen (S395.014) request that the Council avoid stating any support for the Water Services Entities Bill.

230. These submissions are out of scope of the District plan as they relate only to the three waters. I recommend these submission points are rejected.

Recommendation

231. I recommend all the above submission points are rejected as they are outside the scope of the PDP.

232. I recommended that the submissions and further submissions be accepted, accepted in part, or rejected as indicated in Appendix 2.

Section 32AA evaluation

233. No change to the provisions is recommended at this stage. On this basis, no evaluation under Section 32AA is required.

6. Conclusion

234. This report has provided an assessment of submissions received in relation to Part 1 and General/ Miscellaneous. The primary amendments that I have recommended relate to:

- Minor amendments to the significant management issues
- Minor amendments to the General Process section
- Inclusion of a reference to new National Policy statements
- Plan wide amendments that require further consideration

235. Section 5.2 considers and provides recommendations on the decisions requested in submissions. I recommend that the submissions on the Part 1 General/Miscellaneous should be accepted, accepted in part, rejected or rejected in part, as set out in my recommendations of this report.

236. I recommend that provisions for the Part 1 General/Miscellaneous matters be amended as set out in Appendix 2 – Officer recommendations Part 1 General/Miscellaneous below for the reasons set out in this report.

237. I consider that the amended provisions will be efficient and effective in achieving the purpose of the RMA (especially for changes to objectives), the relevant objectives of this plan and other relevant statutory documents, for the reasons set out in the Section 32AA evaluations undertaken.



Recommended by: Sarah Trinder – Planner, Barker and Associates

Approved by: James R Witham – Team Leader District Plan, Far North District Council.

Date: 29 April 2024