



Proposed Far North District Plan

Volume 5 - Summary of Decisions Requested

SUMMARY OF SUBMISSIONS

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S521)	S521.011	Subdivision	Rules	Support in part	The PDP should require all new buildings to store/use roof water wherever possible, to avoid the need for expensive reticulation systems and reduce the need for water top-ups via water tankers. New buildings connected to a public water supply should be required to collect roof water in storage vessels to use for gardens and flushing toilets (at minimum) and contribute to other household water uses such as laundry connections. Water storage vessels do not need to be a traditional round tank - other useful shapes exist, such as rectangular upright vessels that are easy to install against the side of a house or garage, or short flat vessels designed to be completely buried underground or placed under the foundations of new builds. Greywater harvesting and re-use should also be required for new buildings. These types of water-saving measures would also reduce future Council infrastructure costs for additional water supplies and wastewater.	Amend PDP to require best practice water-sensitive, low-impact designs and measures for all stormwater and wastewater engineering, infrastructure and related development, to prevent problems associated with more extreme rainfall events in future, including provision to implement relevant parts of NPS-FM
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S521)	S521.014	Subdivision	Rules	Support in part	We support the principle of PDP provisions controlling the area of impermeable surface per site, and consider it is probably also necessary to monitor and limit the total cumulative impermeable area in residential/urban zones.	Amend to provide for greater limits on impermeable areas (and/or requirements for minimum permeable areas) for subdivision, use and development. In urban/residential zones, it will also be necessary to adopt measures to limit the cumulative total impermeable surface and/or protect a specified cumulative total permeable area.
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S521)	S521.017	Subdivision	Rules	Support in part	It should be encouraged in the form of well-designed two or three storey buildings, for example, with requirements for permeable open areas including garden/landscaped ground. Developments should use permeable materials wherever feasible for surfaces such as driveways, paths.	Amend PDP to include objectives, policies and rules/standards that require best practice environmentally sustainable techniques for new developments, including -

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					<p>The PDP should require all new buildings to store/use roof water wherever possible, to avoid the need for expensive reticulation systems and reduce the need for water top-ups via water tankers. New buildings connected to a public water supply should be required to collect roof water in storage vessels to use for gardens and flushing toilets (at minimum) and contribute to other household water uses such as laundry connections. Water storage vessels do not need to be a traditional round tank - other useful shapes exist, such as rectangular upright vessels that are easy to install against the side of a house or garage, or short flat vessels designed to be completely buried underground or placed under the foundations of new builds. Greywater harvesting and re-use should also be required for new buildings. These types of water-saving measures would also reduce future Council infrastructure costs for additional water supplies and wastewater.</p> <p>Passive heating and cooling designs, for example, reduce energy consumption and the on-going costs of heating/cooling. Solar panels with batteries, for example, can be purchased on lease-to-buy schemes so that the owner/occupier only pays the amount that they would have paid anyway for grid electricity. Additional electricity generation by households will be essential for powering EVs in future because current national generation capacity is not sufficient.</p>	<ul style="list-style-type: none"> • Permeable materials wherever feasible for surfaces such as driveways, paths etc. • Best practice for lowest environmental impact and water sensitive designs, requiring greywater recycling techniques and other technologies to ensure efficient use of water, rain storage tanks for properties connected to a public water supply, additional water storage for buildings that rely solely on roof water (to cope with drought), and other measures • Renewable energy technologies and energy-efficient technologies, and similar requirements that foster improved environmental design/technologies and lower lifecycle climate impacts • Specified area (percentage) of tree canopy cover and green corridors should be required within new subdivisions. These will be increasingly important for shade/cooling for buildings and pedestrians in future.
<p>Vision Kerikeri (Vision for Kerikeri and</p>	<p>S522.055</p>	<p>Subdivision</p>	<p>Rules</p>	<p>Support in part</p>	<p>No specific reason for this decision sought.</p>	<p>Amend the PDP to wherever possible require or at least promote the creation of community open spaces, green open spaces, green</p>

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Environs, VKK) (S522)						corridors and linkages to support active transport, amenity and community wellbeing.
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)	S523.016	Subdivision	Rules	Support in part	<p>As noted, there is increasing need to support connectivity and active modes of transport. RMA (s77, s230, s237F etc.) specifically allow councils to include a DP rule that requires esplanade when lots of 4 ha or more are created by subdivision:</p> <p>'A territorial authority may include a rule in its district plan which provides that in respect of any allotment of 4 hectares or more created when land is subdivided, esplanade reserves or esplanade strips, of the width specified in the rule, shall be set aside or created, as the case may be, under section 230(5).' (RMA s77(2))</p> <p>Voluntary contribution: RMA s237F requires the council to compensate the landowner for esplanade associated with larger lots - unless the landowner agrees not to take compensation, as voluntary action.</p> <p>In addition, s200(1) of the Local Government Act 2002 allows developers to provide a reserve voluntarily, and s200(2) allows councils to accept voluntary contributions for reserves that are not included in a development contribution:</p> <p>'This subpart does not prevent a territorial authority from accepting from a person, with that person's agreement, additional contributions for reserves...'</p> <p>Third party funding: In addition, s200(1)(c) of LGA 2002 allows for a third party to fund a reserve (provided that the reserve is not included in a development contribution):</p> <p>'a third party has funded or provided, or undertaken to fund or provide, the same reserve...'</p> <p>This potentially opens the door for a benefactor or community group to raise funds for specific parcels of esplanade land.</p> <p>Our group considers that DP Policies/Rules</p>	Amend policies to require esplanade reserves/strips when subdivision creates lots of 4ha or more (as allowed under RMA s77, s230, etc.) when one of the following situations applies: <ul style="list-style-type: none"> - the owner agrees to provide the land on a voluntary basis, or - a third party agrees to provide funds to compensate the land owner for the land (at normal market value), or - the land is included in a development agreement or development contributions or financial contributions (under the RMA or LGA) or other arrangement

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					<p>should require esplanade reserves/strips when subdivision creates lots of 4ha or more (as allowed under RMA s77, s230, etc.) when one of the following situations applies:</p> <p>(a) the owner agrees to provide the land on a voluntary basis, or (b) a third party provides funds to compensate the land owner for the land (at normal market value), or</p> <p>(c) the land is included in a development agreement or development contributions or financial contributions (under the RMA or LGA).</p>	
<p>Carbon Neutral NZ Trust (S529)</p>	<p>S529.184</p>	<p>Subdivision</p>	<p>Rules</p>	<p>Support</p>	<p>As noted, there is increasing need to support connectivity and active modes of transport. RMA (s77, s230, s237F etc.) specifically allow councils to include a DP rule that requires esplanade when lots of 4 ha or more are created by subdivision:</p> <p>'A territorial authority may include a rule in its district plan which provides that in respect of any allotment of 4 hectares or more created when land is subdivided, esplanade reserves or esplanade strips, of the width specified in the rule, shall be set aside or created, as the case may be, under section 230(5).' (RMA s77(2))</p> <p>Voluntary contribution: RMA s237F requires the council to compensate the landowner for esplanade associated with larger lots - unless the landowner agrees not to take compensation, as voluntary action.</p> <p>In addition, s200(1) of the Local Government Act 2002 allows developers to provide a reserve voluntarily, and s200(2) allows councils to accept voluntary contributions for reserves that are not included in a development contribution:</p> <p>'This subpart does not prevent a territorial authority from accepting from a person, with that person's agreement, additional contributions for reserves...'</p> <p>Third party funding: In addition, s200(1)(c) of LGA 2002 allows for a third party to fund a reserve (provided that the reserve is not included in a development contribution):</p>	<p>Insert new policies/rules to require esplanade reserves/strips when subdivision creates lots of 4ha or more (as allowed under RMA s77, s230, etc.) when one of the following situations applies:</p> <ul style="list-style-type: none"> - the owner agrees to provide the land on a voluntary basis, or - a third party agrees to provide funds to compensate the land owner for the land (at normal market value), or - the land is included in a development agreement or development contributions or financial contributions (under the RMA or LGA) or other arrangement.

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					<p>'a third party has funded or provided, or undertaken to fund or provide, the same reserve...'</p> <p>This potentially opens the door for a benefactor or community group to raise funds for specific parcels of esplanade land.</p> <p>Our group considers that DP Policies/Rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more (as allowed under RMA s77, s230, etc.) when one of the following situations applies:</p> <p>(a) the owner agrees to provide the land on a voluntary basis, or</p> <p>(b) a third party provides funds to compensate the land owner for the land (at normal market value), or</p> <p>(c) the land is included in a development agreement or development contributions or financial contributions (under the RMA or LGA).</p>	
Carbon Neutral NZ Trust (S529)	S529.199	Subdivision	Rules	Support in part	No specific reason for this decision sought.	Amend the PDP to wherever possible require or at least promote the creation of community open spaces, green open spaces, green corridors and linkages to support active transport, amenity and community wellbeing
Carbon Neutral NZ Trust (S529)	S529.218	Subdivision	Rules	Support in part	We support the principle of PDP provisions controlling the area of impermeable surface per site, and consider it is probably also necessary to monitor and limit the total cumulative impermeable area in residential/urban zones.	Amend to provide for greater limits on impermeable areas (and/or requirements for minimum permeable areas) for subdivision, use and development. In urban/residential zones, it will also be necessary to adopt measures to limit the cumulative total impermeable surface and/or protect a specified cumulative total permeable area.
Carbon Neutral NZ Trust (S529)	S529.221	Subdivision	Rules	Support in part	It should be encouraged in the form of well-designed two or three storey buildings, for example, with requirements for permeable open areas including garden/landscaped ground.	Amend PDP to include objectives, policies and rules/standards that require best practice environmentally sustainable

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					<p>Developments should use permeable materials wherever feasible for surfaces such as driveways, paths.</p> <p>The PDP should require all new buildings to store/use roof water wherever possible, to avoid the need for expensive reticulation systems and reduce the need for water top-ups via water tankers. New buildings connected to a public water supply should be required to collect roof water in storage vessels to use for gardens and flushing toilets (at minimum) and contribute to other household water uses such as laundry connections. Water storage vessels do not need to be a traditional round tank - other useful shapes exist, such as rectangular upright vessels that are easy to install against the side of a house or garage, or short flat vessels designed to be completely buried underground or placed under the foundations of new builds. Greywater harvesting and re-use should also be required for new buildings. These types of water-saving measures would also reduce future Council infrastructure costs for additional water supplies and wastewater.</p> <p>Passive heating and cooling designs, for example, reduce energy consumption and the on-going costs of heating/cooling. Solar panels with batteries, for example, can be purchased on lease-to-buy schemes so that the owner/occupier only pays the amount that they would have paid anyway for grid electricity. Additional electricity generation by households will be essential for powering EVs in future because current national generation capacity is not sufficient.</p>	<p>techniques for new developments, including -</p> <ul style="list-style-type: none"> • Permeable materials wherever feasible for surfaces such as driveways, paths etc. • Best practice for lowest environmental impact and water sensitive designs, requiring greywater recycling techniques and other technologies to ensure efficient use of water, rain storage tanks for properties connected to a public water supply, additional water storage for buildings that rely solely on roof water (to cope with drought), and other measures • Renewable energy technologies and energy-efficient technologies, and similar requirements that foster improved environmental design/technologies and lower lifecycle climate impacts • Specified area (percentage) of tree canopy cover and green corridors should be required within new subdivisions. These will be increasingly important for shade/cooling for buildings and pedestrians in future.

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Carbon Neutral NZ Trust (S529)	S529.238	Subdivision	Rules	Not Stated	<p>Stormwater and wastewater should be fully managed to avoid sediment/pollutants being carried to waterways and wetlands, especially during high rainfall events which are expected to become more extreme due to climate change. Under s7(i) of the RMA, councils must have particular regard to the effects of climate change.</p> <p>In general, water sensitive and low impact designs should be a standard requirement, not just encouraged. For example, stormwater and water from wastewater disposal fields can carry pollutants and silt into waterways during high rainfall events. They should not be discharged directly into waterways but be retained in constructed wetlands (vegetated retention ponds) or other water sensitive and low impacts features.</p>	Amend the plan so that water sensitive and low impact designs are a standard requirement
Carbon Neutral NZ Trust (S529)	S529.241	Subdivision	Rules	Support in part	<p>The disposal of wastewater from sewage treatment plants into wetlands and water bodies has been a matter of concern to communities for some time. The Council's Infrastructure Committee requested further investigation of disposal-to-land options for several wastewater schemes, and requested a wastewater disposal-to-land workshop in late 2021 to cover methodologies and processes associated with establishing a disposal-to-land scheme</p> <p>The PDP should include provisions to encourage and progressively require disposal-to-land wastewater treatment methods (based on coagulation and flocculation) and ensure the responsible use of solid waste from treatment plants as fertilizer and the use of wastewater for irrigation purposes.</p>	Insert provisions to encourage and progressively require disposal-to-land wastewater treatment methods (based on coagulation and flocculation) and ensure the responsible use of solid waste from treatment plants as fertilizer and the use of wastewater for irrigation purposes.
Kāinga Ora Homes and Communities (S561)	S561.046	Subdivision	Notes	Support in part	<p>The reference to "potentially affected" is not specific and the comment should clarify that this relates to the mapped hazard areas.</p>	Amend Note 4 as follows: 4. Any application for a resource consent in relation to a site that is potentially affected by natural hazards identified by the mapped natural hazards (as

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						<p>noted in the Plan definitions) must be accompanied by a report prepared by a suitably qualified and experienced engineer that addresses the matters identified in the relevant objectives, policies, performance standards and matters of control/discretion including an assessment of whether the site includes an area of land susceptible to instability.</p>
<p>New Zealand Pork Industry Board (S55)</p>	<p>S55.018</p>	<p>Subdivision</p>	<p>SUB-R1</p>	<p>Support in part</p>	<p>The objective to avoid reverse sensitivity issues should be clearly articulated within the rules.</p>	<p>Amend the rule to clearly reference reverse sensitivity effects as follows: Matters of control are limited to: ... h. adverse reverse sensitivity effects arising from landuse incompatibility including but not limited to noise, vibration, smell, smoke, dust and spray.</p>
<p>Lynley Newport (S119)</p>	<p>S119.001</p>	<p>Subdivision</p>	<p>SUB-R1</p>	<p>Support in part</p>	<p>The submitter is generally in support of this rule however, does not consider that boundary adjustments should comply with SUB-S6 in order to remain a controlled activity. Often rural boundary adjustments will be of vacant land and are being carried out to rationalise property boundaries with no development of the vacant land being intended. It is considered too prescriptive to require power and telecommunications to the boundaries in this case.</p>	<p>Amend SUB-R1 to read as below and delete SUB-S6 Telecommunications and Power Supply CON-1</p> <ol style="list-style-type: none"> 1. The boundary adjustment complies with standards: SUB-1 Minimum allotment sizes for controlled activities, except where existing allotments are

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						<p>already of a size that is non-compliant, the overall degree of non-compliance is not be increased; SUB-S2 Requirements for building platforms for each allotment; SUB-S3 Water supply; SUB-S4 Stormwater management; SUB-S5 Wastewater disposal; and SUB-S6 Easements for any purpose;</p>
<p>Bentzen Farm Limited (S167)</p>	<p>S167.055</p>	<p>Subdivision</p>	<p>SUB-R1</p>	<p>Support in part</p>	<p>Many existing lots do not comply with the minimum lot size standards and subdivisions should also be enabled where boundary adjustments to such lots do not increase the number of lots created. The effect of the non-confirming lot already exists and therefore allowing boundary adjustments will not give rise to further effects on the environment.</p>	<p>Amend Rule SUB-R1 as follows: CON-1 The boundary adjustment complies with standards: SUB-1 Minimum allotment sizes for controlled activities, except where an existing allotment size is already non-compliant, the degree of non-compliance shall not be increased; SUB-S2 Requirements for building platforms for each allotment; SUB-S3 Water supply; SUB-S4 Stormwater management; SUB-S5 Wastewater disposal; SUB-S6 Telecommunications and power supply; and SUB-S7 Easements for any purpose;</p>

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Setar Thirty Six Limited (S168)	S168.056	Subdivision	SUB-R1	Support in part	Many existing lots do not comply with the minimum lot size standards and subdivisions should also be enabled where boundary adjustments to such lots do not increase the number of lots created. The effect of the non-confirming lot already exists and therefore allowing boundary adjustments will not give rise to further effects on the environment.	Amend Rule SUB-R1 as follows: CON-1 The boundary adjustment complies with standards: SUB-1 Minimum allotment sizes for controlled activities, except where an existing allotment size is already noncompliant, the degree of non-compliance shall not be increased; ...
The Shooting Box Limited (S187)	S187.048	Subdivision	SUB-R1	Support in part	Many existing lots do not comply with the minimum lot size standards and subdivisions should also be enabled where boundary adjustments to such lots do not increase the number of lots created. The effect of the non-confirming lot already exists and therefore allowing boundary adjustments will not give rise to further effects on the environment.	Amend Rule SUB-R1 as follows: CON-1 The boundary adjustment complies with standards: SUB-1 Minimum allotment sizes for controlled activities, except where an existing allotment size is already noncompliant, the degree of non-compliance shall not be increased; SUB-S2 Requirements for building platforms for each allotment; SUB-S3 Water supply; SUB-S4 Stormwater management; SUB-S5 Wastewater disposal; SUB-S6 Telecommunications and power supply; and SUB-S7 Easements for any purpose;

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Thomson Survey Ltd (S191)	S191.001	Subdivision	SUB-R1	Support in part	<p>Generally I support this rule as written. It is essential to keep basic boundary adjustments as simple as possible to achieve. However, I disagree with boundary adjustments having to comply with SUB-56 in order to remain a controlled activity. Often rural boundary adjustments will be of vacant land and are being carried out simply to rationalise property boundaries with no 'development' of that vacant land necessarily intended. It seems unusually prescriptive to therefore insist on power and telecommunications connections to new boundaries.</p> <p>I also disagree with the wording of CON-1, 1. SUB-1 It needs to be clear that the 'degree of non compliance' can be assessed in terms of the overall boundary adjustment, not on the basis of an individual lot being created. I say this because I've encountered numerous instances where the boundary adjustment is of lots already non-compliant in terms of size. The boundary adjustment will result in one becoming smaller (more 'non-compliant'), but the other larger (less 'non-compliant'). Overall the level of non-compliance across the allotments is therefore not increased. This should be reflected in amended wording.</p> <p>Finally, I disagree with CON-2, 1. iii. This rule requires access locations to remain the same, regardless of whether or not an access point would be better placed elsewhere as part of the boundary adjustment, i.e. improved site distances. Overall, the number of access points would remain the same. It should be possible to move an access point if it would better service the lot, and improve safety.</p>	<p>Amend SUB-R1 as follows Amend CON-1, 1. SUB-1 to read: <i>"... except where existing allotments are already of a sizethat is non-compliant, the overall degree of non-compliance is not increased."</i> Amend CON-1 by deleting the words SUB-56 Telecommunications and Power Supply. Amend CON-2, 1. iii. to read:"the number of access points; and"</p>
Wendover Two Limited (S222)	S222.052	Subdivision	SUB-R1	Support in part	<p>Many existing lots do not comply with the minimum lot size standards and subdivisions should also be enabled where boundary</p>	<p>Amend Rule SUB-R1 as follows: CON-1 The boundary adjustment complies</p>

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					<p>adjustments to such lots do not increase the number of lots created. The effect of the non-confirming lot already exists and therefore allowing boundary adjustments will not give rise to further effects on the environment.</p>	<p>with standards:SUB-1 Minimum allotment sizes for controlled activities, except where an existing allotment size is already non-compliant, the degree of non-compliance shall not be increased; SUB-S21 Requirements for building platforms for each allotment; SUB-S32 Water supply; SUB-S43 Stormwater management; SUB-S54 Wastewater disposal; SUB-S65 Telecommunications and power supply; and SUB-S76 Easements for any purpose;.....</p>
<p>Matauri Trustee Limited (S243)</p>	<p>S243.073</p>	<p>Subdivision</p>	<p>SUB-R1</p>	<p>Support in part</p>	<p>Many existing lots do not comply with the minimum lot size standards and subdivisions should also be enabled where boundary adjustments to such lots do not increase the number of lots created. The effect of the non-confirming lot already exists and therefore allowing boundary adjustments will not give rise to further effects on the environment.</p>	<p>Amend Rule SUB-R1 as follows: CON-1 The boundary adjustment complies with standards:SUB-1 Minimum allotment sizes for controlled activities, except where an existing allotment size is already non-compliant, the degree of non-compliance shall not be increased; SUB-S2 Requirements for building platforms for each allotment; SUB-S3 Water supply;</p>

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						SUB-S4 Stormwater management; SUB-S5 Wastewater disposal; SUB-S6 Telecommunications and power supply; and SUB-S7 Easements for any purpose;
Our Kerikeri Community Charitable Trust (S272)	S272.006	Subdivision	SUB-R1	Support	Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more. PDP provisions that normally require esplanade reserves when consenting land use and other forms of development. Improve provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values.	Retain SUB-R1 including reference to SUB-S8
P S Yates Family Trust (S333)	S333.048	Subdivision	SUB-R1	Support in part	Many existing lots do not comply with the minimum lot size standards and subdivisions should also be enabled where boundary adjustments to such lots do not increase the number of lots created. The effect of the non-confirming lot already exists and therefore allowing boundary adjustments will not give rise to further effects on the environment	Amend Rule SUB-R1 as follows: CON-1 The boundary adjustment complies with standards: SUB-1 Minimum allotment sizes for controlled activities, except where an existing allotment size is already noncompliant, the degree of non-compliance shall not be increased; SUB-S2 Requirements for building platforms for each allotment; SUB-S3 Water supply;

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						SUB-S4 Stormwater management; SUB-S5 Wastewater disposal; SUB-S6 Telecommunications and power supply; and SUB-S7 Easements for any purpose;
Sapphire Surveyors Limited (S348)	S348.009	Subdivision	SUB-R1	Support in part	This rule makes no distinction between enormous changes in boundaries where people are utilising multiple titles (effectively a boundary "relocation" and a full subdivision) and small tweaks of boundaries (boundary "adjustments") where perhaps a structure has inadvertently ended up on the neighbour's property or a transfer of a back paddock to a neighbour. In the latter case, the effects are (usually) nil and so there is no requirement under the RMA 1991 to mitigate these effects. Therefore CON-3 and the requirements outlined under the matters of control are not appropriate or applicable	Insert a separate rule for boundary "adjustments" (in comparison to boundary "relocations" which already has this rule and should perhaps just be dealt with like any other subdivision). Perhaps adjustments could be defined as: <ol style="list-style-type: none"> 1. involving the lesser of 10% of the area of the smaller title involved (to a maximum of 500m²), or 2. involve the transfer of land between two properties in different ownership and management, which makes no change to land use.
John Andrew Riddell (S431)	S431.072	Subdivision	SUB-R1	Not Stated	Well designed subdivision is an important component of achieving sustainable use and development of natural and physical resources, and in establishing and continuing character and sense of place. There is an inappropriate emphasis on ensuring that vehicle requirements and needs are provided for in the subdivision rules. In urban areas and settlements and in their surrounds good resource management practice is for increased provision for cycling and other active transport and for walking access. Indeed this is a	Insert the following as further matters of control in all controlled activity subdivision rules and as further matters of discretion in all restricted discretionary activity subdivision rules: <ul style="list-style-type: none"> • consistency with the scale, density, design and character of the

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					necessary measure to help mitigate and adapt to the effects of climate change.	<p>environment and purpose of the zone</p> <ul style="list-style-type: none"> • measures to mitigate and adapt to climate change • where relevant, measures to provide for active transport, protected cycleways and for walking
Kapiro Conservation Trust (S445)	S445.009	Subdivision	SUB-R1	Support	<p>Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.</p> <p>In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section):</p> <ul style="list-style-type: none"> - 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3) - 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3) 	Retain SUB-S8 in SUB-R1
Waiaua Bay Farm	S463.046	Subdivision	SUB-R1	Oppose	Based on section 2.2 of the KCZ s32 report, the Proposed Plan will make the Natural Heritage	Amend the rules to clarify the activity status for subdivision

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Limited (S463)					<p>subzone in the KCZ default to the new Natural Open Space Zone.</p> <p>It is unclear if a boundary adjustment to contain, but not bisect, land in the NOSZ would be non-complying. WBF would oppose a non-complying consenting pathway for a boundary adjustment that is merely needed to create a lot specifically to enclose land in the NOSZ.</p> <p>It may be necessary, when future residential subdivision occurs at Kauri Cliffs, to undertake a boundary adjustment (or create a lot) around the Natural Heritage subzone, as this is currently contained within a larger lot (Lot 4 DP 50234). A default non-complying activity status for a boundary adjustment of this nature appears to be inconsistent with the Proposed Plan's directions that otherwise seek to protect and maintain significant indigenous biodiversity as in the Natural Heritage subzone.</p>	<p>(including boundary adjustments) that adjusts boundaries around, but does not create boundaries through, land in the NOSZ.</p> <p>(See also WBF's submissions on rule SUB-R3 (submission point S463.047 and S463.048)).</p>
Northland Planning and Development 2020 Limited (S502)	S502.081	Subdivision	SUB-R1	Support in part	<p>Using the word alter it has the unintended consequence of capturing boundary adjustments which decrease the number of allotments provided. Boundary adjustments that decrease the number of titles should have the ability to comply with the Controlled activity provisions as such we seek to use the word 'increase' to clarify this situation.</p>	<p>Amend SUB-R1 CON-2 CON-2</p> <p>1. the boundary adjustment does not alter:</p> <p>i. alter the ability of existing activities to continue to be permitted under the rules and standards in this District Plan;</p> <p>ii. alter the degree of non compliance with zone or district wide standards;</p> <p>iii. alter the number and location of any access; and</p> <p>iv. increase the number of certificates of title.</p>
Vision Kerikeri	S523.006	Subdivision	SUB-R1	Support	<p>Our group supports policies and rules that will require the creation of esplanade reserves/strips</p>	<p>Retain SUB-R1</p>

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(Vision for Kerikeri and Environs, VKK) (S523)					<p>along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.</p> <p>In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section):</p> <ul style="list-style-type: none"> - 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3) - 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3) 	
Carbon Neutral NZ Trust (S529)	S529.061	Subdivision	SUB-R1	Support	<p>Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision.</p> <p>PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more.</p> <p>PDP provisions that normally require esplanade reserves when consenting land use and other forms of development.</p> <p>Improve provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values.</p>	Retain SUB-R1 which includes SUB-S8
New Zealand Pork	S55.019	Subdivision	SUB-R2	Support in part	<p>The objective to avoid reverse sensitivity issues should be clearly articulated within the rules.</p>	Amend the rule to clearly reference reverse sensitivity effects as follows:

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Industry Board (S55)						Matters of control are limited to: ... h. adverse reverse sensitivity effects arising from landuse incompatibility including but not limited to noise,vibration, smell, smoke, dust and spray.
Terra Group (S172)	S172.007	Subdivision	SUB-R2	Support	Support this rule, specifically the minimum dimensions required within the Rural Residential zone as it will achieve positive outcomes for the proposed zone.	Retain as notified (inferred)
Waka Kotahi NZ Transport Agency (S356)	S356.087	Subdivision	SUB-R2	Support	not stated	Retain SUB-R2 as notified
John Andrew Riddell (S431)	S431.073	Subdivision	SUB-R2	Not Stated	Well designed subdivision is an important component of achieving sustainable use and development of natural and physical resources, and in establishing and continuing character and sense of place. There is an inappropriate emphasis on ensuring that vehicle requirements and needs are provided for in the subdivision rules. In urban areas and settlements and in their surrounds good resource management practice is for increased provision for cycling and other active transport and for walking access. Indeed this is a necessary measure to help mitigate and adapt to the effects of climate change.	Insert the following as further matters of control in all controlled activity subdivision rules and as further matters of discretion in all restricted discretionary activity subdivision rules: <ul style="list-style-type: none"> • consistency with the scale, density, design and character of the environment and purpose of the zone • measures to mitigate and adapt to climate change • where relevant, measures to provide for active transport, protected cycleways and for walking

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FNR Properties Limited (S437)	S437.005	Subdivision	SUB-R2	Support	The provision is supported as it represents a positive change for 142 and 134 North Road, Kaitaia and surrounding properties.	Retain SUB-R2 as notified.
Puketona Business Park Limited (S45)	S45.014	Subdivision	SUB-R3	Not Stated	Should the Rural Production zone be retained for 759 State Highway 10, Oromahoe, suggest that where a parent site comprises less (especially significantly less) than the proposed minimum allotment size, this should be reflected in an activity status to subdivide below that threshold. As an example, 759 State Highway 10, Oromahoe, comprises 2.31ha and any subdivision would result in a non-complying activity status when it cannot achieve the minimum. It is considered in this circumstance, a discretionary activity status is acceptable to enable a fulsome and unfettered assessment of actual and potential effects.	Amend the activity status for subdivision options applying to 759 State Highway 10, Oromahoe, if it retains its Rural Production zoning - to recognise the size of sites and provide options for discretionary activity subdivision.
Puketona Business Park Limited (S45)	S45.015	Subdivision	SUB-R3	Support	The proposed minimum allotment sizes for the Light Industrial zone and corresponding controlled activity status are supported, as well as the possibility of seeking smaller allotments as a discretionary activity.	Retain allotment areas for subdivision in the Light Industrial zone.
New Zealand Pork Industry Board (S55)	S55.020	Subdivision	SUB-R3	Support in part	The objective to avoid reverse sensitivity issues should be clearly articulated within the rules.	Amend the rules to clearly reference reverse sensitivity effects as follows: Matters of control are limited to: ... h. adverse reverse sensitivity effects arising from landuse incompatibility including but not limited to noise, vibration, smell, smoke, dust and spray.
Horticulture New Zealand (S159)	S159.070	Subdivision	SUB-R3	Support in part	A controlled activity subdivision status means that affected parties would not be consulted as part of the subdivision application. This is particularly relevant to the Horticulture zone and the Rural Production zone where the potential for adverse effects on adjoining land uses exist and effects on highly productive land which the	Delete the reference to the Rural Production zone and Horticulture zone from the controlled activity rule. Insert a new line in Rule SUB-R3Rural Production and Horticulture zone as follows: Activity status -

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					<p>plan seeks to protect. A controlled activity will not achieve that outcome. Support consideration of incompatibilities of activities</p>	<p>Restricted discretionary RDIS-1 Where subdivision complies with standards:</p> <ul style="list-style-type: none"> • SUB-S1 minimum lot sizes • SUB-S2 Requirements for building platform for each allotment • SUB-S3 Water supply • SUB-S4 Stormwater management • SUB-S5 Wastewater disposal • SUB-S6 Telecommunications and power supply • SUB-S7 Easements for any purpose <p>Matters of discretion are limited to:</p> <ul style="list-style-type: none"> • Matters of control in SUB-R3 • The potential adverse effects on adjoining horticultural and agricultural activities, including reverse sensitivity effects

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						NOTE: Applications for restricted discretionary subdivision within the Horticulture zone and the Rural Production zone will be notified Activity status where compliance is not achieved - Discretionary
Bentzen Farm Limited (S167)	S167.056	Subdivision	SUB-R3	Support	The rule provides an appropriate range of standards and controlled activity matters for subdivision.	Retain Rule SUB-R3
Setar Thirty Six Limited (S168)	S168.057	Subdivision	SUB-R3	Support in part	The rule provides an appropriate range of standards and controlled activity matters for subdivision.	Retain Rule SUB-R3
Terra Group (S172)	S172.005	Subdivision	SUB-R3	Support	Support this rule, specifically CON-1 and CON-2 regarding the Rural Residential zone as it will achieve positive outcomes for the proposed zone.	Retain as notified (inferred)
The Shooting Box Limited (S187)	S187.049	Subdivision	SUB-R3	Support	The rule provides an appropriate range of standards and controlled activity matters for subdivision.	Retain Rule SUB-R3.
Haigh Workman Limited (S215)	S215.026	Subdivision	SUB-R3	Support in part	The Controlled Activity subdivision rules do not appear to require compliance with the Transport section of the Plan. As subdivision is one area where access is critical, the Transport rules should apply to subdivisions.	Amend SUB-R3 to require compliance with Transport rules in the Plan for a subdivision to be a Controlled Activity.
Matauri Trustee Limited (S243)	S243.074	Subdivision	SUB-R3	Support	The rule provides an appropriate range of standards and controlled activity matters for subdivision.	Retain Rule SUB-R3
Margaret Sheila Hulse and John Colin Hulse (S247)	S247.004	Subdivision	SUB-R3	Support in part	We are concerned that no further residential subdivisions should be approved before there is enough medical infrastructure within Kerikeri and Waipapa areas to support extra families living here. Our chief concern is that all the local GP practices have closed their books to new	Amend rule SUB -R3 by adding an additional condition to read: "CON-,3 where thesubdivision is for residential development, primary medicalcare services are availableand adequate to support

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					patients, and with more people being allowed to settle here they will not be covered with adequate medical facilities should they need it, despite being told to the contrary. A number of local residents have agreed with us that this is an ongoing issue which will get worse if not addressed.	the wellbeing,health and safety of additional people." Addto the right hand column: "Activity status where compliance not achieved with CON-3:Non-complying."
Heather Golley (S254)	S254.002	Ecosystems and indigenous biodiversity	SUB-R3	Oppose	<p>Opposes objectives, sections, policies, rules, regulations, practice notes, and supporting documentation which relates to wellbeing, dog owners, dogs, the banning of dogs and cats (via resource consent conditions, covenants or consent notices), the impact of dogs on the environment, kennels, sub-divisions, dogs and their relationship with native flora and fauna, significant natural areas, zoning which limits dog ownership, and dog limits placed on Significant Natural Areas (SNAs). There is no identification of SNA's or the "Kiwi" areas referred to in the provisions, that also makes it impossible to properly understand and assess the impact of the DP on individuals and or the district. Our dogs are our family members, best friends, counsellors, workmates, pig hunters, and brilliant farmhands. Cats are family to many people, especially the elderly. Submitter does not accept that FNDC has a right to ban and restrict her family from owning pets responsibly, anywhere in Northland. FNDC needs to consider the unintended consequences of their actions including but not limited to:</p> <ul style="list-style-type: none"> - humanitarian and mental health crises with people having to relinquish pets - animal rescue services and pounds being overwhelmed with dogs and cats, financially stressed - fewer children living in homes which have dogs and cats, which means they will increase their risk of harm from dogs because they will not learn how to care for, respect, and control 	Amend the provisions of the District Plan so they do not limit dog ownership or result in the banning of dogs and cats (via resource consent conditions, covenants or consent notices) (inferred). Make critical supporting documents, and all other undisclosed relevant information publicly available now, including Draft SNA maps, The 'Practice Note for Significant Indigenous Flora and Fauna', and the 'Bay of Islands Kiwi Distribution Map - Support Document'.

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					their dogs. - less positive view of our district as a retirement area.	
Waitoto Development Limited (S263)	S263.030	Subdivision	SUB-R3	Support	The submitter considers that rule SUB-R3 as it relates to the Orongo Bay zone is appropriate as the allotment size reflects the operative district plan and original development plan approval.	Retain rule SUB-R3.
Our Kerikeri Community Charitable Trust (S272)	S272.007	Subdivision	SUB-R3	Support in part	Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more. PDP provisions that normally require esplanade reserves when consenting land use and other forms of development. Improve provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values.	Retain SUB-R3 including reference to SUB-S8
P S Yates Family Trust (S333)	S333.049	Subdivision	SUB-R3	Support	The rule provides an appropriate range of standards and controlled activity matters for subdivision	Retain Rule SUB-R3
Neil Construction Limited (S349)	S349.014	Subdivision	SUB-R3	Oppose	A better outcome in these circumstances is to utilise the land more efficiently for rural residential use, adding much needed housing to Kerikeri in a way that does not impose any burden on the community in terms of providing or funding infrastructure.	delete Rule SUB-R3 or amend to provide greater subdivision opportunities without reference to minimum lot sizes and reduce the reach of the extensive matters of control
The BOI Watchdogs (S354)	S354.018	Subdivision	SUB-R3	Oppose	These types of matters should not place controls on dog ownership. Refer to full submission for details.	Delete reference to indigenous biodiversity in the matters of control (inferred)
Far North District Council (S368)	S368.098	Subdivision	SUB-R3	Support in part	Plan drafting improvement. It currently is not clear that SUB-R3 does not apply to multiunit development. Multi-unit development is addressed in SUB-R5. Add text to the heading for clarification.	Amend SUB-R3 rule title Subdivision of land to create a new allotment (excluding multi-unit

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						development)
Nigel Ross Surveyor Ltd (S373)	S373.001	Subdivision	SUB-R3	Oppose	There are many old titles that have never been subdivided in less developed areas, such as Hokianga. There are also legitimate reasons why a new title smaller than 8ha is required. These include a farming family wishing to dispose of a surplus dwelling, or to provide a building site for a family member, or to provide their own retirement home. A 4,000m2 site would normally be sufficient for these purposes. Subdividing a 8ha site, to avoid considerable costs incurred by a non-complying application, would surely conflict with the objectives of the zone by reducing the balance area of the farm unit.	Amend the rules SUB-S1 and SUB-R3 to allow a discretionary activity status for the creation of one new allotment from a title that has not been subdivided since 28 April 2000 in the Rural Production zone.
Kapiro Residents Association (S427)	S427.055	Subdivision	SUB-R3	Support in part	Many new subdivisions in Kerikeri and the surrounding rural area have greatly increased the volume of traffic using the central shopping/service area and roads leading to/from the CBD (e.g. Kerikeri Road, Waipapa Road, Landing Road, Kapiro Road, Purerua Road). When new developments are approved, insufficient account is taken of the total/cumulative impact of multiple developments on traffic. Other negative impacts on the community are not taken into account - such as such additional levels of noise, disruption and other changes that can affect people, amenity values and the character of the area.	Amend Rule SUB-R3 to include full consideration of cumulative/combined traffic effects, congestion, emissions, noise etc. in townships and roads, especially roads leading to/from a CBD or service centres [inferred].
John Andrew Riddell (S431)	S431.074	Subdivision	SUB-R3	Not Stated	Well designed subdivision is an important component of achieving sustainable use and development of natural and physical resources, and in establishing and continuing character and sense of place. There is an inappropriate emphasis on ensuring that vehicle requirements and needs are provided for in the subdivision rules. In urban areas and settlements and in their surrounds good resource management practice is for increased provision for cycling and other active transport and for walking access. Indeed this is a	Insert the following as further matters of control in all controlled activity subdivision rules and as further matters of discretion in all restricted discretionary activity subdivision rules: <ul style="list-style-type: none"> consistency with the scale, density, design and character of the

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					necessary measure to help mitigate and adapt to the effects of climate change.	<p>environment and purpose of the zone</p> <ul style="list-style-type: none"> • measures to mitigate and adapt to climate change • where relevant, measures to provide for active transport, protected cycleways and for walking
Kapiro Conservation Trust (S445)	S445.010	Subdivision	SUB-R3	Support	<p>Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.</p> <p>In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section):</p> <ul style="list-style-type: none"> - 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3) - 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3) 	Retain SUB-S8 in rule SUB-R3
Waiaua Bay Farm	S463.047	Subdivision	SUB-R3	Oppose	WBF opposes a non-complying activity status for subdivision that creates a lot around land in the	Amend the rules to clarify the activity status for subdivision

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Limited (S463)					NOSZ but does not divide the land within the NOSZ. A non-complying activity status to create a lot around the Natural Heritage subzone (which will, according to the Kauri Cliffs s32 report, default to rules for the NOSZ), appears unduly onerous for a subdivision that seeks to enclose and thereby protect, land in the Natural Heritage subzone/NOSZ.	(including boundary adjustments) that creates boundaries around but does not create boundaries through, land in the NOSZ. (See also WBF's submission on rule SUB-R1 (submission point S463.046)).
Waiaua Bay Farm Limited (S463)	S463.048	Subdivision	SUB-R3	Not Stated	A mainly low density outcome continues to be the preferred approach for future subdivision in the Golf Living subzone at Kauri Cliffs. However, WBF seeks flexibility from the Proposed Plan to deliver a range of lots, including lots of greater than 0.4 ha. This will enable (a limited number of) other dwelling types to be delivered alongside the large lot/detached dwelling format that the current rule requires. WBF considers that enabling some variety of housing typologies is appropriate as it is likely to support better social/community outcomes for future residents. Enabling some increased density in appropriate areas will also likely assist to limit potential landscape and natural character effects compared to a more widely dispersed pattern of residential development (i.e., all 60 lots being at least 0.4 ha). Initial discussions with mana whenua also revealed a preference for some clustered lot arrangements rather than a strictly low density arrangement for all 60 lots.	Amend RDIS-2 of Rule SUB-R3 as follows: 1. Subdivision of up to 60 new lots for residential (golf living) purposes activities, provided that: i. no lot is less than 4,0500 m ² in area; ii. At least 30 lots are larger than 4,000 m²; iii. ... iv. ... Matters of discretion are restricted to: a. ... b. ... c.... d. Measures to manage any adverse the effects on adjoining activities on adjoining land in separate ownership...
Tupou Limited (S487)	S487.004	Subdivision	SUB-R3	Support in part	At least for the Rural Production Zone the word 'Net' should be added to the beginning of clause e. That is, 'Net adverse effects ...' This would align with IB-P10 which uses 'positive contribution'. Adopting this strategy will tend to encourage plantings of native species and	Amend SUB-R3 e, as follows: Net adverse effects on areas with historic heritage and cultural values, natural features and

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					biodiversity rather than generating a perverse disincentive.	landscapes, wetland, lake and river margins, natural character or indigenous biodiversity values including indigenous taxa that are listed as threatened or at risk in the New Zealand Threat Classification system lists;
Fieldco Limited (S488)	S488.001	Subdivision	SUB-R3	Support	Provision needs to be maintained for rural amenity lots which can allow the subdivision of an existing dwelling off a farm property, with a small parcel of land i.e. 4,000m.	Retain [SUB-R3] for provision of small rural amenity lots, where they relate to existing dwellings or buildings. This will preserve the rural production aspect of farmland, while allowing for dwellings to be treated as different when included in a farm property.
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)	S523.007	Subdivision	SUB-R3	Support	<p>Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.</p> <p>In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section):</p> <p>- 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3)</p>	Retain SUB-R3

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					- 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3)	
Carbon Neutral NZ Trust (S529)	S529.062	Subdivision	SUB-R3	Support in part	Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more. PDP provisions that normally require esplanade reserves when consenting land use and other forms of development. Improve provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values.	Amend SUB-R3 to insert SUB-S8
Kāinga Ora Homes and Communities (S561)	S561.047	Subdivision	SUB-R3	Support	SUB-R3 ensures the necessary infrastructure is provided when creating any new allotments.	Amend SUB-R3 as follows: Insert a Medium density Residential zone Delete the NOTE: If a resource consent application is made under this rule on land that is within 500m of the airport zone, the airport operator will likely be considered an affected person for any activity where the adverse effects are considered to be minor or more than minor.
Terra Group (S172)	S172.006	Subdivision	SUB-R4	Support	Support this rule, specifically CON-1 and CON-2 as the rules will help to achieve positive outcomes for the proposed zone.	Retain as notified (inferred)

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Haigh Workman Limited (S215)	S215.027	Subdivision	SUB-R4	Support in part	The Controlled Activity subdivision rules do not appear to require compliance with the Transport section of the Plan. As subdivision is one area where access is critical, the Transport rules should apply to subdivisions.	Amend SUB-R4 to require compliance with Transport rules in the Plan for a subdivision to be a Controlled Activity.
Kapiro Residents Association (S427)	S427.056	Subdivision	SUB-R4	Support in part	Many new subdivisions in Kerikeri and the surrounding rural area have greatly increased the volume of traffic using the central shopping/service area and roads leading to/from the CBD (e.g. Kerikeri Road, Waipapa Road, Landing Road, Kapiro Road, Purerua Road). When new developments are approved, insufficient account is taken of the total/cumulative impact of multiple developments on traffic. Other negative impacts on the community are not taken into account - such as such additional levels of noise, disruption and other changes that can affect people, amenity values and the character of the area.	Amend Rule SUB-R4 to include full consideration of cumulative/combined traffic effects, congestion, emissions, noise etc. in townships and roads, especially roads leading to/from a CBD or service centres [inferred].
John Andrew Riddell (S431)	S431.075	Subdivision	SUB-R4	Not Stated	Well designed subdivision is an important component of achieving sustainable use and development of natural and physical resources, and in establishing and continuing character and sense of place. There is an inappropriate emphasis on ensuring that vehicle requirements and needs are provided for in the subdivision rules. In urban areas and settlements and in their surrounds good resource management practice is for increased provision for cycling and other active transport and for walking access. Indeed this is a necessary measure to help mitigate and adapt to the effects of climate change.	Insert the following as further matters of control in all controlled activity subdivision rules and as further matters of discretion in all restricted discretionary activity subdivision rules: <ul style="list-style-type: none"> • consistency with the scale, density, design and character of the environment and purpose of the zone • measures to mitigate and adapt to climate change • where relevant, measures to provide for active transport,

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						protected cycleways and for walking
Kairos Connection Trust and Habitat for Humanity Northern Region Ltd (S138)	S138.009	Subdivision	SUB-R5	Support in part	Delete reference to compliance with the SUB-S1 'minimum allotment size' as the nature of a multi-unit development would be a unit density of 1 per 200m ² and could not therefore meet the 'Controlled Activity' status for a subdivision of the units already approved by way of a land use consent. The retention of this rule as proposed to be worded would mean that all subdivision applications based on the multi-unit development provision would be discretionary. As a comprehensive development proposal, Council is proposing to restrict its discretion to matters such as effects on neighbourhood character, residential amenity and the surrounding residential area resulting from both external impacts beyond the boundary of the site and internal amenity including parking, access and outdoor living space, which would address the matters set out in the proposed subdivision control standard SUB-R5(a).	Amend Rule SUB-R5 CON-2 to delete the reference to ' <i>SUB-S1 minimum allotment sizes controlled activity</i> '
Haigh Workman Limited (S215)	S215.028	Subdivision	SUB-R5	Support	The Controlled Activity subdivision rules do not appear to require compliance with the Transport section of the Plan. As subdivision is one area where access is critical, the Transport rules should apply to subdivisions.	Amend SUB-R5 to Require compliance with Transport rules in the Plan for a subdivision to be a Controlled Activity.
Our Kerikeri Community Charitable Trust (S272)	S272.008	Subdivision	SUB-R5	Support in part	Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more. PDP provisions that normally require esplanade reserves when consenting land use and other forms of development. Improve provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat	Retain SUB-R5 including reference to SUB-S8

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Classification System and areas with significant ecological values.	
Waka Kotahi NZ Transport Agency (S356)	S356.089	Subdivision	SUB-R5	Oppose	<p>There appear to be no rules or assessment criteria that manage access or transport effects, i.e. safe and fit for purpose access, network impacts, and the provision of transport infrastructure. This is a fundamental control of subdivision.</p> <p>This is critical for subdivision on the State highway network given the high-speed environment. Waka Kotahi has its own access design standards, and seeks to minimise side friction, thereby consolidating vehicle crossings and encouraging access from a local road where possible. There should also be circumstances in which active mode connections are provided for, and consideration of how this may link to public transport infrastructure where practicable.</p>	Insert rules and assessment criteria relating to the provision and management of access and transport effects of subdivision.
John Andrew Riddell (S431)	S431.076	Subdivision	SUB-R5	Not Stated	<p>Well designed subdivision is an important component of achieving sustainable use and development of natural and physical resources, and in establishing and continuing character and sense of place.</p> <p>There is an inappropriate emphasis on ensuring that vehicle requirements and needs are provided for in the subdivision rules. In urban areas and settlements and in their surrounds good resource management practice is for increased provision for cycling and other active transport and for walking access. Indeed this is a necessary measure to help mitigate and adapt to the effects of climate change.</p>	<p>Insert the following as further matters of control in all controlled activity subdivision rules and as further matters of discretion in all restricted discretionary activity subdivision rules:</p> <ul style="list-style-type: none"> • consistency with the scale, density, design and character of the environment and purpose of the zone • measures to mitigate and adapt to climate change • where relevant, measures to provide for active transport, protected cycleways and for walking

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Kapiro Conservation Trust (S445)	S445.011	Subdivision	SUB-R5	Support	<p>Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.</p> <p>In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section):</p> <ul style="list-style-type: none"> - 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3) - 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3) 	Retain SUB-S8 in rule SUB-R5
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)	S523.008	Subdivision	SUB-R5	Support	<p>Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.</p> <p>In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach</p>	Retain SUB-R5

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>section):</p> <ul style="list-style-type: none"> - 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3) - 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3) 	
Carbon Neutral NZ Trust (S529)	S529.063	Subdivision	SUB-R5	Support	<p>Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision.</p> <p>PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more.</p> <p>PDP provisions that normally require esplanade reserves when consenting land use and other forms of development.</p> <p>Improve provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values.</p>	Retain SUB-R5 which includes SUB-S8
Kāinga Ora Homes and Communities (S561)	S561.048	Subdivision	SUB-R5	Support in part	<p>This rule provides for the subdivision of an approved landuse development, enabling separate titles where required. However Kāinga Ora consider it is unnecessary to use the term multi-unit and an amendment is suggested to apply this rule to an approved residential landuse consent . Further, to support a medium density residential zone around Kerikeri township, Rule SUB-R5 needs to be amended to include the rule application to the new proposed Medium density Residential zone.</p>	<p>Amend SUB - R5 rule heading as follows: Subdivision around an approved multi-unit landuse development</p> <p>Amend the application of this rule by reference to the Medium Density Residential zone.</p>
Des and Lorraine Morrison (S44)	S44.002	Subdivision	SUB-R6	Oppose	<p>While a potential alternative may be to amend the environmental benefit subdivision rule (SUB-R6) to allow one additional lot for every 1 ha of significant vegetation or significant indigenous</p>	<p>Amend the environmental benefit subdivision rule SUB-R6 if rezoning 19 and 24 James Street, and 34 and 36 Pukematu Lane, Russell, to</p>

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					habitat to be legally protected, where that lot is adjacent to a residential or open space zone in the coastal environment, this is a considerably inferior approach. It would potentially affect a larger number of areas, would constrain development to a form of limited residential use, and would not result in an efficient use of land or resources. If rezoning to Kororāreka zoning is not accepted, then amending this rule would result in some limited benefits over the current proposed Rural Production zoning.	Kororāreka zoning is not accepted.
Far North Real Estate 2010 Limited (S53)	S53.002	Subdivision	SUB-R6	Oppose	RDIS-3, RDIS-4 and RDIS-5 - the SNAs were gotten rid of 2-3 years ago and now Council is bringing them back in in a lot of areas that are just a puddle	Decision requested not clear
New Zealand Pork Industry Board (S55)	S55.021	Subdivision	SUB-R6	Support	Support the potential for reverse sensitivity effects as a matter of discretion.	Retain as proposed.
Lynley Newport (S116)	S116.001	Subdivision	SUB-R6	Support in part	Support initiative for environmental benefit subdivision and the starting category of activity (restricted discretionary). There should not be any discouragement to landowners wanting to utilise this rule, and yet making non achievement of with RDIS-6, RDIS-7 and RDIS-8 defaulting to non-complying activity status does just that. Believe non achievement of the RDIS requirements should only default to discretionary activity status.	Retain Rule SUB-R6, subject to the following amendments to activity status: <i>Activity status where compliance not achieved with RDIS -1, RDIS-2, RDIS-3, RDIS-4, and RDIS-5, RDIS-6, RDIS-7 and RDIS-8 is not achieved:</i> Discretionary Activity <i>status where compliance not achieved with RDIS-6, RDIS-7 and RDIS-8 is not achieved: Non-complying</i>

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Lynley Newport (S116)	S116.002	Subdivision	SUB-R6	Support in part	<p>Rule SUB-R6 gives no recognition to habitat already voluntarily legally protected by landowners, only looking to reward areas 'to be' protected. There is no justification for the distinction. If a landowner has already voluntarily legally protected land, not having done so through any consent process or requirement of the Council, but voluntarily doing so; and they have not previously received any 'bonus' through the current Operative District Plan, then why can't the same bonus lot(s) provision apply? If anything someone who has already been voluntarily legally protecting habitat for a number of years should receive more reward because they have been providing an environmental service for longer and the quality of the habitat will already be high.</p> <p>There is no ecologically based rationale for restricting the area to be protected to having to be a minimum of 4ha in area. QEII Open Space Covenants, for example, will often apply to areas less than 1ha in area. If QEII considers smaller habitat areas to be worthy of permanent legal protection, then the Council should acknowledge that habitat can be value, no matter its size.</p>	<p>Add as part of RDIS-2 <i>"Any area already legally protected must have been voluntarily protected by the landowner and not required by the Council has a condition of resource consent or previously used to obtain any bonus provision as provided for in any previous Operative District Plan"</i>.</p> <p>Under Table 1, in first column, amend heading to: <i>"Total area of significant indigenous vegetation or significant indigenous habitat to be legally protected on an individual Record of Title."</i></p> <p>Amend first row of Table 1 to read: <i>Greater than 4ha - less than Up to 10ha</i></p> <p>Amend RDIS-4 as follows: <i>The subdivision includes or proposes to protection all areas of indigenous vegetation, indigenous habitat or natural wetland by way of a conservation covenant pursuant to the Reserves Act 1977 or the</i></p>

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						Queen ElizabethII National Trust Act 1977.
Lynley Newport (S116)	S116.003	Subdivision	SUB-R6	Support in part	<p>There is no good logic in requiring any bonus lot to be a minimum size of 2ha. A bonus lot need not contain the area to be permanently and legally protected, it might be located in any other lot being created. It would be better to ensure that a bonus lot or lots is/are not so large as to have an impact on the use of productive land. Neither is there any logic in requiring the balance lot to be greater than 40ha as this immediately removes any incentive for anybody owning an existing property of less than 40ha to protect areas of habitat. This is totally counter-productive to the whole intent of this provision - to provide a positive incentive to protect habitat. The rule should make it clear that the protected area can be within either the nominated bonus lot or any other lot. The key is the protection of habitat regardless of the size of the lot that it is within. There can also be more than one area being protected and these may be on more than one lot.</p>	<p>Amend RDIS-6 as follows:</p> <ul style="list-style-type: none"> • <i>All proposed new environmental bonus (additional) allotments are to be a minimum size of 2ha in area and the balance lot must be greater than 40ha 4,000m².</i> • Amend the balance lot requirements - First preference is to delete any minimum lot requirement for the balance allotment; second preference if there must be a minimum size for any balance (which may include the area to be protected) is a 12ha minimum size. This provides for up to say 10ha of protected habitat within a 12ha property, plus one or two bonus lots. There are enough caveats in the remaining RDIS requirements to ensure the lots are capable

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						of supporting their intended use; to ensure protection of habitat; and to ensure protection of highly versatile soils.
Lynley Newport (S116)	S116.004	Subdivision	SUB-R6	Support in part	Why is this a one-off opportunity with no residual rights available? Subdivision isn't a one-off opportunity if the standards for minimum lot sizes can be achieved. There should be no reason why a landowner cannot come back for a second or third bonus lot at a later date just as a landowner can carry out more than one subdivision over time. Provided there is land and habitat that is still able to comply with the parameters, there should not be any reason they cannot create another legally protected area and get a bonus lot.	Amend RDIS-7 as follows <i>This rule has not been used previously to gain an additional subdivision entitlement</i> Where the full rights for bonus lot(s) as specified in Tables 1 and 2 have not been utilised, the landowner can apply again to use up the available allowance OR As a second preference and as already stated in submission, make the inability to comply with RDIS-7 as currently written, a discretionary activity. This would mean a landowner could come back for a second application but as a discretionary activity rather than restricted discretionary.
NFS Farms Limited (S151)	S151.005	Subdivision	SUB-R6	Oppose	This rule will result in loss of high value (ecological and landscape value) watercourses, wetlands and indigenous vegetation on smaller sites across the district, and fails to recognise the potential for protection and enhancement of these natural assets. There are few if any	Delete the minimum balance lot size requirement for 40 ha for Environmental Benefit Subdivision (RDIS-6), or significantly reduce the minimum balance lot size area.

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					landholdings in the immediate area of the submitters land (123 Rangitane Road, Kerikeri 0294 (Lot 3 DP 184505) and 127 Rangitane road, Kerikeri 0294 (Lots 1 and 3 DP 502469)) that are of a size that will unlock the potential to protect and enhance natural wetlands, streams and indigenous vegetation under the rule as proposed because the minimum balance lot area cannot be achieved. This results in missed opportunities for these values to be protected (on smaller land parcels) and is inconsistent with the NPS-FM and NES-F.	
Bentzen Farm Limited (S167)	S167.057	Subdivision	SUB-R6	Support in part	<p>The rule appropriately recognises that that limited rural lifestyle subdivision may be a sustainable use of land resources. RDIS-3 which requires the protected area to be added to the list of scheduled Significant Natural Areas in the District Plan cannot be met as a standard, unless by private plan change: the burden of which is significant and would negate the effectiveness of the rule.</p> <p>The council is able to capture such areas in its own plan changes, without risk of interim adverse impacts on such areas due to the obligation under the rule that they be legally protected.</p> <p>The balance lot requirement of 40ha is unnecessary and will negate the effectiveness of the rule on smaller sites which may have equal or better ecological values worthy of protection.</p>	Amend Rule SUB-R6 by: 1. Deleting RDIS-3; and 2. Amending RDIS-6 as follows: All proposed new environmental allotments are to be a minimum size of 2ha in area and the balance lot must be greater than 40ha.
Setar Thirty Six Limited (S168)	S168.058	Subdivision	SUB-R6	Support in part	<p>The rule appropriately recognises that that limited rural lifestyle subdivision may be a sustainable use of land resources, particularly where they are degraded and unsuited to productive use and significant environmental gains can be made. In these circumstances, subdivision, through an injection of capital and introduction of a 'community of care' and legal protection/going obligations, allows for restoration and enhancement opportunities to be implemented and maintained in perpetuity.</p>	Amend Rule SUB-R6 by: 1. Deleting RDIS-3; and 2. Amending RDIS-6 as follows: All proposed new environmental allotments are to be a minimum size of 2ha in area and the balance lot must be greater than 40ha.

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					<p>RDIS-3 which requires the protected area to be added to the list of scheduled Significant Natural Areas in the District Plan cannot be met as a standard, unless by private plan change: the burden of which is significant and would negate the effectiveness of the rule. The council is able to capture such areas in its own plan changes, without risk of interim adverse impacts on such areas due to the obligation under the rule that they be legally protected.</p> <p>The balance lot requirement of 40ha is unnecessary and will negate the effectiveness of the rule on smaller sites which may have equal or better ecological values worthy of protection.</p>	
The Shooting Box Limited (S187)	S187.050	Subdivision	SUB-R6	Support in part	<p>The balance lot requirement of 40ha is unnecessary and will negate the effectiveness of the rule on smaller sites which may have equal or better ecological values worthy of protection.</p>	<p>Amend Rule SUB-R6 by:</p> <ol style="list-style-type: none"> 1. Deleting RDIS-3; and 2. Amending RDIS-6 as follows: All proposed new environmental allotments are to be a minimum size of 2ha in area and the balance lot lot must be greater than 40ha.
Thomson Survey Limited (S203)	S203.001	Subdivision	SUB-R6	Support in part	<p>I support this initiative and the starting category of activity (restricted discretionary). However, I can only call it a "good start" and have several reservations and strong suggestions.</p> <ul style="list-style-type: none"> - The rule gives no recognition to habitat already voluntarily legally protected by landowners, only looking to reward areas 'to be' protected. There is no justification for the distinction. If a landowner has already voluntarily legally protected land, not having done so through any consent process or requirement of the Council, but voluntarily doing so; and they have not previously received any 'bonus' through the current Operative District Plan, then why can't the same bonus lot(s) provision apply? If anything someone who has already been voluntarily legally protecting habitat for a number of years should receive more reward because they have been providing an environmental 	<p>Amend SUB- R6 as follows</p> <p>Under Activity Status, replace with: "Activity status where compliance not achieved with RDIS-1 through RDIS-8 is Discretionary" and Delete "Activity status where compliance not achieved with RDIS-6, RDIS-7 and RDIS-8 is not achieved: Non-complying.</p> <p>Under Table 1, in first column, amend heading to: "Total area of significant indigenous vegetation or significant indigenous</p>

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					<p>service for longer and the quality of the habitat will already be high.</p> <ul style="list-style-type: none"> - There is no ecologically based rationale for restricting the area to be protected to having to be a minimum of 4ha in area. QEII Open Space Covenants, for example, will often apply to areas less than 1ha in area. If QEII considers smaller habitat areas to be worthy of permanent legal protection, then the Council should acknowledge that habitat can be valuable, no matter its size. - There is no good logic in requiring any bonus lot to be a minimum size of 2ha. A bonus lot need not contain the area to be permanently and legally protected, it might be located in any other lot being created. It would be better to ensure that a bonus lot or lots is/are not so large as to have an impact on the use of productive land. - Neither is there any logic in requiring the balance lot to be greater than 40ha as this immediately removes any incentive for anybody owning an existing property of less than 40ha to protect areas of habitat. This is totally counterproductive to the whole intent of this provision - to provide a positive incentive to protect habitat. - There should not be any discouragement to landowners wanting to utilise this rule, and yet making non- achievement of with RDIS-6, RDIS-7 and RDIS-8 defaulting to non-complying activity status does just that. I believe non-achievement of of the ROIS requirements should only default to discretionary activity status. - The rule should make it clear that the protected area can be within either the nominated bonus lot or any other lot. The key is the protection of habitat regardless of the size of the lot that it is within. There can also be more than one area being protected and these may be on more than one lot. - Why is this a one-off opportunity with no residual rights available? Subdivision isn't a one- 	<p>habitat to be legally protected on an individual Record of Title." {delete the words "to be"}. Add as part of RDIS-2 "Any area already legally protected must have been voluntarily protected by the landowner and not required by the Council as a condition of resource consent or previously used to obtain any bonus provision as provided for in any previous Operative District Plan".</p> <p>Amend first row of Table 1 to read: "up to 10ha" - {delete minimum size requirement of 4ha). Amend RDIS-4 as follows: "The subdivision includes or proposes protection by way of a conservation covenant pursuant to the Reserves Act 1977 or the Queen Elizabeth II National Trust Act 1977". Amend RDIS-6 to read: "All proposed new environmental bonus (additional) allotments are to be a minimum size of 4,000m²". Balance lot: First preference is to delete any minimum lot requirement for the balance</p>

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					<p>off opportunity if the standards for minimum lot sizes can be achieved. There should be no reason why a landowner cannot come back for a second or third bonus lot at a later date just as a landowner can carry out more than one subdivision over time. Provided there is land and habitat that is still able to comply with the parameters, there should not be any reason they cannot create another legally protected area and get a bonus lot.</p>	<p>allotment; second preference if there must be a minimum size for any balance (which may include the area to be protected) is a 12ha minimum size. This provides for up to say 10ha of protected habitat within a 12ha property, plus one or two bonus lots. There are enough caveats in the remaining ROIS requirements to ensure the lots are capable of supporting their intended use; to ensure protection of habitat; and to ensure protection of highly versatile soils.</p> <p>Either Amend RDIS-7 to read: "Where the full rights for bonus lot(s) as specified in Tables 1 & 2 have not been utilised, the land owner can apply again to use up the available allowance." Or as a second preference and as already stated above, make the inability to comply with RDIS-7 as currently written, a discretionary activity. This would mean a landowner could come back for a second application but as a discretionary activity rather than restricted discretionary.</p>

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Haigh Workman Limited (S215)	S215.029	Subdivision	SUB-R6	Support in part	The Controlled Activity subdivision rules do not appear to require compliance with the Transport section of the Plan. As subdivision is one area where access is critical, the Transport rules should apply to subdivisions.	Amend SUB-R6 Require compliance with Transport rules in the Plan for a subdivision to be a Controlled Activity.
Matauri Trustee Limited (S243)	S243.075	Subdivision	SUB-R6	Support in part	The rule appropriately recognises that that limited rural lifestyle subdivision may be a sustainable use of land resources, particularly where they are degraded and unsuited to productive use and significant environmental gains can be made. In these circumstances, subdivision, through an injection of capital and introduction of a 'community of care' and legal protection/going obligations, allows for restoration and enhancement opportunities to be implemented and maintained in perpetuity. RDIS-3 which requires the protected area to be added to the list of scheduled Significant Natural Areas in the District Plan cannot be met as a standard, unless by private plan change: the burden of which is significant and would negate the effectiveness of the rule. The council is able to capture such areas in its own plan changes, without risk of interim adverse impacts on such areas due to the obligation under the rule that they be legally protected. The balance lot requirement of 40ha is unnecessary and will negate the effectiveness of the rule on smaller sites which may have equal or better ecological values worthy of protection	Amend Rule SUB-R6 by: 1. Deleting RDIS-3; and 2. Amending RDIS-6 as follows: All proposed new environmental allotments are to be a minimum size of 2ha in area and the balance lot must be greater than 40ha.
Willowridge Developments Limited (S250)	S250.010	Subdivision	SUB-R6	Support in part	Willowridge support the inclusion of an environmental benefit subdivision (EBS) in the PDP. There is no ecological assessment to confirm that an environmental benefit would be achieved by those thresholds or in fact whether the number of allotments proposed would achieve an appropriate level of environmental benefit. The environmental outcomes could be improved	Review and amend the EBS provisions to achieve the following (or relief to the same or similar effect): <ul style="list-style-type: none"> Confirm the environmental benefit of enabling greater subdivision opportunities through the protection of

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					with a provision that promotes ecological enhancement and or restoration. The provisions do not promote the protection of other natural resources such as heritage resources, cultural heritage resources, ONL's or ONF's that could also be considered to achieve net public benefits where permanent protection is achieved through subdivision.	<p>indigenous biodiversity with evidence prepared by an ecologist;</p> <ul style="list-style-type: none"> • Provide for EBS where ecological enhancement and restoration is provided for; • Include EBS provisions for the protection of other natural environment and physical resources that are identified as being nationally important in accordance with section 6 of the RMA.
IDF Developments Limited (S253)	S253.009	Subdivision	SUB-R6	Support in part	<p>The general tenor of Rule SUB-R6 draws upon provisions found within the ODP. Some of those provisions have worked well and should be enhanced within the PDP.</p> <p>Table 1 and Table 2 should allow for the creation of covenant areas held in the ownership of various lots, with the environmental benefit lots distributed between those lots.</p> <p>Indeed, it may well be better management of a sites resource to have all the benefit lots on one lot rather than distributing these across a number of sites.</p> <p>These amendments give effect to attaining the purposes of the Act.</p>	<p>Retain Rule SUB-R6 subject to the following amendments;</p> <p>Amend Table 1 and Table 2 to allow for the area of vegetation or habitat and wetlands to be held in one Record of Title and the environmental lots distributed against the Record of Title which hold common ownership in the covenanted area.</p> <p>Amend RDIS-6 from 40ha to a 20ha balance area;</p>
Arahia Burkhardt Macrae (S255)	S255.002	Subdivision	SUB-R6	Support	<p>I support this rule as it rewards landowners who have existing protection for significant indigenous vegetation and wetlands, and it also incentivises landowners to protect same</p>	<p>Retain rule as notified</p>
Amber Hookway (S261)	S261.006	Subdivision	SUB-R6	Oppose	<p>Following protests by tangata whenua, farmers and other landowners who said the proposal to identify land as SNAs undermined their sovereignty and property rights, this opposition culminated in a large hikoi to the Council's Kaikohe headquarters where tangata whenua delivered a petition against the process.</p>	<p>Remove SNAs/wetlands from the District Plan and reinstate policy 13.4.6 from the Operative District Plan: That any subdivision proposal provides for the protection, restoration and</p>

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					Encouraging landowners to include identified Significant Natural Areas in Schedule 4 of the District Plan at the time of subdivision and development; implies this is voluntary when it clearly isn't.	enhancement of heritage resources, areas of significant indigenous vegetation and significant habitats of indigenous fauna, threatened species, the natural character of the coastal environment and riparian margins, and outstanding landscapes and natural features where appropriate.
Wilson Hookway (S264)	S264.006	Subdivision	SUB-R6	Oppose	Following protests by tangata whenua, farmers and other landowners who said the proposal to identify land as SNAs undermined their sovereignty and property rights, this opposition culminated in a large hikoi to the Council's Kaikohe headquarters where tangata whenua delivered a petition against the process. Encouraging landowners to include identified Significant Natural Areas in Schedule 4 of the District Plan at the time of subdivision and development; implies this is voluntary when it clearly isn't.	Remove SNAs/wetlands from the District Plan and instead reinstate policy 13.4.6 from the Operative District Plan: That any subdivision proposal provides for the protection, restoration and enhancement of heritage resources, areas of significant indigenous vegetation and significant habitats of indigenous fauna, threatened species, the natural character of the coastal environment and riparian margins, and outstanding landscapes and natural features where appropriate.
Our Kerikeri Community Charitable Trust (S272)	S272.009	Subdivision	SUB-R6	Support in part	Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more. PDP provisions that normally require esplanade	Retain SUB-R6 including reference to SUB-S8

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					reserves when consenting land use and other forms of development. Improve provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values.	
Russell Landcare Trust (S276)	S276.002	Subdivision	SUB-R6	Support in part	The guidance and rules for environmental benefit subdivision and management plan subdivision are inadequate to ensure that the purpose of the Act will be achieved.	Amend rule to provide definitions and criteria that must be met to qualify for an environmental benefit. Revise the rules so that: all of the ecological feature is protected, the ecological significance of the feature is considered, any additional lots have a suitable house site at least 20m away from any protected ecological feature or greater (e.g. in accordance with the NES-F), provides more details on the required content and objectives of an ecological management plan (including how the management actions will be monitored and reported on), sprawlign or sporadic subdivision and development is avoided, and natural character is protected and preserved. Also refer to comments on Draft Plan attached to submission.
Manu Burkhardt Macrae (S279)	S279.003	Subdivision	SUB-R6	Support	This rule is supported as it has the potential to reward landowners who have retained and protected indigenous vegetation and wetlands and incentivise landowners to do so.	Retain rule in its entirety.
Matthew Otway (S290)	S290.001	Subdivision	SUB-R6	Oppose	The 2ha minimum size is not realistic in many locations and is too big for many owners to manage. There are significant areas with marginal production land covered in invasive species which should be subdividable so that they can be managed to control invasive species spreading onto productive land.	Amend minimum size in RDIS-6 from 2ha to 1ha.

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P S Yates Family Trust (S333)	S333.050	Subdivision	SUB-R6	Support in part	<p>The rule appropriately recognises that that limited rural lifestyle subdivision may be a sustainable use of land resources, particularly where they are degraded and unsuited to productive use and significant environmental gains can be made. In these circumstances, subdivision, through an injection of capital and introduction of a 'community of care' and legal protection/going obligations, allows for restoration and enhancement opportunities to be implemented and maintained in perpetuity. RDIS-3 which requires the protected area to be added to the list of scheduled Significant Natural Areas in the District Plan cannot be met as a standard, unless by private plan change: the burden of which is significant and would negate the effectiveness of the rule. The council is able to capture such areas in its own plan changes, without risk of interim adverse impacts on such areas due to the obligation under the rule that they be legally protected.</p> <p>The balance lot requirement of 40ha is unnecessary and will negate the effectiveness of the rule on smaller sites which may have equal or better ecological values worthy of protection.</p>	Amend Rule SUB-R6 by: 1. Deleting RDIS-3; and 2. Amending RDIS-6 as follows: All proposed new environmental allotments are to be a minimum size of 2ha in area and the balance lot must be greater than 40ha.
Neil Construction Limited (S349)	S349.015	Subdivision	SUB-R6	Oppose	<p>A better outcome in these circumstances is to utilise the land more efficiently for rural residential use, adding much needed housing to Kerikeri in a way that does not impose any burden on the community in terms of providing or funding infrastructure.</p>	amend SUB-R6 to enable additional lots through 'environmental benefit subdivision' and also apply the rule to the Rural Lifestyle Zone
Waka Kotahi NZ Transport Agency (S356)	S356.090	Subdivision	SUB-R6	Oppose	<p>There appear to be no rules or assessment criteria that manage access or transport effects, i.e. safe and fit for purpose access, network impacts, and the provision of transport infrastructure. This is a fundamental control of subdivision.</p> <p>This is critical for subdivision on the State highway network given the high-speed environment. Waka Kotahi has its own access design standards, and seeks to minimise side friction, thereby consolidating vehicle crossings</p>	Insert rules and assessment criteria relating to the provision and management of access and transport effects of subdivision.

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					and encouraging access from a local road where possible. There should also be circumstances in which active mode connections are provided for, and consideration of how this may link to public transport infrastructure where practicable	
Leah Frieling (S358)	S358.033	Subdivision	SUB-R6	Support	Support the development bonus provisions for allow for smaller lot sizes in the rural production zone for any subdivision that provides protection of indigenous vegetation	Retain Rule SUB-R6
Northland Regional Council (S359)	S359.026	Subdivision	SUB-R6	Support in part	Areas of erosion prone land could also be considered as an environmental benefit where these areas are retired from production and appropriate measures taken to stabilise them. Such an approach would complement NRC soil conservation efforts to reduce sediment loads to fresh and coastal waters.	Amend Rule SUB-R6 to provide an environmental benefit where erosion prone land is retired from production and appropriate measures are taken to stabilise the land.
Director-General of Conservation (Department of Conservation) (S364)	S364.055	Subdivision	SUB-R6	Oppose	The Director-General considers the word "significant" should be removed from RDIS-2 of Rule SUB-R6. The vegetation that should be assessed by the ecologist is any "indigenous vegetation". Currently, the wording implies that the ecologist only assesses the vegetation if it is already considered to be significant.	Amend Rule SUB-R6 as follows: RDIS-2 Each separate area of significant indigenous vegetation, significant indigenous habitat or natural wetland included in the proposal must be assessed by a suitably qualified and experienced ecologist as satisfying at least one criteria in Appendix 5 of the Northland RPS (Criteria for determining significance of indigenous biodiversity).
Sarah Ballantyne and Dean Agnew (S386)	S386.015	Subdivision	SUB-R6	Support in part	Ballantyne & Agnew support the inclusion of an environmental benefit subdivision (EBS). However, it is unclear how the identified thresholds in Table 1 have been established. Whilst this is mentioned in the section 32, there is no ecological assessment to confirm that an environmental benefit would be achieved by those thresholds or in fact whether a number ratio of allotments is appropriate. It is considered	That FNDC provide evidence (ecological assessment) to confirm that environmental benefit would be achieved by the thresholds in Table 1, or amend the thresholds in Table 1 as necessary to achieve an environment benefit. Amend the EBS provisions to include rules which enable

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					that this is required to understand whether these are appropriate. Further, it is considered that environmental outcomes could be improved with a provision that promotes ecological enhancement and or restoration. In addition to this, it is noted that there are no provisions for the protection of other section 6 matters, such as for the protection of an ONL, ONF or heritage resources. It is considered that there is an opportunity to incorporate a range of EBS provisions to protect these natural resources, that encourage the clustering of smaller allotments away from these significant resources.	subdivision when other section 6 matters are protected, such as for the protection of an ONL, ONF or heritage resource.
Northland Federated Farmers of New Zealand (S421)	S421.178	Subdivision	SUB-R6	Support in part	Federated Farmers supports the provision for benefit subdivision within the rural zones. However, it is essential that the rule allows for the creation of benefit lots under 4ha. There are positive benefits to be had from Council considering smaller areas for wetlands and biodiversity improvements for more significant or critical catchments. There are some areas around the district that may be more significant than others to protect. A blanket size approach does not target specific catchments or locations that will have more significant gains.	Amend RDIS-2 (inferred) of Rule SUB-R6 to allow for case-by-case approval for areas less than those listed in tables 1 and 2
Kapiro Residents Association (S427)	S427.057	Subdivision	SUB-R6	Support in part	Many new subdivisions in Kerikeri and the surrounding rural area have greatly increased the volume of traffic using the central shopping/service area and roads leading to/from the CBD (e.g. Kerikeri Road, Waipapa Road, Landing Road, Kapiro Road, Purerua Road). When new developments are approved, insufficient account is taken of the total/cumulative impact of multiple developments on traffic. Other negative impacts on the community are not taken into account - such as such additional levels of noise, disruption and other changes that can affect people, amenity values and the character of the area.	Amend Rule SUB-R6 to include full consideration of cumulative/combined traffic effects, congestion, emissions, noise etc. in townships and roads, especially roads leading to/from a CBD or service centres [inferred].
John Andrew	S431.077	Subdivision	SUB-R6	Not Stated	Well designed subdivision is an important component of achieving sustainable use and	Insert the following as further matters of control in all controlled

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Riddell (S431)					<p>development of natural and physical resources, and in establishing and continuing character and sense of place.</p> <p>There is an inappropriate emphasis on ensuring that vehicle requirements and needs are provided for in the subdivision rules. In urban areas and settlements and in their surrounds good resource management practice is for increased provision for cycling and other active transport and for walking access. Indeed this is a necessary measure to help mitigate and adapt to the effects of climate change.</p>	<p>activity subdivision rules and as further matters of discretion in all restricted discretionary activity subdivision rules:</p> <ul style="list-style-type: none"> • consistency with the scale, density, design and character of the environment and purpose of the zone • measures to mitigate and adapt to climate change • where relevant, measures to provide for active transport, protected cycleways and for walking
John Andrew Riddell (S431)	S431.086	Subdivision	SUB-R6	Not Stated	<p>The guidance and rules relating to environment benefit subdivision and management plan subdivision are inadequate to ensure that the purpose of the Act will be achieved.</p>	<p>Amend Rule SUB-R6, environmental benefit, and its supporting policies to ensure that</p> <ul style="list-style-type: none"> ◦ all of the ecological feature is protected, ◦ the ecological significance of the feature is considered, ◦ any additional lots have a suitable house site at least 20 metres away from any protected ecological feature, ◦ more details are provided on the required content and objectives of an ecological management plan (including how the management actions will be monitored and reported on), ◦ sprawling or sporadic subdivision and development is avoided, and

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						◦ natural character is protected and preserved.
Kapiro Conservation Trust (S445)	S445.012	Subdivision	SUB-R6	Support	<p>Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.</p> <p>In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section):</p> <ul style="list-style-type: none"> - 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3) - 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3) 	Retain SUB-S8 in rule SUB-R6
New Zealand Eco Farms Ltd (S456)	S456.003	Subdivision	SUB-R6	Support in part	<p>RDIS-6 requires a balance lot of over 40ha, or the activity status defaults to non-complying. Requiring such a large balance area will preclude many environmental benefit subdivisions, and opportunities will be lost for formal protection and enhancement of bush and wetland features. It is requested that the balance area requirement in RDIS-R6 be deleted. Furthermore, the 2ha minimum lot size in RDIS-6 is unnecessarily large, and should be reduced to 4,000m² to minimise the amount of land potentially taken out of rural production.</p>	amend SUB-R6 RDIS-6 should be reduced to encourage the protection of ecological features.

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LJ King Ltd (S464)	S464.013	Subdivision	SUB-R6	Support	I support the development bonus provisions for allow for smaller lot sizes in the rural production zone for any subdivision that provides protection of indigenous vegetation.	Retain SUB-R6 (inferred)
Michael Foy (S472)	S472.034	Subdivision	SUB-R6	Support	To for allow for smaller lot sizes in the rural production zone for any subdivision that provides protection of indigenous vegetation.	retain SUB R6 Environmental benefit subdivision
Top Energy Limited (S483)	S483.169	Subdivision	SUB-R6	Support	Top Energy supports the requirement for connection to electricity supply at the boundary of the site area of the allotment for the zones specified, but seeks that the requirement also apply to Rural Lifestyle and Quail Ridge given it is most cost effective and efficient to provide easements at time of subdivision design and install infrastructure at time of physical site construction. It should be made expressly clear that for other Zones, an easement to facilitate future connection must be provided at the time of subdivision. Such a requirement should be included as part of this rule.	Amend Rule SUB - S6 to include the following (or to same effect) applicable to all zones not specified in SUB - S6 Easements shall be provided to the boundary of the site area of the allotment to facilitate future connection.
Elbury Holdings (S485)	S485.014	Subdivision	SUB-R6	Support	I support the development bonus provisions for allow for smaller lot sizes in the rural production zone for any subdivision that provides protection of indigenous vegetation.	Retain SUB-R6 (inferred).
Northland Planning and Development 2020 Limited (S502)	S502.083	Subdivision	SUB-R6	Support in part	Sites seeking to utilize this option will be limited, as most farming allotments which have larger areas of bush or wetlands tend not to be within areas with as much development pressure. If an older couple is looking to retire from farming, generally they are not looking for a larger section as it becomes harder to manage and maintain. As such, we seek to reduce the 2ha requirement in RDIS-6 to 1ha. When looking to safeguard bush areas generally you seek to keep the areas of protected or covenanted bush within the balance allotment as items such as weed, and pest management are more readily undertaken at larger scales. Protected bush areas are generally only located within smaller allotments	Amend SUB-R6 Table 1. Total area of significant indigenous vegetation or significant indigenous habitat to be legally protected on an individual Record of Title - Greater than 4ha 1ha - less than 10 4ha - 1 Greater than 10 4ha - less than 20 8ha - 2 Greater than 8ha - less than

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					<p>as a way to make up minimum lot size requirements which is not an ideal situation. Within the district there are many sites between 20ha and 40ha with areas of bush and/or wetlands where as per above, the removal of the dwelling or a site for their children which is not within a productive area of the farm would result in minor effects given the scale. In protecting large areas of bush or wetlands there needs to be a commensurate benefit to the farmer. As such, we have offered a revised table for Councils consideration.</p>	<p>12ha - 3</p> <p>Greater than 20 12ha - 4</p> <p>Table 2. Total area of natural wetland to be legally protected on an individual Record of Title -</p> <p>Greater than 0.5 2ha (5,2000m2) - less than 1ha - 1</p> <p>RDIS-6 All proposed new environmental allotments are to be a minimum size of 1 2ha in area and the balance lot must be 20ha or greater than 40ha.</p>
Elbury Holdings (S519)	S519.014	Subdivision	SUB-R6	Support	I support the development bonus provisions for allow for smaller lot sizes in the rural production zone for any subdivision that provides protection of indigenous vegetation.	Retain SUB-R6 (inferred).
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)	S523.009	Subdivision	SUB-R6	Support	<p>Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development.</p> <p>In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations</p>	Retain SUB-R6

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					<p>within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section):</p> <ul style="list-style-type: none"> - 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3) - 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3) 	
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527)	S527.021	Subdivision	SUB-R6	Oppose	<p>SUB-P8 and SUB-R6 create a type of subdivision called 'Environmental benefit subdivision' as a restricted discretionary activity. This appears to be poorly conceived provision - the protection of SNAs should be an essential prerequisite for any rural subdivision to be approved, not a means of getting additional lots.</p>	Amend SUB-R6 to make protection of SNAs an essential prerequisite (inferred)
Carbon Neutral NZ Trust (S529)	S529.064	Subdivision	SUB-R6	Support	<p>Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more. PDP provisions that normally require esplanade reserves when consenting land use and other forms of development. Improve provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values.</p>	Retain SUB-R6 which includes reference to SUB-S8
Carbon Neutral NZ Trust (S529)	S529.146	Subdivision	SUB-R6	Oppose	<p>SUB-P8 and SUB-R6 create a type of subdivision called 'Environmental benefit subdivision' as a restricted discretionary activity. This appears to be poorly conceived provision - the protection of SNAs should</p>	Amend SUB-R6 - SNA protection should be an essential prerequisite for any rural subdivision to be approved, not a means of getting

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					be an essential prerequisite for any rural subdivision to be approved, not a means of getting additional lots.	additional lots.
Elbury Holdings (S541)	S541.037	Subdivision	SUB-R6	Support	I support the development bonus provisions for allow for smaller lot sizes in the rural production zone for any subdivision that provides protection of indigenous vegetation.	Retain SUB-R6 (inferred)
LJ King Limited (S543)	S543.013	Subdivision	SUB-R6	Support	I support the development bonus provisions for allow for smaller lot sizes in the rural production zone for any subdivision that provides protection of indigenous vegetation.	Retain SUB-R6 (inferred)
LJ King Limited (S547)	S547.013	Subdivision	SUB-R6	Support	I support the development bonus provisions for allow for smaller lot sizes in the rural production zone for any subdivision that provides protection of indigenous vegetation	Retain SUB-R6 (inferred)
Martin John Yuretich (S40)	S40.016	Subdivision	SUB-R7	Oppose	<p>The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone.</p> <p>The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision.</p> <p>With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.</p> <p>It is correct to protect rural productive potential, but this can be achieved without imposing a total restriction on rural lifestyle properties.</p>	<p>Amend allotment sizes, perhaps with a limited number of allotments of a minimum of 8000m² or 1ha, then 4ha generally after that.</p> <p>Smaller lot sizes should apply for properties (or parts thereof) that do not consist of highly productive land.</p> <p>Perhaps there should be more focus on the size of the balance parcel - subdividing off 4ha to leave a 10ha balance parcel does not protect productivity, while subdividing 1ha off a 200ha block has next to no effect, especially if the smaller block consists of bush.</p> <p>Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision.</p>
Joel Vieviorka (S41)	S41.016	Subdivision	SUB-R7	Oppose	<p>The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone.</p> <p>The reason given for this rule is to protect the</p>	Amend allotment sizes in the Rural Production zone, perhaps with a limited number of allotments with minimum areas of 8000m ² or 1ha, then 4ha generally after that.

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					<p>productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision.</p> <p>With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.</p> <p>It is correct to protect rural productive potential, but this can be achieved without imposing a total restriction on rural lifestyle properties.</p>	<p>Smaller lot sizes should apply for properties (or parts thereof) that do not consist of highly productive land.</p> <p>Perhaps there should be more focus on the size of the balance parcel - subdividing off 4ha to leave a 10ha balance parcel does not protect productivity, while subdividing 1ha off a 200ha block has next to no effect, especially if the smaller block consists of bush.</p> <p>Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision.</p>
NFS Farms Limited (S151)	S151.002	Subdivision	SUB-R7	Support	Enables integrated subdivision opportunities that complements sustainable environmental management, including the protection of natural character, landscape, amenity, heritage and cultural values.	Retain SUB-R7 (Management Plan Subdivision) as it relates to the Rural Production zone and the submitters landholdings (at 123 Rangitane Road, Kerikeri 0294 (Lot 3 DP 184505) and 127 Rangitane road, Kerikeri 0294 (Lots 1 and 3 DP 502469))
Bentzen Farm Limited (S167)	S167.058	Subdivision	SUB-R7	Support	The rule appropriately recognises that that limited rural lifestyle subdivision may be a sustainable use of land resources, particularly where they are degraded and unsuited to productive use and significant environmental gains can be made. In these circumstances, subdivision allows for restoration and enhancement opportunities to be implemented and maintained in perpetuity.	Retain Rule SUB-R7
Setar Thirty Six Limited (S168)	S168.059	Subdivision	SUB-R7	Support	The rule appropriately recognises that that limited rural lifestyle subdivision may be a sustainable use of land resources, particularly	Retain Rule SUB-R7

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					where they are degraded and unsuited to productive use and significant environmental gains can be made. In these circumstances, subdivision allows for restoration and enhancement opportunities to be implemented and maintained in perpetuity.	
The Shooting Box Limited (S187)	S187.051	Subdivision	SUB-R7	Support	The rule appropriately recognises that that limited rural lifestyle subdivision may be a sustainable use of land resources, particularly where they are degraded and unsuited to productive use and significant environmental gains can be made. In these circumstances, subdivision allows for restoration and enhancement opportunities to be implemented and maintained in perpetuity.	Retain Rule SUB-R7.
Matauri Trustee Limited (S243)	S243.076	Subdivision	SUB-R7	Support	The rule appropriately recognises that that limited rural lifestyle subdivision may be a sustainable use of land resources, particularly where they are degraded and unsuited to productive use and significant environmental gains can be made. In these circumstances, subdivision allows for restoration and enhancement opportunities to be implemented and maintained in perpetuity.	Retain Rule SUB-R7
IDF Developments Limited (S253)	S253.010	Subdivision	SUB-R7	Support	The general tenor of Rule SUB-R7 draws upon provisions found within the ODP. Those provisions have worked well and should be enhanced within the PDP as this gives effect to the purposes of the Act.	Retain Rule SUB-R7 (inferred)
P S Yates Family Trust (S333)	S333.051	Subdivision	SUB-R7	Support	The rule appropriately recognises that that limited rural lifestyle subdivision may be a sustainable use of land resources, particularly where they are degraded and unsuited to productive use and significant environmental gains can be made. In these circumstances, subdivision allows for restoration and enhancement opportunities to be implemented and maintained in perpetuity.	Retain Rule SUB-R7

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<p>Sapphire Surveyors Limited (S348)</p>	<p>S348.003</p>	<p>Subdivision</p>	<p>SUB-R7</p>	<p>Oppose</p>	<p>The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the Rural Production zone. The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision. With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.</p> <p>It is correct to protect rural productive potential, but this can be achieved without imposing a total restriction on rural lifestyle properties. Previously blocks down to 4000sqm were allowed under the Operative District Plan. Perhaps the new District Plan could reconsider allotment sizes, perhaps with a limited number of allotments of a minimum of 8000sqm or 1ha, then 4ha generally after that. Smaller lot sizes should apply for properties (or parts thereof) that do not consist of highly productive land. This would give effect to Policy SUB-P8.</p> <p>Perhaps there should be more focus on the size of the balance parcel - subdividing off 4ha to leave a 10ha balance parcel does not protect productivity, while subdividing 1ha off a 200ha block has next to no effect, especially if the smaller block consists of bush.</p> <p>This would provide vitality in rural areas, opportunities for farmers to develop their land, relief for urban services, continued local jobs, lifestyle blocks for those that want them, and all while still protecting the productive capacity of the land.</p>	<p>Amend Rule SUB-R7 to align with changes sought by submitter to Standard SUB-S1 as it relates to subdivision in the Rural Production zone</p>

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Neil Construction Limited (S349)	S349.016	Subdivision	SUB-R7	Oppose	A better outcome in these circumstances is to utilise the land more efficiently for rural residential use, adding much needed housing to Kerikeri in a way that does not impose any burden on the community in terms of providing or funding infrastructure.	amend SUB-R7 to provide for 'management plan subdivision' with average lot sizes of 3,000m2 in the Rural Lifestyle Zone as a restricted discretionary activity
Kapiro Residents Association (S427)	S427.058	Subdivision	SUB-R7	Support in part	Many new subdivisions in Kerikeri and the surrounding rural area have greatly increased the volume of traffic using the central shopping/service area and roads leading to/from the CBD (e.g. Kerikeri Road, Waipapa Road, Landing Road, Kapiro Road, Purerua Road). When new developments are approved, insufficient account is taken of the total/cumulative impact of multiple developments on traffic. Other negative impacts on the community are not taken into account - such as such additional levels of noise, disruption and other changes that can affect people, amenity values and the character of the area.	Amend Rule SUB-R7 to include full consideration of cumulative/combined traffic effects, congestion, emissions, noise etc. in townships and roads, especially roads leading to/from a CBD or service centres [inferred].
John Andrew Riddell (S431)	S431.087	Subdivision	SUB-R7	Not Stated	The guidance and rules relating to environment benefit subdivision and management plan subdivision are inadequate to ensure that the purpose of the Act will be achieved.	Amend DIS-1.1 of Rule SUB-R7 so that it sets out a 6ha average lot size for Rural Production zoned land which is also in the Coastal Environment overlay, and a 2ha average lots size for Rural Lifestyle zone land which is also in the Coastal Environment overlay.
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527)	S527.023	Subdivision	SUB-R7	Oppose	SUB-P9 and SUB-R7 encourage inappropriate subdivision in the rural production and lifestyle zones if the development achieves so-called environmental outcomes of the management plan subdivision rule. This provision is also poorly conceived. The management plan criteria proposed in Appendix 3 (APP3) are vague, low-reaching and don't set clear expectations for either developers, land owners, or planning officers. The proposed elements and criteria for Management Plans are less than we should expect for all subdivisions in today's world. We consider that management plan subdivisions, to	Amend management plan subdivision criteria to improve environmental outcomes (inferred)

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					date, have historically failed to achieve quality development or environmental outcomes. If the concept of management plan subdivision is retained, they criteria need to be greatly improved to provide superior environmental outcomes.	
Carbon Neutral NZ Trust (S529)	S529.148	Subdivision	SUB-R7	Oppose	SUB-P9 and SUB-R7 encourage inappropriate subdivision in the rural production and lifestyle zones if the development achieves so-called environmental outcomes of the management plan subdivision rule. This provision is also poorly conceived. The management plan criteria proposed in Appendix 3 (APP3) are vague, low-reaching and don't set clear expectations for either developers, land owners, or planning officers. The proposed elements and criteria for Management Plans are less than we should expect for all subdivisions in today's world. We consider that management plan subdivisions, to date, have historically failed to achieve quality development or environmental outcomes. If the concept of management plan subdivision is retained, they criteria need to be greatly improved to provide superior environmental outcomes.	Delete this rule SUB-R7 (inferred) If the concept of management plan subdivision is retained, the criteria need to be greatly improved to provide superior environmental outcomes.
Lynley Newport (S117)	S117.001	Subdivision	SUB-R8	Oppose	Rule SUB-R8 as written lacks clarity and could be interpreted as applying to the entire site. The words "proposed development area" are too vague. The amended wording will still require/enable assessment of build platforms and services in relation to areas of land instability.	Amend CON-1 of Rule SUB-R8 as follows: The proposed development area, including the building platforms and any area that is required for access and services associated with buildings, is are located wholly outside of any area on the site that is identified as being land susceptible to land instability.
Reuben Wright (S178)	S178.003	Subdivision	SUB-R8	Support in part	Rule SUB-R8 refers to 'Subdivision of a site containing land susceptible to land instability'. The definition of land instability in the Plan is	[Amend to delete SUB-R8] and alternatively Rule SUB-R2 could include a requirement to define a

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					very detailed and onerous and relies on information that will not be contained in the District Plan (ie. NZ Geology Web Map). All subdivisions are required to be assessed against Section 106 of the RMA which includes consideration of any significant risk of natural hazards. There does not appear to be a need to address land instability via a rule where it is addressed directly by statute.	suitable building site on each vacant lot by way of engineering report or certification to confirm stability.
Thomson Survey Limited (S204)	S204.001	Subdivision	SUB-R8	Oppose	The rule as written lacks clarity and could be interpreting as applying to the entire site.	Amend CON-1The p-Proposed building platforms and any area that is required for access and services associated with buildings are development area, including the building platform and any area that is required for access and services, is located wholly outside of any area on the site that is identified as being land susceptible to land instability.
John Andrew Riddell (S431)	S431.078	Subdivision	SUB-R8	Not Stated	Well designed subdivision is an important component of achieving sustainable use and development of natural and physical resources, and in establishing and continuing character and sense of place. There is an inappropriate emphasis on ensuring that vehicle requirements and needs are provided for in the subdivision rules. In urban areas and settlements and in their surrounds good resource management practice is for increased provision for cycling and other active transport and for walking access. Indeed this is a necessary measure to help mitigate and adapt to the effects of climate change.	Insert the following as further matters of control in all controlled activity subdivision rules and as further matters of discretion in all restricted discretionary activity subdivision rules: <ul style="list-style-type: none"> consistency with the scale, density, design and character of the environment and purpose of the zone

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						<ul style="list-style-type: none"> • measures to mitigate and adapt to climate change • where relevant, measures to provide for active transport, protected cycleways and for walking
<p>Northland Fish and Game Council (S436)</p>	<p>S436.031</p>	<p>Subdivision</p>	<p>SUB-R8</p>	<p>Support</p>	<p>The recreational values of waterbodies can be constrained by limited public access; therefore, it is important to provide such access. Rivers and streams in the Far North District support trout fisheries, and many wetlands support game bird hunting, but outside of urban areas there is relatively little legal public access to and along waterbodies. While unformed legal roads do provide some access to rivers, they often wander over farmland and it is not obvious where they lie. Once at the river, there are few esplanade reserves and strips, marginal strips, recreation and road reserves and so most riverbanks are in private ownership, potentially with ad medium filum rights.</p> <p>Fish and Game has a statutory obligation to maintain and enhance access to sports fisheries and game bird hunting areas. Public access to lakes, rivers and public spaces can be fragmented by the subdivision process if not carefully managed. The subdivision process itself however provides an opportunity to maintain public access and associated linkages. The recreation of esplanade reserves for example can provide for the protection of conservation values of riparian margins, maintenance of water quality and aquatic habitats and the enhancement of public access and recreational opportunities, including sports fish angling and game bird hunting.</p> <p>Section 6(d) of the RMA recognises that the</p>	<p>Retain policies and rules that:</p> <ul style="list-style-type: none"> • ensure that the plan maintains and enhances public access to and along wetlands, streams, lakes and rivers • provide for the creation and protection of esplanade reserves and strips as a permitted activity.

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					maintenance and enhancement of public access to and along the coastal marine area, lakes and rivers is a matter of national importance	
Fire and Emergency New Zealand (S512)	S512.031	Subdivision	SUB-R8	Support in part	Given Fire and Emergency's secondary function responding to natural hazard emergencies, Fire and Emergency support the approach of controlling development/subdivision in identified natural hazard areas. It is essential that emergency responders are able to access potential emergencies on these sites.	insert an additional matter of control/matter of discretion to SUB-R8 on having adequate access for emergency response to each lot created
Ngā Tai Ora - Public Health Northland (S516)	S516.056	Subdivision	SUB-R8	Not Stated	Ngā Tai Ora support the creation of resilient communities, responding to and managing risk from natural hazards to ensure the health, safety and wellbeing of Northland residents. Ngā Tai Ora consider that SUB-R8 is ineffective and inefficient. The rule requires building platforms, access and services to be located wholly outside of any area on site which is identified as land susceptible to land instability. Land susceptible to land instability is not mapped in the PDP, instead the PDP provides a complicated definition which requires applicants to undertake individual mapping of their own site. Ngā Tai Ora, consider that this method is onerous, placing considerable cost on landowners particularly when provisions of affordable, safe and healthy housing is essential in the Far North District.	Insert rules applying to areas of risk which are appropriately identified through further mapping of land instability and where the potential risk of land instability throughout the District is understood. Or alternatively: Amend the definition of land identified as susceptible to land instability, to be easily understandable and identifiable. Amend Rule SUB-R8 to locate building platforms, access and services in the least as risk portion of the parent site.
Far North District Council (S368)	S368.034	Subdivision	SUB-R9	Support in part	Spelling error: (except where the allotments are for roads, esplanades, accessways and infrastructure)	Amend SUB-R9 RDIS- 1 Proposed building platforms are identified for each allotment and located wholly outside of the National Grid Yard (except where the allotments are for roads, esplanades, accessways and infrastructure).

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Northland Federated Farmers of New Zealand (S421)	S421.179	Subdivision	SUB-R9	Support in part	Federated Farmers seeks recognition in rule SUB-R9 that subdivision within the rural production zone is different to that of other zones in respect of the effects on the national grid corridor. Many farmers in the rural production zone have areas of national grid running through and when subdividing their property into 40ha or 20ha allotments there is still substantial land available for both development and the national grid corridor.	Amend Rule SUB-R9 to provide for subdivision in the Rural Production zone as a controlled activity
John Andrew Riddell (S431)	S431.079	Subdivision	SUB-R9	Not Stated	Well designed subdivision is an important component of achieving sustainable use and development of natural and physical resources, and in establishing and continuing character and sense of place. There is an inappropriate emphasis on ensuring that vehicle requirements and needs are provided for in the subdivision rules. In urban areas and settlements and in their surrounds good resource management practice is for increased provision for cycling and other active transport and for walking access. Indeed this is a necessary measure to help mitigate and adapt to the effects of climate change.	Insert the following as further matters of control in all controlled activity subdivision rules and as further matters of discretion in all restricted discretionary activity subdivision rules: <ul style="list-style-type: none"> • consistency with the scale, density, design and character of the environment and purpose of the zone • measures to mitigate and adapt to climate change • where relevant, measures to provide for active transport, protected cycleways and for walking
Transpower New Zealand Ltd (S454)	S454.095	Subdivision	SUB-R9	Not Stated	Transpower supports the inclusion of this subdivision rule in the FNPDP as it gives effect to the NPSET but considers that the matters of discretion could be redrafted to provide improved clarity and certainty for the plan user.	Amend the title of the rule and replace the matters of discretion as follows: SUB-R9 Subdivision of a site within the National Subdivision Grid Corridor

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						<p>All zones</p> <p>...</p> <p>Matters over which discretion is restricted:a. The extent to which the subdivision allows for earthworks, buildings and structures to comply with the safe distance requirements of the New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001).b. The provision for the on-going efficient operation, maintenance, development and upgrade of the National Grid, including the ability for physical vehicle access to existing transmission lines and support structures for maintenance, inspections and upgrading.c. The extent to which potential adverse effects (including visual and reverse sensitivity effects) are mitigated through the location of building platforms.d. The extent to which the design and construction of the subdivision allows for activities to be setback from the National Grid to ensure adverse effects on, and from, the National Grid and on public safety and</p>

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						<p>property are appropriately avoided, remedied or mitigated, for example, through the location of roads and reserves under the transmission lines.e. The nature and location of any proposed vegetation to be planted within the National Grid Yard.f. The outcome of any consultation with, and technical advice from, Transpower.g. The extent to which the subdivision plan clearly identifies the National Grid and proposed building platforms.</p>
<p>Top Energy Limited (S483)</p>	<p>S483.167</p>	<p>Subdivision</p>	<p>SUB-R9</p>	<p>Support</p>	<p>Top Energy supports the protection of the National Grid from inappropriate development and considers that ensuring this at the time of subdivision is critical to the resilience of the wider network</p>	<p>Retain Rule SUB-R9</p>
<p>John Andrew Riddell (S431)</p>	<p>S431.080</p>	<p>Subdivision</p>	<p>SUB-R10</p>	<p>Not Stated</p>	<p>Well designed subdivision is an important component of achieving sustainable use and development of natural and physical resources, and in establishing and continuing character and sense of place. There is an inappropriate emphasis on ensuring that vehicle requirements and needs are provided for in the subdivision rules. In urban areas and settlements and in their surrounds good resource management practice is for increased provision for cycling and other active transport and for walking access. Indeed this is a necessary measure to help mitigate and adapt to the effects of climate change.</p>	<p>Insert the following as further matters of control in all controlled activity subdivision rules and as further matters of discretion in all restricted discretionary activity subdivision rules:</p> <ul style="list-style-type: none"> • consistency with the scale, density, design and character of the environment and purpose of the zone

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						<ul style="list-style-type: none"> • measures to mitigate and adapt to climate change • where relevant, measures to provide for active transport, protected cycleways and for walking
Top Energy Limited (S483)	S483.168	Subdivision	SUB-R10	Support	Top Energy supports the inclusion of a provision requiring the protection of the CELS. However Top Energy consider that the rule needs to be amended to be effective. Where compliance with this cannot be achieved, the activity should become non-complying as is the case for SUB-R9.	Amend the wording of Rule SUB - R10 to: SUB -R10 Subdivision of a site within 32m of the centre line of Critical Electricity Line Activity status: Restricted Discretionary Where:PER -1The proposed building platforms are identified outside of a 32m setback from the centre line of a CELActivity Status where not achieved: Non-complying
Lynley Newport (S115)	S115.001	Subdivision	SUB-R11	Oppose	Rule SUB-R11 is overly restrictive, not necessarily in its wording or activity status, but what it defaults to if RDIS-1 cannot be met. Given that there are a host of methods available to landowners to ensure they can remedy or mitigate the risk of material damage from flooding when building, I believe non-complying status to be overly restrictive and believe discretionary activity status to be adequate to enable the Council to assess for risk appropriately. The rule addresses the 1 in 100-year event - a 1% likelihood of occurring every year. It would seem to me that the Council should be more interested in assessing the suitability of subdivisions in regard to the 1 in 10-year event - where there is at least a 10%	Amend Rule SUB-R11 to be less restrictive by reserving the default to a non-complying activity status for the 1 in 10-year flood event and default to discretionary activity status for the 1 in 100-year flood event.

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					chance of flooding occurring every year - a higher risk of occurring. The rule does not accurately reflect the requirements of the Regional Policy Statement for Northland either. That document refers to a '100 year flood event' and a '10 year flood event' whereas the Proposed District Plan uses the terminology "spatial extent of the 1 in 100 year floodplain". The latter infers reliance to ascertain compliance with the rule is on maps regardless of whether a report is provided refuting the accuracy of those maps; whereas the former infers an ability for an assessment from a suitably qualified person to confirm compliance.	
Thomson Survey Ltd (S193)	S193.001	Subdivision	SUB-R11	Oppose	The rule is overly restrictive. There are a host of methods available to land owners to ensure they can remedy or mitigate the risk of material damage from flooding when building. Council should be more interested in assessing the suitability of subdivisions in regard to the 1 in 10 year event. The rule does not accurately reflect the requirements of the Regional Policy Statement for Northland.	Amend SUB-R11 to default to non-complying activity status for the 1 in 10 year flood event and default to discretionary activity status for the 1 in 100 year flood event.
Haigh Workman Limited (S215)	S215.031	Subdivision	SUB-R11	Support	We support subdivisions in natural hazard areas being much more restricted than subdivisions outside these areas. Subdivisions that result in development in flood hazard areas should be avoided.	Retain Restricted Discretionary and Non-Complying status for subdivisions in natural hazards areas.
Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd (S344)	S344.011	Subdivision	SUB-R11	Not Stated	As proposed, rule SUB-R11 is inefficient and ineffective. Coastal and flood hazard areas are mapped overlays, rules and constraints apply to the mapped location. These rules will result in any subdivision of any site containing a portion of identified coastal hazard as a restricted discretionary activity no matter what the potential risk is.	Amend SUB-R11 to provide for subdivision of land mapped as a coastal or flood hazard area as a restricted discretionary activity.
John Andrew	S431.081	Subdivision	SUB-R11	Not Stated	Well designed subdivision is an important component of achieving sustainable use and development of natural and physical resources,	Insert the following as further matters of control in all controlled activity subdivision rules and as

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Riddell (S431)					<p>and in establishing and continuing character and sense of place.</p> <p>There is an inappropriate emphasis on ensuring that vehicle requirements and needs are provided for in the subdivision rules. In urban areas and settlements and in their surrounds good resource management practice is for increased provision for cycling and other active transport and for walking access. Indeed this is a necessary measure to help mitigate and adapt to the effects of climate change.</p>	<p>further matters of discretion in all restricted discretionary activity subdivision rules:</p> <ul style="list-style-type: none"> • consistency with the scale, density, design and character of the environment and purpose of the zone • measures to mitigate and adapt to climate change • where relevant, measures to provide for active transport, protected cycleways and for walking
Northland Planning and Development 2020 Limited (S502)	S502.084	Subdivision	SUB-R11	Support in part	<p>The spatial extent of the 1:100 year flood plain refers to the mapped extent of a flood plain. In some cases river control works or earthworks consented by the regional council have been undertaken to ensure that a building platform can be established outside of this mapped flood hazard area. Where this is the case the proposal should also be able to achieve a Restricted Discretionary Activity status as opposed to being a Non-Complying activity. As such item 1 has been updated to reflect this scenario.</p>	<p>Amend SUB-R11 RDIS-1 RDIS -1</p> <p>1. Building platforms are located wholly outside the spatial extent of the 1 in 100 year floodplain, or a site specific report has been provided by a suitably qualified and experienced practitioner which confirms that the building platform is located outside of the 1 in 100 year floodplain:</p> <p>2. Newly created allotments must be located and designed to not divert flood flow onto other properties or otherwise result in any increase in flood</p>

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						hazard beyond the site; 3. Any private roads, right of ways or accessways must be located where the depth of flood waters in a 1 in 100 year flood event does not exceed 200mm above ground level.
Fire and Emergency New Zealand (S512)	S512.032	Subdivision	SUB-R11	Support in part	Given Fire and Emergency's secondary function responding to natural hazard emergencies, Fire and Emergency support the approach of controlling development/subdivision in identified natural hazard areas. It is essential that emergency responders are able to access potential emergencies on these sites.	Include an additional matter of control/matter of discretion to SUB-R11 on having adequate access for emergency response to each lot created.
Kāinga Ora Homes and Communities (S561)	S561.049	Subdivision	SUB-R11	Support	Rule SUB-R11 is part of the natural hazard framework contained within the Proposed Plan ensuring land unsuitable for development is removed from development potential.	Retain Rule SUB-R11 as notified.
Bayswater Inn Ltd (S29)	S29.006	Subdivision	SUB-R12	Oppose	Subdivision of 40 Marsden Road, Paihia, would be assessed as a restricted discretionary activity but the building platform and access must be outside the Coastal Hazard Area	Amend SUB-R12 as it applies to 40 Marsden Road, Paihia, as the rule is not appropriate for the site given its frontage and existing use rights which make it impractical to achieve the requirement.
Lynley Newport (S113)	S113.001	Subdivision	SUB-R12	Oppose	The rule is overly restrictive, and not completely consistent with the Regional Policy Statement for Northland. The latter requires subdivision plans to identify that building platforms are located outside high risk coastal hazard areas where as SUB-R12 just says 'coastal hazard area' regardless of level of risk. My understanding is that there is a distinction in the NRC's on-line coastal hazard mapping between levels of risk and these maps I believe have been brought into the PDP. Whilst a default	Amend the rule to be less restrictive. Council could reserve the default to non complying activity status for the high risk coastal hazards; and default to discretionary activity status for the lesser risk (likelihood) coastal hazard events.

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					to non complying activity status when not meeting the restricted discretionary status would appear reasonable, if it is isn't possible to identify building platforms outside the high risk coastal hazard areas, I believe a default to discretionary activity status is more appropriate where the risk is not as high.	
Thomson Survey Limited (S205)	S205.001	Subdivision	SUB-R12	Oppose	The rule is overly restrictive and not consistent with the Regional Policy Statement for Northland. Whilst a default to non-complying activity status when not meeting the restricted discretionary status would appear reasonable if it is isn't possible to identify building platforms outside the high risk coastal hazard areas, I believe a default to discretionary activity status is more appropriate where the risk is not as high.	Amend SUB-R12 to default to non-complying activity status for the high risk coastal hazards; and default to discretionary activity status for the lesser risk (likelihood) coastal hazard events.
Haigh Workman Limited (S215)	S215.032	Subdivision	SUB-R12	Support	We support subdivisions in natural hazard areas being much more restricted than subdivisions outside these areas. Subdivisions that result in development in flood hazard areas should be avoided.	Retain Restricted Discretionary and Non-Complying status for subdivisions in natural hazards areas.
Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd (S344)	S344.012	Subdivision	SUB-R12	Not Stated	As proposed, rule SUB-R12 is inefficient and ineffective. Coastal and flood hazard areas are mapped overlays, rules and constraints apply to the mapped location. These rules will result in any subdivision of any site containing a portion of identified coastal hazard as a restricted discretionary activity no matter what the potential risk is	Amend SUB-R12 to provide for subdivision of land mapped as a coastal or flood hazard area as a restricted discretionary activity.
John Andrew Riddell (S431)	S431.082	Subdivision	SUB-R12	Not Stated	Well designed subdivision is an important component of achieving sustainable use and development of natural and physical resources, and in establishing and continuing character and sense of place. There is an inappropriate emphasis on ensuring that vehicle requirements and needs are provided for in the subdivision rules. In urban areas and settlements and in their surrounds good resource management practice is for increased provision for cycling and other active	Insert the following as further matters of control in all controlled activity subdivision rules and as further matters of discretion in all restricted discretionary activity subdivision rules: <ul style="list-style-type: none"> consistency with the scale, density, design and character of the

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					transport and for walking access. Indeed this is a necessary measure to help mitigate and adapt to the effects of climate change.	<p>environment and purpose of the zone</p> <ul style="list-style-type: none"> • measures to mitigate and adapt to climate change • where relevant, measures to provide for active transport, protected cycleways and for walking
Fire and Emergency New Zealand (S512)	S512.033	Subdivision	SUB-R12	Support in part	Given Fire and Emergency's secondary function responding to natural hazard emergencies, Fire and Emergency support the approach of controlling development/subdivision in identified natural hazard areas. It is essential that emergency responders are able to access potential emergencies on these sites.	Include an additional matter of control/matter of discretion to SUB-R12 having adequate access for emergency response to each lot created.
Ngā Tai Ora - Public Health Northland (S516)	S516.057	Subdivision	SUB-R12	Not Stated	As proposed, rules SUB-R11 and SUB-R12 are inefficient and ineffective. Coastal and flood hazard areas are mapped overlays, rules and constraints apply to the mapped location. These rules will result in any subdivision of any site containing a portion of identified coastal hazard as a restricted discretionary activity no matter what the potential risk is. Ngā Tai Ora, consider that this method is onerous, placing considerable cost on landowners particularly when provisions of affordable, safe and healthy housing is essential in the Far North District.	Amend Rule SUB-R12 to be a permitted activity where building platforms and associated access for each allotment is located wholly outside the spatial extent of the Coastal Hazard Area.
Kāinga Ora Homes and Communities (S561)	S561.050	Subdivision	SUB-R12	Support	Rule SUB-R12 is part of the natural hazard framework contained within the Proposed Plan ensuring land unsuitable for development is removed from development potential.	Retain Rule SUB-R12 as notified.
John Andrew	S431.083	Subdivision	SUB-R13	Not Stated	Well designed subdivision is an important component of achieving sustainable use and development of natural and physical resources,	Insert the following as further matters of control in all controlled activity subdivision rules and as

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Riddell (S431)					<p>and in establishing and continuing character and sense of place. There is an inappropriate emphasis on ensuring that vehicle requirements and needs are provided for in the subdivision rules. In urban areas and settlements and in their surrounds good resource management practice is for increased provision for cycling and other active transport and for walking access. Indeed this is a necessary measure to help mitigate and adapt to the effects of climate change.</p>	<p>further matters of discretion in all restricted discretionary activity subdivision rules:</p> <ul style="list-style-type: none"> • consistency with the scale, density, design and character of the environment and purpose of the zone • measures to mitigate and adapt to climate change • where relevant, measures to provide for active transport, protected cycleways and for walking
John Andrew Riddell (S431)	S431.084	Subdivision	SUB-R14	Not Stated	<p>Well designed subdivision is an important component of achieving sustainable use and development of natural and physical resources, and in establishing and continuing character and sense of place. There is an inappropriate emphasis on ensuring that vehicle requirements and needs are provided for in the subdivision rules. In urban areas and settlements and in their surrounds good resource management practice is for increased provision for cycling and other active transport and for walking access. Indeed this is a necessary measure to help mitigate and adapt to the effects of climate change.</p>	<p>Insert the following as further matters of control in all controlled activity subdivision rules and as further matters of discretion in all restricted discretionary activity subdivision rules:</p> <ul style="list-style-type: none"> • consistency with the scale, density, design and character of the environment and purpose of the zone • measures to mitigate and adapt to climate change • where relevant, measures to provide

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						for active transport, protected cycleways and for walking
John Andrew Riddell (S431)	S431.085	Subdivision	SUB-R15	Not Stated	<p>Well designed subdivision is an important component of achieving sustainable use and development of natural and physical resources, and in establishing and continuing character and sense of place.</p> <p>There is an inappropriate emphasis on ensuring that vehicle requirements and needs are provided for in the subdivision rules. In urban areas and settlements and in their surrounds good resource management practice is for increased provision for cycling and other active transport and for walking access. Indeed this is a necessary measure to help mitigate and adapt to the effects of climate change.</p>	<p>Insert the following as further matters of control in all controlled activity subdivision rules and as further matters of discretion in all restricted discretionary activity subdivision rules:</p> <ul style="list-style-type: none"> • consistency with the scale, density, design and character of the environment and purpose of the zone • measures to mitigate and adapt to climate change • where relevant, measures to provide for active transport, protected cycleways and for walking
Imerys Performance Minerals Asia Pacific (S65)	S65.017	Subdivision	SUB-R16	Oppose	<p>The proposal to require subdivision as a Discretionary Activity, and the qualifying DIS-1, only considers subdivision that will result in dwellings being built. However, boundary adjustments may occur as a result of areas being rehabilitated following exhaustion of the minerals deposit and the potential passive / active recreational activities that may occur. Note 5.1.5(e) of the RPS requires consultation with owners of regionally significant mineral resources when proposed subdivision, land use or development may have an adverse effect.</p>	amend SUB- R16 to controlled activity

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Ventia Ltd (S424)	S424.013	Subdivision	SUB-R16	Oppose	The proposal to require subdivision as a Discretionary Activity, and the qualifying DIS-1, only considers subdivision that will result in dwellings being built. However, boundary adjustments may occur as a result of areas being rehabilitated following exhaustion of the minerals deposit and the potential passive / active recreational activities that may occur. Note 5.1.5(e) of the RPS requires consultation with owners of regionally significant mineral resources when proposed subdivision, land use or development may have an adverse effect.	Amend to a controlled activity.
Martin John Yuretich (S40)	S40.008	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one landowner.	Delete SUB-R17 as this does not protect SNAs
Joel Vieviorka (S41)	S41.008	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete SUB-R17 as this does not protect SNAs
Robyn Josephine Baker (S69)	S69.006	Subdivision	SUB-R17	Oppose	It is totally unacceptable for FNDC to essentially 'take' land without market rate compensation. These rules appear to have the same effect as the previously tabled SNA proposals which were supposedly discarded when the ratepayers made their feelings very clear to the government. We have purchased this land and worked hard to clear it of noxious vegetation this includes, at our own expense and physical effort, removing gorse, tobacco weed, Australian Sedge and Ragwort. It is completely unreasonable that we should have to pay an ecologist to prove that our small amount of regenerated 'Native Bush' is not an SNA. Given that our Title already includes covenanted land that we are protecting - as is the case for most land owners in the area. We believe that FNDC should not be legally allowed to	Delete Rule SUB-R17

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					commandeer any further land by underhand means as is proposed. That these policies are being forced down from 'the top', where 'the top' exists outside of NZ, makes a complete mockery of NZ as a supposed democracy.	
Strand Homes Ltd/Okahu Developments Ltd (S77)	S77.007	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete SUB-R17 as this does not protect SNAs
Lynley Newport (S114)	S114.001	Subdivision	SUB-R17	Oppose	There is no reason why a subdivision should become non complying simply because the scheduled SNA is to be divided. There is no issue if the appropriate legal protection can be maintained over more than one allotment. It is possible to subdivide QEII covenanted land with the permission of QEII, and land subject to a Conservation Covenant can also be subdivided subject to the agreement of the parties. There is no reason to retain DIS-2.	Delete DIS-2 from SUB-R17.
Trevor John Ashford (S146)	S146.008	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete SUB-R17 as this does not protect SNAs
Shanon Garton (S161)	S161.007	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete SUB-R17 as this does not protect SNAs
Julianne Sally Bainbridge (S163)	S163.011	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete SUB-R17 as this does not protect SNAs
Bentzen Farm Limited (S167)	S167.059	Subdivision	SUB-R17	Oppose	There are no scheduled SNAs in the Proposed Plan. In any event the existence of an SNA on a site should not alter the activity status to full discretionary / noncomplying activity.	Delete Rule SUB-R17

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Setar Thirty Six Limited (S168)	S168.060	Subdivision	SUB-R17	Oppose	There are no scheduled SNAs in the Proposed Plan. In any event the existence of an SNA on a site should not alter the activity status to full discretionary / noncomplying activity.	Delete Rule SUB-R17
The Shooting Box Limited (S187)	S187.052	Subdivision	SUB-R17	Oppose	There are no scheduled SNAs in the Proposed Plan. In any event the existence of an SNA on a site should not alter the activity status to full discretionary / noncomplying activity.	Delete Rule SUB-R17.
Thomson Survey Limited (S206)	S206.001	Subdivision	SUB-R17	Oppose	See no reason why a subdivision should become non-complying simply because the scheduled SNA is to be divided. If the appropriate legal protection can be maintained over more than one allotment, what is the issue? It is possible to subdivide QEII covenanted land with the permission of QEII, and land subject to a Conservation Covenant can also be subdivided subject to the agreement of the parties. There is no reason to retain DIS-2 of Rule SUB-R17.	Delete DIS-2 of Rule SUB-R17
Wendover Two Limited (S222)	S222.053	Subdivision	SUB-R17	Oppose	There are no scheduled SNAs in the Proposed Plan. In any event the existence of an SNA on a site should not alter the activity status to full discretionary / noncomplying activity.	Delete Rule SUB-R17
Matauri Trustee Limited (S243)	S243.077	Subdivision	SUB-R17	Oppose	There are no scheduled SNAs in the Proposed Plan. In any event the existence of an SNA on a site should not alter the activity status to full discretionary/noncomplying activity.	Delete Rule SUB-R17
Trent Simpkin (S283)	S283.010	Ecosystems and indigenous biodiversity	SUB-R17	Oppose	This rule does not protect SNAs. This is not incentivising people to plant trees and create wetlands, because of the control over that area once it's matured. Far North residents will be better off to not plant anything. This therefore is a loss of property and property rights.	Delete SUB-R17
Tristan Simpkin (S287)	S287.009	Subdivision	SUB-R17	Oppose	This rule does not protect SNAs. This is not incentivising people to plant trees and create wetlands, because of the control over that area once it's matured. Far North residents will be	Delete SUB-R17

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					better off to not plant anything. This therefore is a loss of property and property rights.	
P S Yates Family Trust (S333)	S333.052	Subdivision	SUB-R17	Oppose	There are no scheduled SNAs in the Proposed Plan. In any event the existence of an SNA on a site should not alter the activity status to full discretionary / noncomplying activity	Delete Rule SUB-R17
Sapphire Surveyors Limited (S348)	S348.006	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete Rule SUB-R17 as this does not protect SNAs
Sean Frieling (S357)	S357.037	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one landowner.	Delete SUB-R17 as this does not protect SNAs
Leah Frieling (S358)	S358.040	Subdivision	SUB-R17	Oppose	Delete Rule SUB-R17 as this does not protect significant natural areas.	Delete Rule SUB-R17
Director-General of Conservation (Department of Conservation) (S364)	S364.056	Subdivision	SUB-R17	Oppose	Rule SUB-R17 requires the subdivision of a site containing a scheduled SNA to be considered as a discretionary activity. The Director-General is supportive of this activity status, however, is concerned with the effectiveness of the subdivision chapter in relation to SNA sites given there are no SNAs currently listed under Schedule 4 of the Proposed District Plan. The subdivision chapter does not appear to take into account the subdivision of a site with a potential SNA that is not yet scheduled. The Director-General submits that this could lead to potential SNA sites being subdivided with no ability to consider the adverse effects on the SNA at subdivision stage.	Amend the wording of Rule SUB-R17 to "Subdivision of a site containing a scheduled or qualifying SNA".
Director-General of Conservation (Department	S364.057	Subdivision	SUB-R17	Oppose	Rule SUB-R17 requires the subdivision of a site containing a scheduled SNA to be considered as a discretionary activity. The Director-General is supportive of this activity status, however, is concerned with the effectiveness of the	Insert more stringent controls to allow for the consideration and scheduling of SNAs in the subdivision chapter.

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t of Conservation (S364)					subdivision chapter in relation to SNA sites given there are no SNAs currently listed under Schedule 4 of the Proposed District Plan. The subdivision chapter does not appear to take into account the subdivision of a site with a potential SNA that is not yet scheduled. The Director-General submits that this could lead to potential SNA sites being subdivided with no ability to consider the adverse effects on the SNA at subdivision stage.	
Director-General of Conservation (Department of Conservation) (S364)	S364.058	Subdivision	SUB-R17	Oppose	Rule SUB-R17 requires the subdivision of a site containing a scheduled SNA to be considered as a discretionary activity. The Director-General is supportive of this activity status, however, is concerned with the effectiveness of the subdivision chapter in relation to SNA sites given there are no SNAs currently listed under Schedule 4 of the Proposed District Plan. The subdivision chapter does not appear to take into account the subdivision of a site with a potential SNA that is not yet scheduled. The Director-General submits that this could lead to potential SNA sites being subdivided with no ability to consider the adverse effects on the SNA at subdivision stage.	Review all restricted discretionary activity and controlled activity rules and add matters of discretion/control for indigenous biodiversity where not already identified. Alternatively, and preferably, formally include sites that meet SNA criteria under Schedule 4 of the Proposed District Plan.
Rua Hatu Trust (S377)	S377.008	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete SUB-R17 as this does not protect SNAs
Sean Jozef Vercammen (S395)	S395.008	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete SUB-R17 as this does not protect SNAs
Kerry-Anne Smith (S410)	S410.008	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete SUB-R17 as this does not protect SNAs

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Roger Myles Smith (S411)	S411.008	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete SUB-R17 as this does not protect SNAs
John Joseph and Jacqueline Elizabeth Matthews (S439)	S439.008	Subdivision	SUB-R17	Oppose	Rule SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete Rule SUB-R17
Kapiro Conservation Trust (S442)	S442.105	Subdivision	SUB-R17	Support in part	SUB-R17 makes subdivision of a scheduled SNA a discretionary activity. However, there are no scheduled SNAs in the Plan and it is unknown when the Plan will schedule any. SUB-R17 should apply to all SNAs not just scheduled SNAs There needs to be an assessment of a property for an SNA prior to any subdivision so the land owner can work out which rules will apply. As drafted the subdivision rules have the potential to carve up SNAs throughout the district and these rules do not give effect Council's responsibilities under the RMA, s6(c) and the RPS.	Amend SUB-R17 so SNAs are protected this may require an assessment before all subdivisions are commenced to determine activity status.
Kapiro Conservation Trust (S442)	S442.106	Subdivision	SUB-R17	Support in part	Agree subdivision of land containing an SNA should be an SNA. However, the proposed plan does not have any scheduled SNAs. It is unknown when the plan will schedule any SNAs. If SNAs are not mapped then the land owner will need to work out if the land does actually contain an SNA. This condition should be added to all of the	Amend activity if SNAs not scheduled: Subdivision of a site containing a scheduled SNA.
Waiaua Bay Farm Limited (S463)	S463.049	Subdivision	SUB-R17	Oppose	This rule appears intended to address the subdivision of SNAs. WBF concurs that such proposals warrant a rigorous consenting regime. However, the reason for this rule placing greater value on SNAs in the coastal environment (non-complying status), than on SNAs outside the coastal environment is unclear. WBF considers that a more appropriate approach would be to apply a non-complying consenting pathway to proposals to subdivide	Amend Rule SUB-R17 to reserve non-complying activity status for subdivisions that actually divide an SNA. Remove the activity status distinction based on location in the coastal environment for subdivisions that include (but do not divide) SNAs.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					SNAs. A discretionary pathway for subdivisions that include, but do not divide, SNAs, whether or not in the coastal environment, is more appropriate. Such subdivisions may have positive effects for SNAs depending on the context. Therefore a "blanket" non-complying setting is, in WBF's view, not an appropriate default position.	
LJ King Ltd (S464)	S464.008	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete SUB-R17 as this does not protect SNAs.
Helmut Friedrich Paul Letz and Angelika Eveline Letz (S470)	S470.008	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete SUB-R17 as this does not protect SNAs
Michael Foy (S472)	S472.045	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one landowner.	Delete SUB-R17 as this does not protect SNAs
Elbury Holdings (S485)	S485.006	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete SUB-R17 as this does not protect SNAs
Northland Planning and Development 2020 Limited (S502)	S502.086	Subdivision	SUB-R17	Support in part	Clarification is sought in regard to the Non complying activity status where compliance is not achieved with DIS-1 and DIS-2. Does this mean that if compliance is achieved with either DIS-1 or DIS-2 that activity status is Discretionary.	Amend SUB-R17 to clarify in regard to the Non complying activity status where compliance is not achieved with DIS-1 and DIS-2. Does this mean that if compliance is achieved with either DIS-1 or DIS-2 that activity status is Discretionary.
Royal Forest and Bird Protection	S511.086	Subdivision	SUB-R17	Support in part	SUB-R17 makes subdivision of a scheduled SNA a discretionary activity. However, there are no scheduled SNAs in the Plan and it is unknown when the Plan will schedule any. SUB-	Amend SUB-R17 so SNAs are protected this may require an assessment before all subdivisions are commenced to

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Society of New Zealand (S511)					R17 should apply to all SNAs not just scheduled SNAs There needs to be an assessment of a property for an SNA prior to any subdivision so the land owner can work out which rules will apply. As drafted the subdivision rules have the potential to carve up SNAs throughout the district and these rules do not give effect Council's responsibilities under the RMA, s6(c) and the RPS.	determine activity status
Royal Forest and Bird Protection Society of New Zealand (S511)	S511.087	Subdivision	SUB-R17	Support in part	Agree subdivision of land containing an SNA should be an SNA. However, the proposed plan does not have any scheduled SNAs. It is unknown when the plan will schedule any SNAs. If SNAs are not mapped then the land owner will need to work out if the land does actually contain an SNA. This condition should be added to all of the	Amend activity: "Subdivision of a site containing a scheduled SNA" if SNAs are not scheduled.
Elbury Holdings (S519)	S519.006	Subdivision	SUB-R17	Oppose	The provision does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete SUB-R17.
Elbury Holdings (S541)	S541.008	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete SUB-R17 as this does not protect SNAs.
LJ King Limited (S543)	S543.008	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete SUB-R17 as this does not protect SNAs
Kelvin Richard Horsford (S544)	S544.008	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete SUB-R17 as this does not protect SNAs
LJ King Limited (S547)	S547.008	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete SUB-R17 as this does not protect SNAs

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Rodney S Gates and Cherie R Gates (S569)	S569.008	Subdivision	SUB-R17	Oppose	SUB-R17 requires that a subdivision does not divide an SNA. This rule does not protect SNAs but just makes it easier for Council to commandeer them, since they only need to deal with one land owner.	Delete SUB-R17 as this does not protect SNAs
Bentzen Farm Limited (S167)	S167.060	Subdivision	SUB-R18	Support in part	On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole.	Amend Rule SUB-R18 as follows: SUB-R18 Subdivision of a site within an Outstanding Natural Landscape and Outstanding Natural Feature (where any boundary of a new lot to be created (excluding boundary adjustments) is within that part of the existing site covered by the overlay)
Setar Thirty Six Limited (S168)	S168.061	Subdivision	SUB-R18	Support in part	On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole. The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots.	Amend Rule SUB-R18 as follows: Subdivision of a site within an Outstanding Natural Landscape and Outstanding Natural Feature (where any boundary of a new lot to be created (excluding boundary adjustments) is within that part of the existing site covered by the overlay)
The Shooting	S187.053	Subdivision	SUB-R18	Support in part	The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the	Amend Rule SUB-R18 as follows: SUB-R18 Subdivision of a site within an Outstanding Natural

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Box Limited (S187)					other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots.	Landscape and Outstanding Natural Feature (where any boundary of a new lot to be created (excluding boundary adjustments) is within that part of the existing site covered by the overlay).
Wendover Two Limited (S222)	S222.054	Subdivision	SUB-R18	Support in part	On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole. The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots.	Amend Rule SUB-R18 as follows: SUB-R18 Subdivision of a site within an Outstanding Natural Landscape and Outstanding Natural Feature (where any boundary of a new lot to be created (excluding boundary adjustments) is within that part of the existing site covered by the overlay)
Matauri Trustee Limited (S243)	S243.078	Subdivision	SUB-R18	Support in part	On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within	Amend Rule SUB-R18 as follows: SUB-R18 Subdivision of a site within an Outstanding Natural Landscape and Outstanding Natural Feature (where any boundary of a new lot to be created (excluding boundary adjustments) is within that part

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole.</p> <p>The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots</p>	<p>of the existing site covered by the overlay)</p>
<p>P S Yates Family Trust (S333)</p>	<p>S333.053</p>	<p>Subdivision</p>	<p>SUB-R18</p>	<p>Support in part</p>	<p>On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole.</p> <p>The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots</p>	<p>Amend Rule SUB-R18 as follows SUB-R18 Subdivision of a site within an Outstanding Natural Landscape and Outstanding Natural Feature (where any boundary of a new lot to be created (excluding boundary adjustments) is within that part of the existing site covered by the overlay)</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Director-General of Conservation (Department of Conservation) (S364)	S364.059	Subdivision	SUB-R18	Support	The Director-General supports the activity status associated with Rule SUB-R18	Retain Rule SUB-R18
Bentzen Farm Limited (S167)	S167.061	Subdivision	SUB-R19	Support in part	On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole.	Amend Rule SUB-R19 as follows: SUB-R18 SUB-R19 Subdivision of a site within wetland, lake and river margins (where any boundary of a new lot to be created (excluding boundary adjustments) is within the margin)
Setar Thirty Six Limited (S168)	S168.062	Subdivision	SUB-R19	Support in part	On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole. The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots.	Amend Rule SUB-R19 as follows: Subdivision of a site within wetland, lake and river margins (where any boundary of a new lot to be created (excluding boundary adjustments) is within the margin)

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
The Shooting Box Limited (S187)	S187.054	Subdivision	SUB-R19	Support in part	The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots.	Amend Rule SUB-R19 as follows: SUB-R18 SUB-R19 Subdivision of a site within wetland, lake and river margins (where any boundary of a new lot to be created (excluding boundary adjustments) is within the margin).
Wendover Two Limited (S222)	S222.055	Subdivision	SUB-R19	Support in part	On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole. The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots.	Amend Rule SUB-R19 as follows: SUB-R19 Subdivision of a site within wetland, lake and river margins (where any boundary of a new lot to be created (excluding boundary adjustments) is within the margin)
Matauri Trustee Limited (S243)	S243.079	Subdivision	SUB-R19	Support in part	On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole. The rule should also only be restricted to the	Amend Rule SUB-R19 as follows: SUB-R19 Subdivision of a site within wetland, lake and river margins (where any boundary of a new lot to be created (excluding boundary adjustments) is within the margin)

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots.	
<p>P S Yates Family Trust (S333)</p>	S333.054	Subdivision	SUB-R19	Support	<p>On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole. The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots.</p>	<p>Amend Rule SUB-R19 as follows: SUB-R19 Subdivision of a site within wetland, lake and river margins (where any boundary of a new lot to be created (excluding boundary adjustments) is within the margin)</p>
<p>Director-General of Conservation (Department)</p>	S364.060	Subdivision	SUB-R19	Support	<p>The Director-General supports the activity status associated with Rule SUB-R19</p>	<p>Retain Rule SUB-R19</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
t of Conservation) (S364)						
Northland Planning and Development 2020 Limited (S502)	S502.085	Subdivision	SUB-R19	Support in part	Clarification is sought as to whether a subdivision application is automatically a discretionary activity if the site contains a wetland, lake and /or river margin. We have assumed that the intent of this is to capture any subdivisions where a boundary may run through a wetland, lake or river. We note that generally if you are creating a boundary a waterbody is normally a nice natural boundary to follow. Avoiding this may result in unnecessary crossings being formed to access land. We would also like to point out that if giving esplanade reserve, that this would be creating a boundary within the margin of a wetland, lake or river margin which would trigger Discretionary consent. This would be a perverse outcome.	Amend SUB-R19 to clarify whether a subdivision application is automatically a discretionary activity if the site contains a wetland, lake and /or river margin.
Bentzen Farm Limited (S167)	S167.062	Subdivision	SUB-R20	Support in part	On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole.	Amend Rule SUB-R20 as follows: SUB-R20 Subdivision of a site within the Coastal Environment (excluding Outstanding Natural Character Areas) (where any boundary of a new lot to be created (excluding boundary adjustments) is within that part of the existing site covered by the overlay)
Setar Thirty Six Limited (S168)	S168.063	Subdivision	SUB-R20	Support in part	On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within	Amend Rule SUB-R20 as follows: Subdivision of a site within the Coastal Environment (excluding Outstanding Natural Character Areas) (where any boundary of a new lot to be created (excluding boundary adjustments) is within that part

SUMMARY OF SUBMISSIONS

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole.</p> <p>The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots.</p>	<p>of the existing site covered by the overlay)</p>
<p>The Shooting Box Limited (S187)</p>	<p>S187.055</p>	<p>Subdivision</p>	<p>SUB-R20</p>	<p>Support in part</p>	<p>The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots.</p>	<p>Amend Rule SUB-R20 as follows: SUB-R20 Subdivision of a site within the Coastal Environment (excluding Outstanding Natural Character Areas) (where any boundary of a new lot to be created (excluding boundary adjustments) is within that part of the existing site covered by the overlay).</p>
<p>Wendover Two Limited (S222)</p>	<p>S222.056</p>	<p>Subdivision</p>	<p>SUB-R20</p>	<p>Support in part</p>	<p>On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole. The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this</p>	<p>Amend Rule SUB-R20 as follows: SUB-R20 Subdivision of a site within the Coastal Environment (excluding Outstanding Natural Character Areas) (where any boundary of a new lot to be created (excluding boundary adjustments) is within that part of the existing site covered by the overlay)</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					submission seeks to limit the application of the rule only to the creation of new lots.	
Matauri Trustee Limited (S243)	S243.080	Subdivision	SUB-R20	Support in part	<p>On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole.</p> <p>The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots.</p>	Amend Rule SUB-R20 as follows: SUB-R20 Subdivision of a site within the Coastal Environment (excluding Outstanding Natural Character Areas) (where any boundary of a new lot to be created (excluding boundary adjustments) is within that part of the existing site covered by the overlay)
Willowridge Developments Limited (S250)	S250.011	Subdivision	SUB-R20	Oppose	<p>SUB-R20 is a blunt approach to the management of subdivision within the CE, in the context of the minimum allotment size provisions provide in SUB-S1. Subdivision does not necessary require physical works and does not always propose or introduce built form. The PDP already contains provisions for the management of built form, land disturbance and vegetation clearance (i.e., Rules CE-R1 and CE-R3, and standards CE-S1 and CE-S3).</p> <p>While it is understood that NZCPS requires the avoidance of adverse effects of subdivision on the natural character of the coastal environment, it is considered that this could be achieved through appropriate matters of control/discretion or assessment criteria elsewhere in the subdivision provisions, i.e., in SUB-R13 or SUB-P11.</p>	Delete rule, and review the provisions, incorporating either a targeted policy or assessment criteria in the rule SUB-R13.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
P S Yates Family Trust (S333)	S333.055	Subdivision	SUB-R20	Support in part	On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole. The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots.	Amend Rule SUB-R20 as follows: SUB-R20 Subdivision of a site within the Coastal Environment (excluding Outstanding Natural Character Areas) (where any boundary of a new lot to be created (excluding boundary adjustments) is within that part of the existing site covered by the overlay)
Ed and Inge Amsler (S341)	S341.014	Subdivision	SUB-R20	Oppose	Subdivision in the Coastal Environment should align to the underlying zone provisions for subdivision allotment sizes. As a Discretionary Activity SUB-R20 includes no specific criteria to consider. It seems more appropriate for any subdivision within the Coastal Environment to assess the characteristics and qualities within that area, with specific assessment criteria as opposed to a blanket discretionary activity status.	Amend subdivision within a Coastal Environment to have alignment to the underlying zoning of a site and consider the intent of the zone and its minimum allotment sizes.
Director-General of	S364.061	Subdivision	SUB-R20	Support	The Director-General supports the activity status associated with Rule SUB-R20	Retain Rule SUB-R20

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Conservation (Department of Conservation) (S364)						
Sarah Ballantyne and Dean Agnew (S386)	S386.016	Subdivision	SUB-R20	Oppose	<p>This rule makes any subdivision within the CE a discretionary activity. In the proposed RPROZ, allotments must have a minimum lot size of 40ha to be a controlled activity, it is unclear how or why subdivision of lots of this size would require discretionary activity resource consent assessment solely based on the site being identified within the CE. This is considered to be overly restrictive, particularly when considering the minimum allotment sizes outlined in SUB-S1 of the PDP.</p> <p>Subdivision does not always require physical works and does not necessarily propose or introduce built form. Regardless, the PDP already contains provisions for the management of built form, land disturbance and vegetation clearance (i.e., Rules CE-R1 and CE-R3, and standards CE-S1 and CE-S3).</p> <p>It is considered that the natural character of the coastal environment is already managed by elsewhere in the PDP and there is no need to duplicate the assessment here.</p>	Delete rule, and review the provisions, incorporating either a targeted policy or assessment criteria in the rule SUB-R13.
Sarah Ballantyne and Dean Agnew (S386)	S386.017	Subdivision	SUB-R20	Oppose	<p>Ballantyne & Agnew oppose this</p> <p>This rule makes any subdivision within the CE a discretionary activity. In the proposed RPROZ, allotments must have a minimum lot size of 40ha to be a controlled activity, it is unclear how or why subdivision of lots of this size would require discretionary activity resource consent assessment solely based on the site being identified within the CE. This is considered to be overly restrictive, particularly when considering the minimum allotment sizes outlined in SUB-S1 of the PDP.</p> <p>Subdivision does not always require physical</p>	Delete rule, and review the provisions, incorporating either a targeted policy or assessment criteria in the rule SUB-R13.

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					works and does necessarily propose or introduce built form. Regardless, the PDP already contains provisions for the management of built form, land disturbance and vegetation clearance (i.e., Rules CE-R1 and CE-R3, and standards CE-S1 and CE-S3). It is considered that the natural character of the coastal environment is already managed by elsewhere in the PDP and there is no need to duplicate the assessment here.	
John Andrew Riddell (S431)	S431.089	Subdivision	SUB-R20	Not Stated	Not stated	Amend rule SUB-R20, subdivision of site within the Coastal Environment, so that it does not apply to subdivision within urban areas
Waiaua Bay Farm Limited (S463)	S463.050	Subdivision	SUB-R20	Oppose	This generic rule unduly disregards, and is likely to unnecessarily complicate the realisation of, the orderly and planned subdivision of land in the Special Purpose Zones. For example, this rule would override the restricted discretionary consenting pathway for subdivision in the Golf Living subzone at Kauri Cliffs. This "trumping" of the KCZ provisions is unnecessary. The zone provides ample, specific, policy direction and assessment matters (with the amendments recommended in the submission) about the expected subdivision outcomes.	Amend Rule SUB-R20 as follows: SUB-R20 Subdivision of a site within the Coastal Environment (excluding Outstanding Natural Character Areas) All zones Activity status: Discretionary a. This rule does not apply to land in the Kauri Cliffs Zone.
Northland Planning and Development 2020 Limited (S502)	S502.087	Subdivision	SUB-R20	Support in part	Clarification is sought that regardless of the lot size if the site or part of the site is located within the Coastal Environment the activity status is Discretionary.	Amend SUB-R20 to clarify if the site or part of the site is located within the Coastal Environment the activity status is Discretionary regardless of lot size.
Bentzen Farm Limited (S167)	S167.063	Subdivision	SUB-R21	Support in part	On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions.	Amend Rule SUB-R21 as follows: SUB-R21 Subdivision of a site within Outstanding Natural Character Areas in the Coastal Environment (where any

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					Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole.	boundary of a new lot to be created (excluding boundary adjustments) is within that part of the existing site covered by the overlay)
Setar Thirty Six Limited (S168)	S168.064	Subdivision	SUB-R21	Support in part	<p>On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole.</p> <p>The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots.</p>	Amend Rule SUB-R21 as follows: Subdivision of a site within Outstanding Natural Character Areas in the Coastal Environment (where any boundary of a new lot to be created (excluding boundary adjustments) is within that part of the existing site covered by the overlay)
The Shooting Box Limited (S187)	S187.056	Subdivision	SUB-R21	Support in part	<p>The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots.</p>	Amend Rule SUB-R21 as follows: SUB-R21 Subdivision of a site within Outstanding Natural Character Areas in the Coastal Environment (where any boundary of a new lot to be created (excluding boundary adjustments) is within that part of the existing site covered by the overlay).

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Wendover Two Limited (S222)	S222.057	Subdivision	SUB-R21	Support in part	<p>On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole. The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots.</p>	<p>Amend Rule SUB-R21 as follows: SUB-R21 Subdivision of a site within Outstanding Natural Character Areas in the Coastal Environment (where any boundary of a new lot to be created (excluding boundary adjustments) is within that part of the existing site covered by the overlay)</p>
Matauri Trustee Limited (S243)	S243.081	Subdivision	SUB-R21	Support in part	<p>On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole.</p> <p>The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots.</p>	<p>Amend Rule SUB-R21 as follows: SUB-R21 Subdivision of a site within Outstanding Natural Character Areas in the Coastal Environment (where any boundary of a new lot to be created (excluding boundary adjustments) is within that part of the existing site covered by the overlay)</p>

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P S Yates Family Trust (S333)	S333.056	Subdivision	SUB-R21	Support in part	<p>On many sites the overlay or margin is a small component of a larger site. Subdivision of the balance of the site not covered by the overlay or margin should be able to occur in accordance with the standard subdivision provisions. Only where the new lot to be created (or boundary) is within the overlay should assessment be required under this rule. That may have been the intent of the drafting; however, as drafted, it may capture sites where only a part of them is within an overlay or margin yet applies the rule and activity status to subdivisions of the site as a whole.</p> <p>The rule should also only be restricted to the creation of new lots within these overlays/margins and should not apply to the other classes of subdivision provided for (for example, boundary adjustments). The revisions sought in this submission seeks to limit the application of the rule only to the creation of new lots</p>	Amend Rule SUB-R21 as follows: SUB-R21 Subdivision of a site within Outstanding Natural Character Areas in the Coastal Environment (where any boundary of a new lot to be created (excluding boundary adjustments) is within that part of the existing site covered by the overlay)
Director-General of Conservation (Department of Conservation) (S364)	S364.062	Subdivision	SUB-R21	Support	The Director-General supports the activity status associated with Rule SUB-R21	Retain Rule SUB-R21
New Zealand Pork Industry Board (S55)	S55.042	Subdivision	Standards	Oppose	Support the objective to avoid reverse sensitivity issues that would prevent or adversely affect activities already established on land from continuing to operate. However, this objective is not supported by clear policies or rules to give effect to this statement in rural areas.	amend standards to give effect to objective SUB - 01
New Zealand Pork Industry Board (S55)	S55.043	Subdivision	Standards	Support in part	Support the acknowledgement that subdivision should not result in reverse sensitivity effects that result in the inability to undertake activities enabled in the relevant zone. However, this acknowledgement is not supported by clear policies or rules to give effect to this statement in the rural zones	amend standards to give effect to reverse sensitivity protection described in the overview

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Julianne Sally Bainbridge (S163)	S163.004	Subdivision	Standards	Support in part	The storage of excess rainfall to be applied to the land in times of moisture deficit allows the soils to stay in a sponge like state and avoid the dry arid state which washes and blows away to add sediment.	Insert in standards all infrastructure must have appropriate infrastructure to protect the natural environment
Reuben Wright (S178)	S178.004	Subdivision	Standards	Support in part	Rules SUB-S2 - S8 do not appear to have an activity status expressed where any application will comply with the various Rules. It is assumed any subdivision should be either permitted or controlled where it complies with anyone of the rules, and restricted discretionary where it does not comply. An activity status should be referenced for each rule.	Amend to clarify activity status with compliance with SUB-S2-S8.
Reuben Wright (S178)	S178.006	Subdivision	Standards	Support in part	Rule SUB-S7 refers to 'Easements for any purpose'. This should not be a rule but rather a matter that control is reserved over or discretion is restricted to for any subdivision.	[Delete SUB-S7 and replace as matter of control/discretion for easements for any subdivision].
Waka Kotahi NZ Transport Agency (S356)	S356.092	Subdivision	Standards	Support	There should be a standard for assessing access and transportation effects as a result of subdivision.	Insert a new Standards that addresses access and transport effects.
Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust (S425)	S425.042	Subdivision	Standards	Support in part	In general, PHTTCCT support well-connected development, and future transport networks (see sub#4) being provided at the time of subdivision. Given the lack of spatial planning incorporated into the plan, it is considered that requiring developers to show how any future transport networks will be accommodated by the development is critical to future proof the District and ensure an integrated well connected transport network. Depending on the scale of development this could include requiring setbacks from indicative roads/cycleways as shown/described in any future or existing) strategies/spatial plans/annual plan be provided, or road connections provided at boundaries of the developments.	Amend the subdivision chapter to ensure that provision for, and connectivity with future transport networks is demonstrated at subdivision.
Kapiro Residents Association (S428)	S428.015	Subdivision	Standards	Support in part	It should be encouraged in the form of well-designed two or three storey buildings, for example, with requirements for permeable open areas including garden/landscaped ground.	Amend PDP to include objectives, policies and rules/standards that require best practice environmentally sustainable

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					<p>Developments should use permeable materials wherever feasible for surfaces such as driveways, paths.</p> <p>The PDP should require all new buildings to store/use roof water wherever possible, to avoid the need for expensive reticulation systems and reduce the need for water top-ups via water tankers. New buildings connected to a public water supply should be required to collect roof water in storage vessels to use for gardens and flushing toilets (at minimum) and contribute to other household water uses such as laundry connections. Water storage vessels do not need to be a traditional round tank - other useful shapes exist, such as rectangular upright vessels that are easy to install against the side of a house or garage, or short flat vessels designed to be completely buried underground or placed under the foundations of new builds. Greywater harvesting and re-use should also be required for new buildings. These types of water-saving measures would also reduce future Council infrastructure costs for additional water supplies and wastewater.</p> <p>Passive heating and cooling designs, for example, reduce energy consumption and the on-going costs of heating/cooling. Solar panels with batteries, for example, can be purchased on lease-to-buy schemes so that the owner/occupier only pays the amount that they would have paid anyway for grid electricity. Additional electricity generation by households will be essential for powering EVs in future because current national generation capacity is not sufficient.</p>	<p>techniques for new developments, including -</p> <ul style="list-style-type: none"> • Permeable materials wherever feasible for surfaces such as driveways, paths etc. • Best practice for lowest environmental impact and water sensitive designs, requiring greywater recycling techniques and other technologies to ensure efficient use of water, rain storage tanks for properties connected to a public water supply, additional water storage for buildings that rely solely on roof water (to cope with drought), and other measures • Renewable energy technologies and energy-efficient technologies, and similar requirements that foster improved environmental design/technologies and lower lifecycle climate impacts • Specified area (percentage) of tree canopy cover and green corridors should be required within new subdivisions. These will be increasingly important for shade/cooling for buildings and pedestrians in future.

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John Andrew Riddell (S431)	S431.070	Subdivision	Standards	Not Stated	<p>Well designed subdivision is an important component of achieving sustainable use and development of natural and physical resources, and in establishing and continuing character and sense of place.</p> <p>There is an inappropriate emphasis on ensuring that vehicle requirements and needs are provided for in the subdivision rules. In urban areas and settlements and in their surrounds good resource management practice is for increased provision for cycling and other active transport and for walking access. Indeed, this is a necessary measure to help mitigate and adapt to the effects of climate change.</p>	Revise the objectives, policies and provisions to better provide for cycling and active transport and walking in urban areas, settlements and their surrounds
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S521)	S521.018	Subdivision	Standards	Support in part	<p>It should be encouraged in the form of well-designed two or three storey buildings, for example, with requirements for permeable open areas including garden/landscaped ground. Developments should use permeable materials wherever feasible for surfaces such as driveways, paths.</p> <p>The PDP should require all new buildings to store/use roof water wherever possible, to avoid the need for expensive reticulation systems and reduce the need for water top-ups via water tankers. New buildings connected to a public water supply should be required to collect roof water in storage vessels to use for gardens and flushing toilets (at minimum) and contribute to other household water uses such as laundry connections. Water storage vessels do not need to be a traditional round tank - other useful shapes exist, such as rectangular upright vessels that are easy to install against the side of a house or garage, or short flat vessels designed to be completely buried underground or placed under the foundations of new builds. Greywater harvesting and re-use should also be required for new buildings. These types of water-saving measures would also reduce future Council infrastructure costs for additional water</p>	<p>Amend PDP to include objectives, policies and rules/standards that require best practice environmentally sustainable techniques for new developments, including -</p> <ul style="list-style-type: none"> • Permeable materials wherever feasible for surfaces such as driveways, paths etc. • Best practice for lowest environmental impact and water sensitive designs, requiring greywater recycling techniques and other technologies to ensure efficient use of water, rain storage tanks for properties connected to a public water supply, additional water storage for buildings that rely solely on roof water (to cope with drought), and other measures • Renewable energy technologies and energy-

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					<p>supplies and wastewater.</p> <p>Passive heating and cooling designs, for example, reduce energy consumption and the on-going costs of heating/cooling. Solar panels with batteries, for example, can be purchased on lease-to-buy schemes so that the owner/occupier only pays the amount that they would have paid anyway for grid electricity. Additional electricity generation by households will be essential for powering EVs in future because current national generation capacity is not sufficient.</p>	<p>efficient technologies, and similar requirements that foster improved environmental design/technologies and lower lifecycle climate impacts</p> <ul style="list-style-type: none"> Specified area (percentage) of tree canopy cover and green corridors should be required within new subdivisions. These will be increasingly important for shade/cooling for buildings and pedestrians in future.
<p>Carbon Neutral NZ Trust (S529)</p>	<p>S529.222</p>	<p>Subdivision</p>	<p>Standards</p>	<p>Support in part</p>	<p>It should be encouraged in the form of well-designed two or three storey buildings, for example, with requirements for permeable open areas including garden/landscaped ground. Developments should use permeable materials wherever feasible for surfaces such as driveways, paths.</p> <p>The PDP should require all new buildings to store/use roof water wherever possible, to avoid the need for expensive reticulation systems and reduce the need for water top-ups via water tankers. New buildings connected to a public water supply should be required to collect roof water in storage vessels to use for gardens and flushing toilets (at minimum) and contribute to other household water uses such as laundry connections. Water storage vessels do not need to be a traditional round tank - other useful shapes exist, such as rectangular upright vessels that are easy to install against the side of a house or garage, or short flat vessels designed to be completely buried underground or placed under the foundations of new builds. Greywater harvesting and re-use should also be required for new buildings. These types of water-</p>	<p>Amend PDP to include objectives, policies and rules/standards that require best practice environmentally sustainable techniques for new developments, including -</p> <ul style="list-style-type: none"> Permeable materials wherever feasible for surfaces such as driveways, paths etc. Best practice for lowest environmental impact and water sensitive designs, requiring greywater recycling techniques and other technologies to ensure efficient use of water, rain storage tanks for properties connected to a public water supply, additional water storage for buildings that rely solely on roof water (to cope with

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					<p>saving measures would also reduce future Council infrastructure costs for additional water supplies and wastewater.</p> <p>Passive heating and cooling designs, for example, reduce energy consumption and the on-going costs of heating/cooling. Solar panels with batteries, for example, can be purchased on lease-to-buy schemes so that the owner/occupier only pays the amount that they would have paid anyway for grid electricity. Additional electricity generation by households will be essential for powering EVs in future because current national generation capacity is not sufficient.</p>	<p>drought), and other measures</p> <ul style="list-style-type: none"> Renewable energy technologies and energy-efficient technologies, and similar requirements that foster improved environmental design/technologies and lower lifecycle climate impacts Specified area (percentage) of tree canopy cover and green corridors should be required within new subdivisions. These will be increasingly important for shade/cooling for buildings and pedestrians in future.
Rodney and Anne Jess (S6)	S6.001	Subdivision	SUB-S1	Oppose	The General Residential provisions for minimum allotment sizes should apply to Russell with exception of Heritage and Strand areas. This will allow Russell to grow and provide further land for development. Further rates will allow amenities in Russell to improve.	Apply the General Residential provisions for minimum allotment sizes to Russell with exception of Heritage and Strand areas of Russell. 600m2 (compliant), 300m2 (discretionary)
Ken Lewis Limited (S9)	S9.002	Subdivision	SUB-S1	Support	The subdivision standards reflect efficient use of land and maintain an intensity and scale found with urban areas of the District.	Retain min lot size for General Residential Zone.
Ken Lewis Limited (S9)	S9.003	Subdivision	SUB-S1	Support	The subdivision standards reflect efficient use of land.	Retain min lot sizes for Rural Residential Zone.
Jeanette Mcglashan (S17)	S17.001	Subdivision	SUB-S1	Oppose	Rural production can still be achieved in land holdings smaller than 8 ha. Do not disadvantage existing land holders and rate payers. The smaller lot sizes gives flexibility to land owners to meet needs of the land and also of families in the midst of a housing crisis especially prevalent in the far north district. Submitter has a small block of land zoned rural production of 16ha in	Amend the minimum allotment sizes for Rural Production Zone, to allow smaller lot sizes. Seeks that existing (Operative District Plan) allotment sizes for the Rural Production Zone are reinstated (inferred).

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					size. The new rules do not provide any flexibility to be able to subdivide this in future if so desired, other than halving the size of the land, this has a direct impact on the value of this investment and submitters ability to create allotment sizes that will benefit more people if desired while still holding the character of the land with smaller lots that can still be utilised for rural production.	
Trent Simpkin (S24)	S24.002	Subdivision	SUB-S1	Oppose	Nearly all of the land that was zoned Coastal Living (minimum discretionary lot size 5000m2) has been changed to Rural Lifestyle (minimum discretionary lot size 2ha which is 4x the size). All this land that could be subdivided down into 5,000m2 lots (under the Operative District Plan (inferred)), with the new Rural Lifestyle zone can only be as small as 20,000m2. The Far North needs to be growing, not shrinking, so we need to provide more properties for people to live on. New developments and parcels of land mean more rates for FNDC, increasing income and making our district a better, more vibrant place. See attachments as examples - Taipa, Kerikeri Inlet, Rangitane River Park, Paihia, Orongo Bay, Opuā. Also Ahipara.	Amend all Rural Lifestyle zoned land to Rural Residential (and let the coastal environment rules cover coastal issues); OR reduce the Rural Lifestyle Zone Discretionary minimum lot size to 5,000m2 (see attachments to original submission as examples)
Trent Simpkin (S25)	S25.001	Subdivision	SUB-S1	Support	Supports the proposed minimum lot size for Rural Residential Zone because engineers wastewater designers and the like have proved that Rural Residential sites can have an effective stormwater and wastewater system on lots as small as 2000m2, so i support this minimum size.	Retain Discretionary minimum lot size of 2000m2 for the Rural Residential Zone
Trent Simpkin (S26)	S26.001	Subdivision	SUB-S1	Support	Supports the proposed minimum lot size for General Residential (having 600m2 and 300m2 as minimum lot sizes) because it allows for smaller developments in serviced areas, providing more affordable houses for Far Northlanders to purchase.	Retain proposed minimum lot sizes for General Residential at 600m2 and 300m2.
Trent Simpkin (S27)	S27.001	Subdivision	SUB-S1	Support	Support mixed use having no minimum lot size. This allows for townhouse developments and	Retain the proposed standard for Mixed Use zone, which has no minimum lot size for Mixed Use

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					similar in townships like Kerikeri where they would be super beneficial for the working class.	Zone.
Elizabeth Irvine (S39)	S39.002	Subdivision	SUB-S1	Support	Ms Irvine supports the minimum allotment size for a discretionary activity subdivision within the RRZ being reduced to 2,000m ² from 3,000m ² under the Rural Living zone in the Operative Far North District Plan.	Retain the 2000m ² minimum allotment size for a discretionary activity subdivision within the Rural Residential zone
Elizabeth Irvine (S39)	S39.003	Subdivision	SUB-S1	Oppose	Ms Irvine opposes the minimum allotment size of 4,000m ² for a controlled activity subdivision within the RRZ. because: - there are a large number of sites within the Rural Residential Zone with allotment sizes ranging from just under 2,000m ² to 4,000m ² - It would be appropriate to recognise this pattern of development by including a new restricted discretionary activity for subdivisions with a minimum. allotment size of 2,500m ² in the Rural Residential Zone. Similarly, a new restricted discretionary activity for one residential unit within a site area of at least 2,500m ² should be included in the RRZ rules.	Amend S1 to provide: minimum lot size for controlled activity reduced to 3,000m ³ (instead of 4,000m ³) and insert new restricted discretionary activity minimum lot size of 2,500m ²
Martin John Yuretich (S40)	S40.001	Subdivision	SUB-S1	Oppose	The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone. The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision. With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks. It is correct to protect rural productive potential, but this can be achieved without imposing a total restriction on rural lifestyle properties.	Amend allotment sizes, perhaps with a limited number of allotments of a minimum of 8000m ² or 1ha, then 4ha generally after that. Smaller lot sizes should apply for properties (or parts thereof) that do not consist of highly productive land. Perhaps there should be more focus on the size of the balance parcel - subdividing off 4ha to leave a 10ha balance parcel does not protect productivity, while subdividing 1ha off a 200ha block has next to no effect, especially if the smaller block consists of bush. Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan

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						subdivision.
Joel Vieviorka (S41)	S41.001	Subdivision	SUB-S1	Oppose	<p>The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone.</p> <p>The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision.</p> <p>With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.</p> <p>It is correct to protect rural productive potential, but this can be achieved without imposing a total restriction on rural lifestyle properties.</p>	<p>Amend allotment sizes in the Rural Production zone, perhaps with a limited number of allotments with minimum areas of 8000m² or 1ha, then 4ha generally after that. Smaller lot sizes should apply for properties (or parts thereof) that do not consist of highly productive land.</p> <p>Perhaps there should be more focus on the size of the balance parcel - subdividing off 4ha to leave a 10ha balance parcel does not protect productivity, while subdividing 1ha off a 200ha block has next to no effect, especially if the smaller block consists of bush.</p> <p>Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision.</p>
Andrea Vicki Thomas (S43)	S43.001	Subdivision	SUB-S1	Oppose	<p>Submitter opposes the new sub-division rules requiring a minimum lot size of 8 ha as a discretionary activity in the Rural Production zone, without a management plan. This will restrict the ability to create small rural lots. These blocks are too large for lifestyle blocks and too small to be productive so that a living could be had.</p> <p>This will also no longer allow rural landowners to provide small blocks for young families to build on And enter the property market. Subdividing off 8ha will diminish the productive capacity of a</p>	Retain current minimum lot size of 4ha as a discretionary activity in the Rural Production zone.

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					farm more than a smaller block. With Council struggling to provide urban stormwater, sewerage and water supply and people wanting to live independent of these services it makes sense to allow smaller blocks. In our area in Doubtless Bay we are already in overload and Council is not coping. It is fine to protect rural productive potential. This can still be achieved without imposing a total restriction on rural lifestyle properties.	
Paul O'Connor (S47)	S47.001	Subdivision	SUB-S1	Oppose	The new subdivision rules requiring a minimum lot size of 8ha (without a management plan) will severely restrict the ability to create small rural lots in the rural production zone. effects of this restriction include: no longer allowing farmers to retire in existing home creation of 8ha blocks too large for lifestyle, too small to be productive reduce capacity to reduce dept	amend Rural Production lot sizes to Allow lot size of 8000sqm for a number of lots then 4ha generally after that.
Paul O'Connor (S47)	S47.002	Subdivision	SUB-S1	Oppose	The new subdivision rules requiring a minimum lot size of 8ha (without a management plan) will severely restrict the ability to create small rural lots in the rural production zone. effects of this restriction include: no longer allowing farmers to retire in existing home creation of 8ha blocks too large for lifestyle, too small to be productive reduce capacity to reduce dept	amend rural production allotment sizes to allow smaller lot sizes on less productive land
Paul O'Connor (S47)	S47.003	Subdivision	SUB-S1	Oppose	The new subdivision rules requiring a minimum lot size of 8ha (without a management plan) will severely restrict the ability to create small rural lots in the rural production zone. effects of this restriction include: no longer allowing farmers to retire in existing home creation of 8ha blocks too large for lifestyle, too small to be productive reduce capacity to reduce dept smaller lots provide opportunities for farmers in rural communities	amend rural Production zone allotment sizes to focus on the size of the remaining land - subdividing off smaller parcels (say 1ha) off a 200 ha block has no effect on productivity of small lots.

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Far North Real Estate 2010 Limited (S53)	S53.001	Subdivision	SUB-S1	Oppose	Retain the ODP minimum allotment sizes and do not increase the discretionary activity standard in the Rural Production zone to 8 hectares.	Retain the ODP minimum allotment sizes and do not increase the discretionary activity standard in the Rural Production zone to 8 hectares.
Michael John Winch (S67)	S67.009	Subdivision	SUB-S1	Oppose	I oppose the Discretionary Activity limit of 2 ha in the Rural Lifestyle zone. The Rural Lifestyle zone statement indicates that it is primarily residential in a rural setting. Keeping livestock on a domestic scale is provided for, but is not compulsory. A 2ha site of lawn and gardens is difficult and expensive to maintain without livestock. The purpose of the zone can be achieved with minimum lot sizes of 1 ha (10,000m ²) which still provide 'a sense of spaciousness and rural character' required by the zoning.	Amend the Discretionary Activity limit of 2 ha in the Rural Lifestyle zone to 1 ha (10,000m ²).
Robyn Josephine Baker (S69)	S69.002	Subdivision	SUB-S1	Oppose	A minimum allotment of 8Ha is not practicable. This size is too large for most people wishing to have a lifestyle block. The constant effort / time / expense of keeping the area clear of noxious vegetation and predators is not viable for a small landholder. Economically and socially the Far North needs to be able to attract more residents, being able to offer more lifestyle blocks for those people interested in pursuing a more self-sufficient lifestyle, would be a good way of increasing our population. People from the main population centres in NZ that want to get away from the cramped 'chicken coop' living environment. Land owners should be entitled to further develop their land as they see fit, if it is otherwise unproductive.	Amend SUB-S1 to provide for smaller allotment sizes where the land does not contain highly productive land.
Brian and Katherine Susan Hutching (S71)	S71.001	Subdivision	SUB-S1	Support in part	The submitter considers that the minimum lot sizes in the Rural Production Zone that have already been subdivided down to a size that are not economically viable as rural production units could be further subdivided. There are areas in the existing Rural Production where subdivisions	Amend the provision to allow further subdivision of existing lots if they are below an area between 1 & 2 hectares. The ability to further subdivide these properties to a minimum of 3,000 or 4,000m ² would

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					have occurred, resulting in small lots not suitable for Rural Production purposes. Generally, these properties are residential in nature but on lot sizes larger than standard residential sites, varying between 1 & 2 hectares. The ability to further subdivide these properties to a minimum of 3,000 or 4,000m ² would make land available where subdivision has already occurred, preventing larger allotments from being subdivided and keeping higher density development grouped in areas already developed.	make land available where subdivision has already occurred, preventing larger allotments from being subdivided that are viable as a rural production unit in the Rural Production Zone.
Strand Homes Ltd/Okahu Developments Ltd (S77)	S77.001	Subdivision	SUB-S1	Oppose	<p>The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone.</p> <p>The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision.</p> <p>With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.</p>	Amend allotment sizes for properties (or parts thereof) that do not consist of highly productive land. Reconsider allotment sizes, perhaps with a limited number of allotments of a minimum of 8000sqm or 1ha, then 4ha generally after that. Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision.
Lynley Newport (S112)	S112.001	Subdivision	SUB-S1	Oppose	<p>I am generally not opposed to removing restricted discretionary minimum lot size provisions, EXCEPT for the Rural Production Zone. This zoning has been applied to large portion of the district. The rural nature of the district and the fact that rural and horticultural production accounts a large chunk of the district's economic activity and forms a major part of the district's community, suggests that Council should be spending more time and effort listening to that rural community.</p> <p>The Council has imposed punitive and restrictive</p>	Amend SUB-S1, minimum lot sizes applying to the Rural Production Zone to: Controlled Activity: 40ha; Restricted Discretionary Activity: 12ha; OR up to 3 lots of between 4,000m² and 8,000m² over the period of the life of the District Plan, provided (a) there is a remaining balance of

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					<p>rules to the zone, apparently regardless of a property's productive capacity or existing lot sizes and land use patterns, seemingly not caring that such restrictions are likely to render many marginal productive units uneconomic to continue productive use on because of an inability for the property owner to diversify or reduce debt burden. Where a zone covers such a wide area, and exhibits such a wide range of physical characteristics and lot sizes, a one size fits all approach is not supportable or sustainable for the rural community.</p> <p>Restricting subdivision options across the entire zone will likely have serious negative impact on the rural community:</p> <ul style="list-style-type: none"> - The subdivision regime being proposed will prevent the ability for farmers to retire in their existing homes with a small area of land; - Will prevent farmers and their families from creating small blocks for younger family members to build on and enter the property market; - Reduce the ability of farmers to decrease debt burden; - Discourage diversification. <p>This is a zone that has scope to have more options available, whilst not negatively impacting on overall productive capacity. There are options for subdivision that should and can be available whilst still being consistent with central government requirements to protect highly versatile soils for productive use. There needs to be more options than currently being proposed, designed to enable more case by case assessment of the suitability of the land for subdivision to the minimum lot size specified, e.g. there is very little negative impact on overall productivity of a property if 2 or 3 small lots (4,000-5,000m² lots) are subdivided off, especially if around existing homes and on land not considered highly productive or on highly versatile soils.</p>	<p>12ha; (b) the total area of the three lots does not exceed 2ha; Discretionary Activity: 4ha.</p>

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					<p>I also doubt the logic for applying an 8ha minimum size for discretionary activity lots. This area seems too small to be a stand alone productive unit, yet far too large to be managed for lifestyle /boutique farming. I have submitted elsewhere that there is land in the Rural Production Zone that is likely more appropriately zoned Rural Lifestyle Zone. The latter should be applied in more areas, especially where there are enclaves of rural land already in blocks of less than 8ha.</p> <p>If the Council has concerns about introducing the multiple small lot option as a restricted discretionary activity then it could be introduced as a discretionary activity option. The key should be in the matters to be considered when assessing the land's suitability - location, physical attributes.</p>	
Trevor John Ashford (S146)	S146.001	Subdivision	SUB-S1	Oppose	<p>The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone.</p> <p>The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision.</p> <p>With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.</p>	Amend allotment sizes for properties (or parts thereof) that do not consist of highly productive land. Reconsider allotment sizes, perhaps with a limited number of allotments of a minimum of 8000sqm or 1ha, then 4ha generally after that. Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision.
Shanon Garton (S161)	S161.001	Subdivision	SUB-S1	Oppose	<p>The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone.</p> <p>The reason given for this rule is to protect the productive potential of the rural area, in</p>	Amend allotment sizes for Rural Production properties (or parts thereof) that do not consist of highly productive land. Reconsider allotment sizes, perhaps with a limited number of allotments of a

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					<p>particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision.</p> <p>With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.</p>	<p>minimum of 8000sqm or 1ha, then 4ha generally after that.</p> <p>Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision.</p>
<p>Julianne Sally Bainbridge (S163)</p>	S163.001	Subdivision	SUB-S1	Oppose	<p>The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone.</p> <p>The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision.</p> <p>With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.</p>	<p>Amend allotment sizes for properties (or parts thereof) that do not consist of highly productive land. Reconsider allotment sizes, perhaps with a limited number of allotments of a minimum of 8000sqm or 1ha, then 4ha generally after that.</p> <p>Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision.</p>
<p>Bentzen Farm Limited (S167)</p>	S167.064	Subdivision	SUB-S1	Oppose	<p>The Proposed 40ha minimum allotment size in the Rural Production Zone is opposed and a 20ha average lot size is sought for the following reasons:</p> <p>1. The 40ha minimum follows a productive use of land imperative for the zone which in many instances cannot be achieved and is unsuitable to many steep, coastal and/or bush-clad parts of the district. A smaller 20ha lot size is more able to be managed by owners with non-productive land units such as bush blocks and regenerating land.</p>	<p>Amend SUB-S1 Minimum allotment sizes to a 20ha minimum average allotment size as a controlled activity in the Rural Production Zone.</p> <p>Amend SUB-S1 Minimum allotment sizes to a 8ha minimum average allotment size as a discretionary activity in</p>

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					<p>2. The district has a long-established subdivision pattern through a minimum lot size of 20ha.</p> <p>3. 20ha can be a productive lot.</p> <p>4. An average lot size reduces the risk of arbitrary lot design, enabling the landowner to design a subdivision in a manner that takes the characteristics of the land and its resources into account.</p>	the Rural Production Zone.
Terra Group (S172)	S172.008	Subdivision	SUB-S1	Support	Support the allotment sizes for the Rural Residential Zone. The proposed lot sizes represent an appropriate transition between the Urban and Rural Zones, regarding a transition between urban and rural density and land use effects.	Retain as notified (inferred)
Tristan Simpkin (S174)	S174.001	Subdivision	SUB-S1	Oppose	<p>Opposes that the Rural Production minimum lot sizes have been increased so much. Doubling the size of the controlled activity from 20ha min to 40ha min, and also the discretionary going from 4ha min to 8ha min, also removing all other options for Titles pre-2000.</p> <p>Where is the ability for new titles to be created in rural communities for housing & lifestyle blocks? (because it's clear across the entire district that land zoning has been choked rather than increased). Consider the amount of new housing that has been built across rural communities over the past 15 years (on new Titles - can we really expect all that development to rush into our towns?)</p>	<p>Amend the minimum lot sizes to 4 ha as a discretionary activity (as per Operative District Plan), and insert the following Restricted Discretionary activity rules into the Proposed District Plan (from the Operative District Plan): 3. A maximum of 3 lots in any subdivision, provided that the minimum lot size is 4,000m² and there is at least 1 lot in the subdivision with a minimum lot size of 4ha, and provided further that the subdivision is of sites which existed at or prior to 28 April 2000, or which are amalgamated from titles existing at or prior to 28 April 2000; or 4. A maximum of 5 lots in a subdivision (including the parent lot) where the minimum size of the lots is 2ha, and where the subdivision is</p>

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						created from a site that existed at or prior to 28 April 2000;
Tristan Simpkin (S174)	S174.002	Subdivision	SUB-S1	Support	Support mixed use having no minimum lot size. This allows for townhouse developments and similar in townships like Kerikeri where they would be super beneficial for the working class.	Retain the proposed standard for Mixed Use zone, which has no minimum lot size for Mixed Use Zone.
Tristan Simpkin (S174)	S174.003	Subdivision	SUB-S1	Support in part	Supports Residential Zone having 600m2 and 300m2 as minimum lot sizes, however with townhouse developments likely to become more popular in our town centres, thought should be given to if the minimum as a Discretionary activity should be 200m2. It allows for smaller developments in serviced areas, which is a good improvement. Wastewater and stormwater considerations, as always, would need to be covered as part of resource consent.	Amend the Discretionary minimum lot size for the Residential Zone from 300m2 to 200m2.
Tristan Simpkin (S174)	S174.004	Subdivision	SUB-S1	Support	Engineers, wastewater designer and the Whangarei District have proved that Rural Residential sites can have an effective stormwater and wastewater system on lots as small as 2000m2.	Retain the proposed standard for Rural Residential, which has a minimum lot size of 2000m2.
Russell Protection Society (INC) (S179)	S179.106	Subdivision	SUB-S1	Support in part	support in order to retain the level of protection previously afforded by the General Coastal, coastal living and coastal residential zones in the operative plan	Retain Sub -S1 minimum allotment sizes for Kororareka Russell Township zone, rural production , rural residential, rural lifestyle
Thomson Survey Ltd (S190)	S190.001	Subdivision	SUB-S1	Oppose	<p>I am generally not opposed to removing restricted discretionary minimum lot size provisions, EXCEPT for the Rural Production and Horticultural Zones. This zoning has been applied to large portions of the district. The rural nature of the district and the fact that rural and horticultural production accounts a large chunk of the district's economic activity and forms a major part of the district's community, suggests that Council should be spending more time and effort listening to that rural community.</p> <p>The Council has imposed punitive and restrictive rules to the zones, apparently regardless of a property's productive capacity or existing lot sizes and land use patterns, seemingly not</p>	<p>Amend SUB-S1, minimum lot sizes applying to the Rural Production Zone to:</p> <p>Controlled Activity: 20ha Restricted Discretionary Activity: 12ha; <i>OR in each five year period, up to 2 lots of between 3,000m2 and 1ha over the period of the life of the District Plan;</i> Discretionary Activity: 4ha.</p>

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					<p>caring that such restrictions are likely to render many marginal productive units uneconomic to continue productive use on because of an inability for the property owner to diversify or reduce debt burden. Where a zone covers such a wide area, and exhibits such a wide range of physical characteristics and lot sizes, a one size fits all approach is not supportable or sustainable for the rural community.</p> <p>The objective is to protect agricultural and horticultural production capabilities, as per Objective SUB-04. SUB-04 Subdivision provides for the:</p> <ul style="list-style-type: none"> a. Protection of highly productive land; <p>Where "highly productive land" is defined as: land that is, or has the potential to be, highly productive for farming activities. It includes versatile soils and Land Use Capability Class 4 land and other Land Use Capability classes Land Use Capability, or has the potential to be, highly productive having regard to:</p> <ul style="list-style-type: none"> a. Soil type; b. Physical characteristics; c. Climate conditions; and d. Water availability. <p>Additionally for the Rural Production Zone: SUB-PB Avoid rural lifestyle subdivision in the Rural Production zone unless the subdivision:</p> <ul style="list-style-type: none"> b. will not result in the loss of versatile soils for primary production activities. <p>In the PDP, "versatile soils" are defined as: soils that are Land Use Capability Classes 1c1, 2e1, 2w1, 2w2, 2s1, 3e1, 3e5, 3s1,3s2, 3s4</p>	

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					<p>There are large areas in the rural and horticultural localities where the existing properties are not economic productive units. Many rural properties contain soils with Land Use Capability (LUC) Classes between 4-6. Class 4 LUC soils have low arable land which is only suitable for occasional cropping, and Classes 5-6 are not suitable for arable use. By its own definition, the FNDC does not consider Class 4 LUC soils to be versatile. Classes 5-6 LUC land have productive capabilities limited to pasture or forestry. Soil suitability decreases as the LUC Class numbers increase. The PDP does not make any allowance for subdivision on areas of rural and horticultural lands that contain these soil types with limited productivity.</p> <p>Restricting subdivision options across the entire zone will likely have serious negative impact on the rural community:</p> <ul style="list-style-type: none"> - The subdivision regime being proposed will prevent the ability for farmers and horticulturalists to retire in their existing homes with a small area of land; - Will prevent farmers/horticulturalists and their families from creating small blocks for younger family members to build on and enter the property market; - Reduce the ability of farmers/horticulturalists to decrease debt burden; - Discourage diversification. - Rural and horticultural workers are not always provided on-site accommodation as part of their employment. It is functional and necessary for these workers to be able to source small rural properties which allow them to work more closely to their places of employment, rather than commuting from less suitable urban environments. Not only is this functional and 	

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					<p>necessary, but it is also more environmentally and economically sustainable than longer distance travel, and would comply with policy TRAN-P2 d.</p> <p>The Rural Production and Horticultural zones are areas that have scope to have more options available, whilst not negatively impacting on overall productive capacity. There are options for subdivision that should and can be available whilst still being consistent with central government requirements to protect highly versatile soils for productive use.</p> <p>There needs to be more options than currently being proposed, designed to enable more case by case assessment of the suitability of the land for subdivision to the minimum lot size specified, e.g. there is very little negative impact on overall productivity of a property if 1 or 2 small lots (3,000-lha lots) are subdivided off, especially if around existing homes and on land not considered highly productive or on highly versatile soils.</p> <p>I also doubt the logic for applying an Sha minimum size for discretionary activity lots on the Rural Production Zone. This area seems too small to be a standalone productive unit, yet far too large to be managed for lifestyle/boutique farming, particularly on LUC class soils which have reduced productivity. It would be more appropriate to keep the size at 4ha, and is in keeping with the proposed discretionary size for the new Horticultural Zone, which has similar productive characteristics.</p> <p>I have submitted elsewhere that there is land in the Rural Production Zone that is likely more appropriately zoned Rural Lifestyle Zone. The latter should be applied in more areas,</p>	

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Thomson Survey Ltd (S190)	S190.002	Subdivision	SUB-S1	Oppose	<p>especially where there are enclaves of rural land already in blocks of less than 8ha.</p> <p>I am generally not opposed to removing restricted discretionary minimum lot size provisions, EXCEPT for the Rural Production and Horticultural Zones. This zoning has been applied to large portions of the district. The rural nature of the district and the fact that rural and horticultural production accounts a large chunk of the district's economic activity and forms a major part of the district's community, suggests that Council should be spending more time and effort listening to that rural community.</p> <p>The Council has imposed punitive and restrictive rules to the zones, apparently regardless of a property's productive capacity or existing lot sizes and land use patterns, seemingly not caring that such restrictions are likely to render many marginal productive units uneconomic to continue productive use on because of an inability for the property owner to diversify or reduce debt burden. Where a zone covers such a wide area, and exhibits such a wide range of physical characteristics and lot sizes, a one size fits all approach is not supportable or sustainable for the rural community.</p> <p>The objective is to protect agricultural and horticultural production capabilities, as per Objective SUB-04. SUB-04 Subdivision provides for the: a. Protection of highly productive land;</p> <p>Where "highly productive land" is defined as: land that is, or has the potential to be, highly productive for farming activities. It includes versatile soils and Land Use Capability Class 4 land and other Land Use Capability classes Land Use Capability, or has the potential to be, highly productive having regard to:</p>	<p>insert the following minimum lot size for the Horticultural Zone: Restricted Discretionary Activity: <i>In each five year period, up to 2 lots of between 3,000m² and 1ha over the period of the life of the District Plan;</i> <i>If the Council has concerns about introducing the multiple small lot option as a restricted discretionary activity then it could be introduced as a discretionary activity option. The key should be in the matter to be considered when assessing the land's suitability - location, physical attributes</i></p>

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					<p>a. Soil type; b. Physical characteristics; c. Climate conditions; and d. Water availability.</p> <p>Additionally for the Rural Production Zone: SUB-PB Avoid rural lifestyle subdivision in the Rural Production zone unless the subdivision:</p> <p>b. will not result in the loss of versatile soils for primary production activities.</p> <p>In the PDP, "versatile soils" are defined as: soils that are Land Use Capability Classes lcl, 2e1, 2w1, 2w2, 2s1, 3e1, 3e5, 3s1,3s2, 3s4</p> <p>There are large areas in the rural and horticultural localities where the existing properties are not economic productive units. Many rural properties contain soils with Land Use Capability (LUC) Classes between 4-6. Class 4 LUC soils have low arable land which is only suitable for occasional cropping, and Classes 5-6 are not suitable for arable use. By its own definition, the FNDC does not consider Class 4 LUC soils to be versatile. Classes 5-6 LUC land have productive capabilities limited to pasture or forestry. Soil suitability decreases as the LUC Class numbers increase. The PDP does not make any allowance for subdivision on areas of rural and horticultural lands that contain these soil types with limited productivity.</p> <p>Restricting subdivision options across the entire zone will likely have serious negative impact on the rural community: - The subdivision regime being proposed will prevent the ability for farmers and</p>	

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					<p>horticulturalists to retire in their existing homes with a small area of land;</p> <ul style="list-style-type: none"> - Will prevent farmers/horticulturalists and their families from creating small blocks for younger family members to build on and enter the property market; - Reduce the ability of farmers/horticulturalists to decrease debt burden; - Discourage diversification. - Rural and horticultural workers are not always provided on-site accommodation as part of their employment. It is functional and necessary for these workers to be able to source small rural properties which allow them to work more closely to their places of employment, rather than commuting from less suitable urban environments. Not only is this functional and necessary, but it is also more environmentally and economically sustainable than longer distance travel, and would comply with policy TRAN-P2 d. <p>The Rural Production and Horticultural zones are areas that have scope to have more options available, whilst not negatively impacting on overall productive capacity. There are options for subdivision that should and can be available whilst still being consistent with central government requirements to protect highly versatile soils for productive use.</p> <p>There needs to be more options than currently being proposed, designed to enable more case by case assessment of the suitability of the land for subdivision to the minimum lot size specified, e.g. there is very little negative impact on overall productivity of a property if 1 or 2 small lots (3,000-lha lots) are subdivided off, especially if around existing homes and on land not considered highly productive or on highly versatile soils.</p>	

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					<p>I also doubt the logic for applying an Sha minimum size for discretionary activity lots on the Rural Production Zone. This area seems too small to be a standalone productive unit, yet far too large to be managed for lifestyle/boutique farming, particularly on LUC class soils which have reduced productivity. It would be more appropriate to keep the size at 4ha, and is in keeping with the proposed discretionary size for the new Horticultural Zone, which has similar productive characteristics.</p> <p>I have submitted elsewhere that there is land in the Rural Production Zone that is likely more appropriately zoned Rural Lifestyle Zone. The latter should be applied in more areas, especially where there are enclaves of rural land already in blocks of less than 8ha.</p>	
Jim Longhurst (S224)	S224.002	Subdivision	SUB-S1	Support	I am in support for the subdivision minimum lot size applying to Rural Residential remaining as they are - clause in question SUB-S1 minimum lot sizes.	[Retain SUB-S1 applying to Rural Residential Zone].
Matauri Trustee Limited (S243)	S243.082	Subdivision	SUB-S1	Oppose	<p>The Proposed 40ha minimum allotment size in the Rural Production Zone is opposed and a 20ha average lot size is sought for the following reasons:</p> <ol style="list-style-type: none"> 1. The 40ha minimum follows a productive use of land imperative for the zone which in many instances cannot be achieved and is unsuitable to many steep, coastal and/or bush-clad parts of the district. A smaller 20ha lot size is more able to be managed by owners with non-productive land units such as bush blocks and regenerating land. 2. The district has a long-established subdivision pattern through a minimum lot size of 20ha. 3. 20ha can be a productive lot. 4. An average lot size reduces the risk of arbitrary lot design, enabling the landowner to design a subdivision in a manner that takes the 	<p>Amend SUB-S1 Minimum allotment sizes to a 20ha minimum average allotment size as a controlled activity in the Rural Production Zone.</p> <p>Amend SUB-S1 Minimum allotment sizes to a 8ha minimum average allotment size as a discretionary activity in the Rural Production Zone.</p>

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					characteristics of the land and its resources into account.	
Willowridge Developments Limited (S250)	S250.012	Subdivision	SUB-S1	Support in part	The 40ha allotment size proposed for the RPROZ is considered to be overly conservative, with insufficient consideration of other lot sizes that could reasonably achieve the sought outcomes by the zone. With respect to the RLZ, it is unclear why the proposed minimum lot size for controlled activity subdivision has been selected. To 4ha controlled activity subdivision is inconsistent with the residential density control provided in the RLZ Chapter.	Review and consider a regional consistency with neighbouring Council's for minimum lot sizes, in particular the provision of a 20ha minimum lot size in the RPROZ as a controlled activity. Amend to align the minimum lot size of the RLZ with the residential intensity control of the RLZ Chapter. Retain the minimum lot size for subdivision in the Settlement Zone as notified.
IDF Developments Limited (S253)	S253.008	Subdivision	SUB-S1	Oppose	The 40ha allotment size as a controlled activity is not considered as the most appropriate provision to meet Part 2 of the RMA considering the Rural Production zone makes up approximately 65% of all land in the District. A more appropriate density should be enabled, or other techniques proposed (outside of a management plan approach/environmental benefit approach) that benefits larger landholdings to still enable housing development whilst retaining large balance farm allotments. The 8ha allotment size enables better management of the land resources and is supported.	Delete the proposed minimum allotment size of 40ha as a controlled activity in the Rural Production zone (inferred)
IDF Developments Limited (S253)	S253.013	Subdivision	SUB-S1	Support	The 40ha allotment size as a controlled activity is not considered as the most appropriate provision to meet Part 2 of the RMA considering the Rural Production zone makes up approximately 65% of all land in the District. A more appropriate density should be enabled, or other techniques proposed (outside of a management plan approach/environmental benefit approach) that benefits larger landholdings to still enable housing development whilst retaining large balance farm allotments. The 8ha allotment size enables better	Retain the discretionary activity allotment size of 8ha in the Rural Production zone (inferred).

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					management of the land resources and is supported.	
Arahia Burkhardt Macrae (S255)	S255.001	Subdivision	SUB-S1	Oppose	Oppose 40ha minimum allotment size as a controlled activity standard in Rural Production Zone, in particular for land that is not classed/mapped as highly productive land by NPS Highly Productive Land 2022.	Amend standard to 20ha minimum lot size as a controlled activity in the Rural Production Zone.
Te Hiku Community Board (S257)	S257.010	Subdivision	SUB-S1	Oppose	We do not support the large title sizes in the rural zone. We submit that subdivision should allow lots to 4ha or smaller, and that the subdivision of smaller lots around existing houses be provided for.	Amend standard SUB-S1 in relation to the Rural Production Zone, to generally allow lots of 4ha, and allow lots less than 4ha around existing houses.
Te Hiku Community Board (S257)	S257.020	Subdivision	SUB-S1	Support in part	Support a higher density of subdivision as a restricted discretionary activity instead of a discretionary activity in the residential zone, as these areas should be encouraged for more housing and amenity value is of less of a concern to the provision of housing in these areas that do not have landscape or heritage overlays. It should be restricted discretionary to ensure that the assessment criteria that neighbours can have weighting over as an affected party is limited, to ensure that more housing can be provided with less likelihood of a hearing, as there should be a strong push to enable more housing in urban centres.	Retain in SUB-S1 the 600m2 minimum lot size in the General Residential zone as a controlled activity. Amend SUB-S1, to provide for subdivision down to 300m2 lot size in General Residential Zone as a restricted discretionary activity, with matters of discretion derived from the matters of control listed in rule SUB-R3.
Amber Hookway (S261)	S261.004	Subdivision	SUB-S1	Oppose	The increased lot size for Rural Production Zone appears to be double the previous size. I believe this is an unreasonable size increase. This no longer allows owners to retire in their existing homes with a smaller area of land and reduces the ability for rural landowners to provide small blocks for family members to build on and enter the property market	Amend to reinstate the Operative District Plan rule for minimum lot size on the Rural Production Zone (Table 13.7.2.1), with 20 ha minimum lot size as a controlled activity.
Ti Toki Farms Limited (S262)	S262.005	Subdivision	SUB-S1	Support	The submitter considers the minimum allotment size in the Light Industrial Zone enables better management of the land resources and facilitates social and economic wellbeing within the district.	Retain the minimum lot size within the Light Industrial Zone.

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Wilson Hookway (S264)	S264.004	Subdivision	SUB-S1	Support	The increased lot size for Rural Production Zone appears to be double the previous size. I believe this is an unreasonable size increase. This no longer allows owners to retire in their existing homes with a smaller area of land and reduces the ability for rural landowners to provide small blocks for family members to build on and enter the property market.	Amend to reinstate the Operative District Plan rule for minimum lot sizes on the Rural Production Zone (Table 13.7.2.1).
Manu Burkhardt Macrae (S279)	S279.002	Subdivision	SUB-S1	Oppose	Opposes minimum lot size of 40ha in Rural Production Zone as a controlled activity, in particular for land which is not highly productive land as described in the NPS Highly Productive Land 2022.	Amend minimum allotment size to 20 ha in the Rural Production Zone, as a controlled activity (as per the Operative District Plan), in particular for land which is not highly productive land as described in the NPS Highly Productive Land 2022.
Tristan Simpkin (S286)	S286.002	Subdivision	SUB-S1	Oppose	Nearly all of the land that was zoned Coastal Living throughout the whole District (minimum discretionary lot size 5000m2) has been changed to Rural Lifestyle (minimum discretionary lot size 2ha which is 4x the size of the current rule). This affects the following townships/areas: Ahipara, Opononi, Koutu, Houhora, Pukenui, Taipa, Cable Bay, Coopers Beach, Hihi, Whangaroa, Mahinepua, Wainui, Blue Penguin/Fernbird, Rangitane River Park, Kerikeri Inlet/Wharau Rd , and a lot of land around Russell & Paihia & Orongo Bay. Each of the above townships/areas would have land in or on the fringes of it severely reduced in development and growth potential, which is exactly what the Far North coastal towns need. Submitter opposes this rezoning and can only conclude that no one has actually thought about the negative implications this will have on the growth of our coastal towns. All this land that could be subdivided down currently into 5,000m2 lots, with the new Rural Lifestyle zone can only be as small as 20,000m2 (2ha). Who wants 2ha with their bach by the beach? The Far North needs to be growing, not shrinking, so we need to provide more properties	Either 1) Rural lifestyle zone discretionary minimum lotsize needs to be 5,000m2 - so at least the potential of the land does not get worse than it is at present; or 2)(preferred) all the land that was zoned Coastal Living be rezoned to RuralResidential, and let the Coastal environment rules cover any coastal issues (also see S286.001)

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					for people to live on. Further to that, the current Coastal Living zoned land has already had a reasonable amount of development under the current zoning, so why don't we intensify where houses are already, which means our Rural & Horticultural land can be further preserved from development?	
Danielle Hookway (S309)	S309.004	Subdivision	SUB-S1	Oppose	The increased minimum lot size appears to be double the previous size. I believe this is an unreasonable size increase. This no longer allows owners to retire in their existing homes with a smaller area of land and reduces the ability for rural landowners to provide small blocks for family members to build on and enter the property market.	Amend standard SUB-S1 to retain the previous rules for the Rural Production Zone identified under Table 13.7.2.1 Minimum Lot Sizes (i) Rural Production Zone.
Lianne Kennedy (S310)	S310.004	Subdivision	SUB-S1	Oppose	The increased minimum lot size appears to be double the previous size. I believe this is an unreasonable size increase. This no longer allows owners to retire in their existing homes with a smaller area of land and reduces the ability for rural landowners to provide small blocks for family members to build on and enter the property market.	Amend standard SUB-S1 to retain the previous rules for the Rural Production Zone identified under Table 13.7.2.1 Minimum Lot Sizes (i) Rural Production Zone.
Allen Hookway (S311)	S311.004	Subdivision	SUB-S1	Oppose	The increased minimum lot size appears to be double the previous size. I believe this is an unreasonable size increase. This no longer allows owners to retire in their existing homes with a smaller area of land and reduces the ability for rural landowners to provide small blocks for family members to build on and enter the property market.	Amend standard SUB-S1 to retain the previous rules for the Rural Production Zone identified under Table 13.7.2.1 Minimum Lot Sizes (i) Rural Production Zone.
Morgan Horsford (S312)	S312.001	Subdivision	SUB-S1	Oppose	The proposed minimum lot size in Rural Production Zones will prove detrimental to the character and eventual survival of rural communities. The overall guidelines of limiting fragmentation, loss of productive land are important but proposed changes will have significant negative effects on rural communities. Proposed minimum lot sizes will prevent older generations stepping activity and being able to maintain connection to area by dividing off peice of land. It will limit other family members living in	Amend SUB-S1 for Rural Production as follows: Controlled activity: 40ha 4ha where the land type, ability to provide on-site services such as power & water supply & waste disposla, existing land use, and residual property size are suitable. Discretionary activity: 8ha 2ha,

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					same community. It will affect ability for local schools to have sufficient numbers. Should also have mechanisms to restrict ability of small block owners or tenants to impede rights of rural production businesses. Minimum lot sizes are too restrictive and will harm sense of place, community's cultural, social, environmental and economic wellbeing and have effects on business operation benefits.	1ha or 0.5ha as appropriate, where the land type, ability to provide on-site services such as power & water supply & waste disposal, existing land use, and residual property size are suitable.
Two M Investments Limited (S317)	S317.034	Subdivision	SUB-S1	Support	The submitter considers that the standard SUB-S1 minimum allotment size as it applies to the Horticulture Zone reflects an appropriate size to enable horticultural development on a site or allowing non-horticultural development to be undertaken without interfering with adjoining horticultural operations.	Retain the standard SUB-S1 minimum allotment size as it applies to the Horticulture zone.
Mangonui Haulage (S318)	S318.005	Subdivision	SUB-S1	Support	The submitter considers that the minimum lot size in the Light Industrial Zone enables better management of the land resources and facilitates social and economic well being.	Retain the minimum lot size in the Light Industrial Zone.
FNR Properties Limited (S319)	S319.003	Subdivision	SUB-S1	Oppose	The submitter opposes SUB-S1 provisions relating to the minimum allotment size in the Rural Production Zone as it will be increasing the controlled activity lot size from 20 ha to 40 ha and limiting in the zone and is heavy handed.	Amend SUB-S1 minimum allotment size in the Rural Production Zone to reduce the minimum allotment size and/or provide for more options as a controlled, restricted discretionary and discretionary activity.
FNR Properties Limited (S334)	S334.002	Subdivision	SUB-S1	Oppose	Do not support the RPZ provisions relating to minimum allotment size. Such a substantial reduction in the permitted residential intensity threshold in the RPZ is extremely heavy-handed and will result in significant adverse effects on the socio-economic wellbeing of the Far North District. Reasons are as follows: Does not recognise the immediate need for more housing in the district. Imposing such restrictions on residential intensity will only contribute further to the current housing crisis that is being observed both locally and nationwide. Providing more options for residential intensity	Amend SUB-S1 Minimum Allotment Sizes (Rural Production) and reduce the minimum lot sizes in the RPZ, and/or to provide for more options for subdivision in the RPZ as a Controlled, Restricted Discretionary, and Discretionary Activity.

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					as a Controlled, Restricted Discretionary, and Discretionary Activity would be more appropriate as this will enable such development to occur in the RPZ while providing for case by case consideration of any proposed residential activity within the context of the subject site and immediate surrounding environment (as opposed to a 'one size fits all' approach).	
Waipapa Pine Limited and Adrian Broughton Trust (S342)	S342.019	Subdivision	SUB-S1	Support	The allotment size enables better management of the land resources and facilities social and economic well-being within the district.	retain the proposed minimum allotment size within the heavy industrial zone
Sapphire Surveyors Limited (S348)	S348.001	Subdivision	SUB-S1	Oppose	<p>The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone.</p> <p>The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision.</p> <p>With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.</p> <p>It is correct to protect rural productive potential, but this can be achieved without imposing a total restriction on rural lifestyle properties.</p>	<p>Amend allotment sizes in the Rural Production zone, perhaps with a limited number of allotments with minimum areas of 8000m² or 1ha, then 4ha generally after that. Smaller lot sizes should apply for properties (or parts thereof) that do not consist of highly productive land.</p> <p>Perhaps there should be more focus on the size of the balance parcel - subdividing off 4ha to leave a 10ha balance parcel does not protect productivity, while subdividing 1ha off a 200ha block has next to no effect, especially if the smaller block consists of bush.</p> <p>Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision.</p>
Neil Constructio	S349.017	Subdivision	SUB-S1	Oppose	A better outcome in these circumstances is to utilise the land more efficiently for rural residential use, adding much needed housing to	amend SUB-S1 to provide for lots of 3,000m ² as a controlled activity and 2,000m ² as a discretionary activity

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n Limited (S349)					Kerikeri in a way that does not impose any burden on the community in terms of providing or funding infrastructure.	in both the Rural Lifestyle Zone and the Rural Residential Zone
Waka Kotahi NZ Transport Agency (S356)	S356.091	Subdivision	SUB-S1	Oppose	<p>Waka Kotahi note that the objectives and policies of the plan support a range of housing outcomes including higher density development. However, the minimum lot size for the General Residential zone is 600m2 as a controlled activity. Waka Kotahi considers that this is a large site size that does not encourage housing choice or adequately support transport outcomes particularly in and around Far North's townships and more urbanised areas. Waka Kotahi considers that there may be a number of options to enable greater housing density in the right locations and we would welcome the opportunity to discuss these with Council. Options include a combination of:</p> <ul style="list-style-type: none"> - Reducing the minimum lot size as a controlled activity, - Introducing a medium density residential zone in appropriate locations - Introducing an enabling consent pathway for higher density residential development rather than as a Discretionary Activity 	Amend to enable higher density housing in the General Residential zone as Waka Kotahi considers that a minimum lot size of 600m2 for the general residential zone as a controlled activity will not achieve good transport outcomes.
Sean Frieling (S357)	S357.010	Subdivision	SUB-S1	Oppose	<p>The new subdivision rules will severely restrict the ability to create small rural lots in the rural production zone.</p> <p>The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and the less productive land when it comes to subdivision.</p> <p>It is correct to protect rural productive potential, but this can be achieved without imposing a total restriction on rural lifestyle properties. We do not support the large title sizes in the rural zone. We submit that subdivision should allow lots to 4ha</p>	Amend standard SUB-S1 in relation to the Rural Production Zone, to generally allow lots of 4ha, and allow lots less than 4ha around existing houses.

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					or smaller, and that the subdivision of smaller lots around existing houses be provided for.	
Sean Frieling (S357)	S357.020	Subdivision	SUB-S1	Support in part	<p>We support a higher density of housing in the new multi-unit development rules.</p> <p>We support a higher density of housing in the residential zones</p> <p>We support a higher density of subdivision as a restricted discretionary activity instead of a discretionary activity in the residential zone, as these areas should be encouraged for more housing and amenity value is of less of a concern to the provision of housing in these areas that do not have landscape or heritage overlays. We feel that it should be restricted discretionary to ensure that the assessment criteria that neighbours can have weighting over as an affected party is limited, to ensure that more housing can be provided with less likelihood of a hearing, as there should be a strong push to enable more housing in urban centres.</p> <p>The rules should only be allowed in areas where all infrastructure has been upgraded and maintained to allow for the maximum development potential under this rule and subdivision rules.</p>	Retain in SUB-S1 the 600m2 minimum lot size in the General Residential zone as a controlled activity.
Sean Frieling (S357)	S357.021	Subdivision	SUB-S1	Support	<p>We support a higher density of housing in the new multi-unit development rules.</p> <p>We support a higher density of housing in the residential zones</p> <p>We support a higher density of subdivision as a restricted discretionary activity instead of a discretionary activity in the residential zone, as these areas should be encouraged for more housing and amenity value is of less of a concern to the provision of housing in these areas that do not have landscape or heritage overlays. We feel that it should be restricted discretionary to ensure that the assessment criteria that neighbours can have weighting over as an affected party is limited, to ensure that more housing can be provided with less</p>	Amend SUB-S1, to provide for subdivision down to 300m2 lot size in General Residential Zone as a restricted discretionary activity, with matters of discretion derived from the matters of control listed in rule SUB-R3.

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					likelihood of a hearing, as there should be a strong push to enable more housing in urban centres. The rules should only be allowed in areas where all infrastructure has been upgraded and maintained to allow for the maximum development potential under this rule and subdivision rules.	
Leah Frieling (S358)	S358.010	Subdivision	SUB-S1	Oppose	We do not support the large title sizes in the Rural Production zone. We submit that subdivision should allow lots to 4ha or smaller, and that the subdivision of smaller lots around existing houses be provided for. With Council struggling to provide urban amenities and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks. It is correct to protect rural productive potential, but this can be achieved without imposing a total restriction on rural lifestyle properties.	Amend standard SUB-S1 in relation to the Rural Production Zone, to generally allow lots of 4ha, and allow lots less than 4ha around existing houses.
Leah Frieling (S358)	S358.020	Subdivision	SUB-S1	Support in part	We support a higher density of subdivision as a restricted discretionary activity instead of a discretionary activity in the residential zone, as these areas should be encouraged for more housing and amenity value is of less of a concern to the provision of housing in these areas that do not have landscape or heritage overlays. We feel that it should be restricted discretionary to ensure that the assessment criteria that neighbours can have weighting over as an affected party is limited, to ensure that more housing can be provided with less likelihood of a hearing, as there should be a strong push to enable more housing in urban centres.	Retain in Standard SUB-S1 the 600m2 minimum lot size in the General Residential zone as a controlled activity
Leah Frieling (S358)	S358.021	Subdivision	SUB-S1	Support in part	We support a higher density of subdivision as a restricted discretionary activity instead of a discretionary activity in the residential zone, as these areas should be encouraged for more housing and amenity value is of less of a concern to the provision of housing in these	Amend standard SUB-S1, to provide for subdivision down to 300m2 lot size in General Residential Zone as a restricted discretionary activity, with matters of discretion derived from the matters

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					areas that do not have landscape or heritage overlays. We feel that it should be restricted discretionary to ensure that the assessment criteria that neighbours can have weighting over as an affected party is limited, to ensure that more housing can be provided with less likelihood of a hearing, as there should be a strong push to enable more housing in urban centres.	of control listed in rule SUB-R3
Northland Regional Council (S359)	S359.015	Subdivision	SUB-S1	Support in part	Support the creation of zones for horticulture use and processing and the rationale being to protect the productive capacity of areas around Kerikeri and Waipapa, especially given soil quality and water supply available to support such use and the pressure from fragmentation and reverse sensitivity. We see this as being consistent with direction in the NPS for Highly Productive Land. However, we note controlled activity lot size for subdivision in the Horticulture zone is 10ha and discretionary activity lot size is 4ha. Given the proximity to Waipapa and Kerikeri, demand for lifestyle blocks in these areas is likely to be high and we suggest that larger minimum lot sizes and/or more restrictive activity status for development would provide better protection for these areas	Amend the thresholds applying to the Horticulture zone in standard SUB-S1, to increase the lot sizes.
Northland Regional Council (S359)	S359.018	Subdivision	SUB-S1	Support in part	Providing for subdivision down to 4ha in the Horticulture zone has potential to fragment highly productive land (e.g. enable lifestyle/rural residential use) and compromise objectives to avoid reverse sensitivity issues (spray use is a particular concern and generates a significant number of incidents for NRC). Suggest any subdivision resulting in lots sizes below 10ha should trigger a non-complying activity status consistent with Section 3.8 of NPS-HPL "Avoiding subdivision of highly productive land".	Amend the thresholds applying to the Horticulture zone in standard SUB-S1, to require resource consent as a non-complying activity where lots are less than 10ha.
Far North District Council (S368)	S368.004	Subdivision	SUB-S1	Support in part	Correction: The onsite wastewater option for both Mixed Use and Light Industrial zones needs to be removed as they are both 'urban' as defined in the PDP. This was incorrectly applied, the intention of the PDP in urban zoned land is	Amend SUB-S1 Mixed Use 2,000m² onsite wastewater disposal 250m ² reticulated wastewater disposal

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					the availability of adequate development infrastructure.	Light Industrial 2,000m ² onsite wastewater disposal 500m ² reticulated wastewater disposal
Linda Gigger (S370)	S370.005	Subdivision	SUB-S1	Support	The allotment size enables better management of the land resources and facilities social and economic well being within the district	Retain the proposed minimum allotment size within Standard SUB-S1 as relates to the Light Industrial Zone
Rua Hatu Trust (S377)	S377.001	Subdivision	SUB-S1	Oppose	The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone. The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision. With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.	Amend allotment sizes for properties (or parts thereof) that do not consist of highly productive land. Reconsider allotment sizes, perhaps with a limited number of allotments of a minimum of 8000sqm or 1ha, then 4ha generally after that. Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision.
Marshall Investments Trustee (2012) Limited (S378)	S378.007	Subdivision	SUB-S1	Support	The allotment size enables better management of the land resources and facilities social and economic well-being within the district.	Retain the proposed minimum allotment size within the Heavy Industrial Zone.
LD Family Investments Limited (S384)	S384.005	Subdivision	SUB-S1	Support	The allotment size enables better management of the land resources and facilities social and economic well being within the district.	Retain the proposed minimum allotment size within the Light Industrial Zone.
Sarah Ballantyne and Dean	S386.018	Subdivision	SUB-S1	Support in part	While Ballantyne & Agnew recognise the importance and purpose of the RPROZ, particularly the need to protect highly versatile	Review and amend minimum lot sizes, in particular the provision of a 20ha minimum lot size in the

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Agnew (S386)					soils, manage the fragmentation of land for productive purposes, and avoid reverse sensitivity effects arising, it is considered that all of these matters can be achieved at lot sizes smaller than 40ha. At a minimum, FNDC should consider alignment neighbouring Council's (i.e. the Whangārei District Plan RPROZ provisions) to achieve region wide consistency under the RPS. Finally, with respect to the RLZ, it is unclear why the proposed minimum lot size for controlled activity subdivision has been selected. 4ha controlled activity subdivision is inconsistent with the residential density control provided in the RLZ Chapter. It is common practice to align these controls to provide consistent outcomes across land use and subdivision controls.	RPROZ as a controlled activity, to ensure regional consistency. Amend the minimum lot size of the RLZ to align with the residential intensity control of the RLZ Chapter.
Sean Jozef Vercammen (S395)	S395.001	Subdivision	SUB-S1	Oppose	The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone. The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision. With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.	Amend allotment sizes for properties (or parts thereof) that do not consist of highly productive land. Reconsider allotment sizes, perhaps with a limited number of allotments of a minimum of 8000sqm or 1ha, then 4ha generally after that. Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision.
Braedon & Cook Limited (S401)	S401.003	Subdivision	SUB-S1	Support in part	The PDP minimum lot sizes for subdivision in the Rural Living zone are not considered to provide for an efficient use of land and resources. A 4ha minimum lot size for subdivision will result in landholdings that are too small to be used for commercially viable productive uses, yet also too large for typical lifestyle purposes. This will also result in a	Amend the Rural Lifestyle zone thresholds in Standard SUB-S1 as follows: Controlled activity 4ha 2ha Discretionary activity 2ha 1ha

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					cadastral pattern that will not provide a sufficient supply of rural-residential development to service demand in the Far North District. It is therefore the submitters opinion that these lot sizes should be reduced.	
Meridian Farm Ltd (S403)	S403.003	Subdivision	SUB-S1	Oppose	The PDP minimum lot sizes for subdivision in the RLZ are not considered to provide for an efficient use of land and resources. A 4ha minimum lot size for subdivision will result in landholdings that are too small to be used for commercially viable productive uses, yet also too large for typical lifestyle purposes. This will also result in a cadastral pattern that will not provide a sufficient supply of rural-residential development to service demand in the Far North District. It is therefore the submitters opinion that these lot sizes should be reduced.	Amend the minimum lot size criteria in SUB-S1 in the subdivision chapter for the Rural Living Zone to reduce it from 4ha (controlled activity) and 2ha (discretionary activity) to 2ha (controlled activity) and 1ha (discretionary activity).
Kerry-Anne Smith (S410)	S410.001	Subdivision	SUB-S1	Oppose	The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone. The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision. With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.	Amend allotment sizes for properties (or parts thereof) that do not consist of highly productive land. Reconsider allotment sizes, perhaps with a limited number of allotments of a minimum of 8000sqm or 1ha, then 4ha generally after that. Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision.
Roger Myles Smith (S411)	S411.001	Subdivision	SUB-S1	Oppose	The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone. The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the	Amend allotment sizes for properties (or parts thereof) that do not consist of highly productive land. Reconsider allotment sizes, perhaps with a limited number of allotments of a minimum of 8000sqm or 1ha, then 4ha generally

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					majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision. With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.	after that. Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision.
Roman Catholic Bishop of the Diocese of Auckland (S413)	S413.006	Subdivision	SUB-S1	Oppose	There are only a few vacant Residential Zoned serviced sites in Kaikohe and in the District. Reducing the current operative standard of 600m ² for controlled activity subdivision to 500m ² in the Proposed Plan will provide certainty of affordable residential sites.	Amend SBS1 - Minimum Allotment Sizes for the General Residential Zone to: <ul style="list-style-type: none"> Controlled Activity - 600m² 500m² Discretionary Activity - 300m² 250m²
LMD Planning Consultancy (S415)	S415.001	Subdivision	SUB-S1	Oppose	Subdivision standards proposed for the Rural Production zone are too restrictive, particularly as applicable to Sacred Heart Catholic Church premises at 867 State Highway 10, Waitaruke (Part Waihapa 3A1 Blk).	Amend Standard SUB-S1 to reduce the thresholds for subdivision in the Rural Production Zone as follows: Controlled activity - 40ha 20ha Discretionary activity - 8ha 4ha
Kathleen Jones (S417)	S417.001	Subdivision	SUB-S1	Oppose	The proposed increase of lot sizes may lead to an increase in productive land being taken out of production, noting even 2ha lots are too large for many homeowners to have as house lots resulting in productive land being wasted. Also the minimum lot sizes for both permitted and discretionary activities do not provide provision for housing lots for family members.	Amend the site areas for rural production zone so they are reduced and insert provision for 0.5ha to 1ha lots.
LMD Planning Consultancy (S419)	S419.006	Subdivision	SUB-S1	Oppose	There are only a few vacant residential zoned serviced sites in Kaikohe and in the District. Reducing the current operative standard of 600m ² for controlled activity subdivision to 500m ² in the Proposed Plan will provide certainty of affordable residential sites.	Amend Standard SUB-S1 as it applies to the General Residential zone as follows: <ul style="list-style-type: none"> Controlled Activity - 600m² 500m²

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						<ul style="list-style-type: none"> Discretionary Activity - 300m² 250m²
LMD Planning Consultancy (S419)	S419.007	Subdivision	SUB-S1	Oppose	Increasing the controlled activity subdivision Rule standard from 20ha to 40ha is unfair on cash strapped rural property owners during these tough economic times.	<p>Amend Standard SUB-S1 as it applies to the Rural Production zone as follows:</p> <ul style="list-style-type: none"> Controlled Activity - 40ha 20ha Discretionary Activity - 8ha 4ha
Northland Federated Farmers of New Zealand (S421)	S421.177	Subdivision	SUB-S1	Support in part	<p>Federated Farmers supports rule SUB-R3 in general but does support the proposed 40ha rural production-controlled standard in SUB-S1. The 40ha requirement is overtly limiting and would require farmers to sacrifice more productive land for subdivision. This will leave less productive farmland on the working farm and more productive land on a smaller lifestyle property.</p> <p>We seek that the 40ha requirement in SUB-S1 is amended to the existing 20ha. This will ensure that landowners have suitable options available to react to economic, environmental and farm succession changes as required.</p>	Amend the minimum allotment size threshold for land zoned Rural Production in Standard SUB-S1 (inferred), decreasing it from 40ha to 20ha
Kapiro Residents Association (S427)	S427.015	Subdivision	SUB-S1	Oppose	Land fragmentation is a significant problem - we seek strong policies/rules specifically to prevent/avoid fragmentation of land in the horticulture zone, all rural zones and coastal areas.	Amend subdivision provisions that specify minimum lot sizes for all rural zones for a breach of these minimum sizes should be a non-complying activity [inferred].
FNR Properties Limited (S437)	S437.004	Subdivision	SUB-S1	Support	The provision is supported as it represents a positive change for 142 and 134 North Road, Kaitaia and surrounding properties.	Retain Rule SUB-S1 Minimum Allotment Sizes as notified.
John Joseph and Jacqueline Elizabeth	S439.001	Subdivision	SUB-S1	Oppose	<p>The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone.</p> <p>The reason given for this rule is to protect the</p>	Amend allotment sizes for properties (or parts thereof) that do not consist of highly productive land. Reconsider allotment sizes, perhaps with a limited number of

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Matthews (S439)					productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision. With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.	allotments of a minimum of 8,000m or 1ha, then 4ha generally after that. Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision.
LJ King Ltd (S464)	S464.001	Subdivision	SUB-S1	Oppose	The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone. The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision. With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.	Amend allotment sizes for properties (or parts thereof) that do not consist of highly productive land. Reconsider allotment sizes, perhaps with a limited number of allotments of a minimum of 8000sqm or 1ha, then 4ha generally after that. Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision
LJ King Ltd (S464)	S464.021	Subdivision	SUB-S1	Oppose	We do not support the large title sizes in the rural zone and submit that the subdivision of smaller lots around existing houses be provided for.	Amend SUB-S1 to allow for lots less than 4ha around existing houses in the Rural Production Zone.
LJ King Ltd (S464)	S464.026	Subdivision	SUB-S1	Support	Not stated.	Retain the 600m2 minimum lot size in the General Residential Zone as a controlled activity.
LJ King Ltd (S464)	S464.027	Subdivision	SUB-S1	Support in part	Areas should be encouraged for more housing and amenity value is of less of a concern to the provision of housing in these areas that do not	Amend SUB-S1 to provide for subdivision down to 300m2 lot size in General Residential Zone as a

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					have landscape or heritage overlays. We feel that it should be restricted discretionary to ensure that the assessment criteria that neighbours can have weighting over as an affected party is limited, to ensure that more housing can be provided with less likelihood of a hearing, as there should be a strong push to enable more housing in urban centres.	restricted discretionary activity, with matters of discretion derived from the matters of control listed in rule SUB-R3.
Helmut Friedrich Paul Letz and Angelika Eveline Letz (S470)	S470.001	Subdivision	SUB-S1	Oppose	<p>The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone.</p> <p>The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision.</p> <p>With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.</p>	<p>Amend allotment sizes for properties (or parts thereof) that do not consist of highly productive land. Reconsider allotment sizes, perhaps with a limited number of allotments of a minimum of 8000sqm or 1ha, then 4ha generally after that.</p> <p>Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision.</p>
Michael Foy (S472)	S472.010	Subdivision	SUB-S1	Oppose	<p>The new subdivision rules, requiring a minimum lot size of 8ha (without a management plan) will severely restrict the ability to create small rural lots in the rural production zone. The effects of this restriction include:</p> <ul style="list-style-type: none"> - A reduction in vitality for rural communities - no longer allowing farmers to retire in their existing homes with a small area of land - the creation of 8ha blocks, which are too large for lifestyle blocks and too small to be productive - no longer allowing for the creation of appropriately sized and desirable lifestyle blocks - reduce the ability for rural landowners to provide small blocks for young family members to build on and enter the property market (this is contrary to Council policies in relation to 	<p>Amend standard SUB-S1 in relation to the Rural Production Zone, to generally allow lots of 4ha, and allow lots less than 4ha around existing houses</p>

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					affordable housing reduced capacity for farmers to decrease their debt burdens by subdividing off small block of land that do not significantly add to the productivity of their farm. Where it is necessary to reduce debt by subdivision, subdividing off 8ha will diminish the productive capacity of the farm more than a smaller block.	
Michael Foy (S472)	S472.020	Subdivision	SUB-S1	Support	We support a higher density of subdivision as a restricted discretionary activity instead of a discretionary activity in the residential zone, as these areas should be encouraged for more housing and amenity value is of less of a concern to the provision of housing in these areas that do not have landscape or heritage overlays. We feel that it should be restricted discretionary to ensure that the assessment criteria that neighbours can have weighting over as an affected party is limited, to ensure that more housing can be provided with less likelihood of a hearing, as there should be a strong push to enable more housing in urban centres	Retain in SUB-S1 the 600m2 minimum lot size in the General Residential zone as a controlled activity.
Michael Foy (S472)	S472.021	Subdivision	SUB-S1	Support in part	We support a higher density of subdivision as a restricted discretionary activity instead of a discretionary activity in the residential zone, as these areas should be encouraged for more housing and amenity value is of less of a concern to the provision of housing in these areas that do not have landscape or heritage overlays. We feel that it should be restricted discretionary to ensure that the assessment criteria that neighbours can have weighting over as an affected party is limited, to ensure that more housing can be provided with less likelihood of a hearing, as there should be a strong push to enable more housing in urban centres	Amend SUB-S1, to provide for subdivision down to 300m2 lot size in General Residential Zone as a restricted discretionary activity, with matters of discretion derived from the matters of control listed in rule SUB-R3. This rule should only be allowed in areas where all infrastructure has been upgraded and maintained to allow for the maximum development potential under this rule and subdivision rules These areas could be shown on one of the FNDC GIS Maps
David Lesley	S474.001	Subdivision	SUB-S1	Support in part	The site (110 Waipapa West Road, Waipapa) has a current rural zoning (Rural Production), yet	Amend subdivision minimum allotment table to recognise

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Penberthy and Elena Lvovna Belyakova and Ors (S474)					is used for residential purposes having a residential unit and a minor residential unit. This submission proposes to maintain the proposed Horticulture (Special Purpose) Zoning but to modify Standard SUB-S1 to recognise those allotments that are currently significantly less than that anticipated and those that currently have no horticultural productivity; while ensuring reverse sensitivity effects are appropriately considered and provided for.	allotments which are under 1.5 hectares in size at the Operative date of the Plan Change have subdivisional provision to 5000m ² as a Controlled Activity and 3000m ² as a Non-Complying Activity, or other consequential zoning and provision amendments to achieve this relief.
Elbury Holdings (S485)	S485.001	Subdivision	SUB-S1	Oppose	The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone. The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision. With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.	Amend allotment sizes for properties (or parts thereof) that do not consist of highly productive land. Reconsider allotment sizes, perhaps with a limited number of allotments of a minimum of 8000sqm or 1ha, then 4ha generally after that. Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision.
Elbury Holdings (S485)	S485.022	Subdivision	SUB-S1	Oppose	We do not support the large title sizes in the rural zone and submit that the subdivision of smaller lots around existing houses be provided for.	Amend standard SUB-S1 in relation to the Rural Production Zone, to generally allow lots of 4ha, and allow lots less than 4ha around existing houses.
Elbury Holdings (S485)	S485.025	Subdivision	SUB-S1	Support	N/A	Retain the 600m ² minimum lot size in the General Residential Zone as a controlled activity.
Elbury Holdings (S485)	S485.026	Subdivision	SUB-S1	Support in part	Areas should be encouraged for more housing and amenity value is of less of a concern to the provision of housing in these areas that do not have landscape or heritage overlays. We feel	Amend SUB-S1 to provide for subdivision down to 300m ² lot size in General Residential Zone as a restricted discretionary activity, with

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					that it should be restricted discretionary to ensure that the assessment criteria that neighbours can have weighting over as an affected party is limited, to ensure that more housing can be provided with less likelihood of a hearing, as there should be a strong push to enable more housing in urban centres.	matters of discretion derived from the matters of control listed in rule SUB-R3.
Northland Planning and Development 2020 Limited (S502)	S502.082	Subdivision	SUB-S1	Support in part	<p>The economic viability in relation to productive areas for primary production varies a great deal depending on whether the use is for horticulture, dairy farming or sheep and beef grazing to name a few. It is also noted that smaller horticultural properties are more economically viable when they have the benefit of versatile soils, access to water for irrigation and access to a workforce. This is evident not only in Kerikeri but also in areas such as Pukenui and Kaitaia.</p> <p>2.4. The above lot sizes are sought to reflect the diversity of primary production throughout the entire district as there are many areas that have access to an aquifer or water irrigation which can support primary production within a smaller parcel of land. It is acknowledged within the Rural Environment Economic Analysis Update Report that there are a number of smaller established horticultural land parcels that are likely to support viable primary productive uses. In addition to this not all land that is zoned as Rural Production contains Highly Versatile Soils, and not all sites that are zoned as Rural Production can be utilised or are suitable for a productive purpose. For this reason, not all sites are set aside as a productive farming unit which would require an allotment size of 40ha or more. As middle ground we seek to add in a Restricted Discretionary activity status of 8ha. This aligns with the Rural Environment Economic Analysis report which confirms that horticultural activities can effectively be undertaken on land of 7ha in area. This leaves an additional hectare to establish a dwelling and associated sheds and infrastructure. While the plan has proposed a</p>	Amend SUB-S1 to provide for: Rural Production Controlled activity 20ha, Restricted discretionary activity 8ha and Discretionary activity 4ha Rural lifestyle discretionary activity 1ha

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					<p>horticultural zone for Kerikeri and Waipapa to give effect to this, no consideration to horticultural activities within the rest of the district has been undertaken. Having this as an enabling option ensures other horticultural areas in the District are able to achieve similar outcomes to Kerikeri. The 4ha allotment size as a discretionary activity enables less productive land to be utilised for activities such as lifestyle development with small scale subsistence living. This ensures small scale lifestyle development is available in more rural areas for people who either want to retire and remove the family house from the farm, or take off an area which is not productive on the main farming unit, to enable a family to establish a dwelling and have a couple of sheep or cattle with gardens, where a less intensive use would be beneficial for the environment in terms of pugging and erosion. As a discretionary activity any proposal requires the full range of effects to be considered through the resource consent process and the decision remains up to Council to consider whether approval should be granted.</p> <p>We support the inclusion of the Rural Residential zone which enables Discretionary allotment sizes of up to 2000m2.</p> <p>Within the Section 32 report, Section 1.3, it is stated that the primary purpose of the zone is to enable people to undertake a residential activity, however the size of the lot sizes give people the option of growing their own food or having a horse or stock at a domestic scale, while still enabling farming on larger lots. It is considered that the above-mentioned activities can occur on allotments of 1 hectare in size and greater as is evident when driving around the Far North District.</p> <p>The Section 32 report then goes on to explain that reducing fragmentation of the zone is a priority as well as reducing the pressure on providing reticulated infrastructure. Once again,</p>	

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					<p>it is considered lot sizes of 1 hectare are more than capable of catering for infrastructure onsite, without creating any adverse effects, as has been provided for in many instances. The majority of these areas are also not located within areas which are serviced by reticulated infrastructure, such that providing such infrastructure would not even be a consideration nor an expectation.</p> <p>Providing rural amenity and avoiding reverse sensitivity effects are a main driver for the more restrictive lot sizes, however, it is considered that providing for lot sizes of 1 hectare as a Discretionary Activity will maintain and enhance the rural amenity of the zone, while providing sites which are able to be effectively managed by the owners as a small productive/lifestyle lot.</p>	
Elbury Holdings (S519)	S519.001	Subdivision	SUB-S1	Oppose	<p>The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the Rural Production Zone. These effects include a reduction in vitality for rural communities, farmers unable to retire in their existing homes on a smaller area of land or provide smaller blocks for family members, 8ha is too large for lifestyle blocks and too small to be productive, and reduced capacity for farmers to decrease debt. As a retiring farmer I would like to cut off my home with a small area surrounding it and not have ha's that need management of weeds, pest, livestock etc.</p>	<p>Amend allotment sizes for properties (or parts thereof) that do not consist of highly productive land. Reconsider allotment sizes, perhaps with a limited number of allotments of a minimum of 8000sqm or 1ha, then 4ha generally after that.</p> <p>Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision.</p>
Elbury Holdings (S519)	S519.022	Subdivision	SUB-S1	Oppose	<p>We do not support the large title sizes in the rural zone and submit that the subdivision of smaller lots around existing houses be provided for.</p>	<p>Amend standard SUB-S1 in relation to the Rural Production Zone, to generally allow lots of 4ha, and allow lots less than 4ha around existing houses</p>
Elbury Holdings (S519)	S519.025	Subdivision	SUB-S1	Support	N/A	<p>Retain the 600m2 minimum lot size in the General Residential Zone as a controlled activity.</p>

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Elbury Holdings (S519)	S519.026	Subdivision	SUB-S1	Support in part	Areas should be encouraged for more housing and amenity value is of less of a concern to the provision of housing in these areas that do not have landscape or heritage overlays. We feel that it should be restricted discretionary to ensure that the assessment criteria that neighbours can have weighting over as an affected party is limited, to ensure that more housing can be provided with less likelihood of a hearing, as there should be a strong push to enable more housing in urban centres.	Amend SUB-S1 to provide for subdivision down to 300m2 lot size in General Residential Zone as a restricted discretionary activity, with matters of discretion derived from the matters of control listed in rule SUB-R3.
Geoffrey Raymond Lodge (S540)	S540.001	Subdivision	SUB-S1	Oppose	The Council has imposed punitive and restrictive rules to the zones, apparently regardless of a property's productive capacity or existing lot sizes and land use patterns, seemingly not caring that such restrictions are likely to render many marginal productive units uneconomic to continue productive use on because of an inability for the property owner to diversity or reduce debt burden. Where a zone covers such a wide area, and exhibits such a wide range of physical characteristics and lot sizes, a one size fits all approach is not supportable or sustainable for the rural community.	Amend SUB-S1 minimum lot sizes applying to the Rural Production Zone to: Controlled Activity: 40 ha 20ha Restricted Discretionary Activity: 12ha; or in each five year period, up to 2 lots of between 3,000m2 and 1ha over the period of the life of the District Plan Discretionary Activity: 8ha 4ha
Geoffrey Raymond Lodge (S540)	S540.002	Subdivision	SUB-S1	Oppose	The Council has imposed punitive and restrictive rules to the zones, apparently regardless of a property's productive capacity or existing lot sizes and land use patterns, seemingly not caring that such restrictions are likely to render many marginal productive units uneconomic to continue productive use on because of an inability for the property owner to diversity or reduce debt burden. Where a zone covers such a wide area, and exhibits such a wide range of physical characteristics and lot sizes, a one size fits all approach is not supportable or sustainable for the rural community.	Insert the following minimum lot size for the Horticultural Zone: Restricted Discretionary: In each five year period, up to 2 lots of between 3,000m2 and 1 ha over the period of the life of the District Plan.
Elbury Holdings (S541)	S541.001	Subdivision	SUB-S1	Oppose	The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone. The reason	Amend allotment sizes for properties (or parts thereof) that do not consist of highly productive land. Reconsider allotment sizes,

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					given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision. With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.	perhaps with a limited number of allotments of a minimum of 8000sqm or 1ha, then 4ha generally after that. Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision.
Elbury Holdings (S541)	S541.020	Subdivision	SUB-S1	Oppose	We do not support the large title sizes in the rural zone. We submit that subdivision should allow lots to 4ha or smaller, and that the subdivision of smaller lots around existing houses be provided for.	Amend standard SUB-S1 in relation to the Rural Production Zone, to generally allow lots of 4ha, and allow lots less than 4ha around existing houses.
Elbury Holdings (S541)	S541.023	Subdivision	SUB-S1	Support in part	Areas should be encouraged for more housing and amenity value is of less of a concern to the provision of housing in these areas that do not have landscape or heritage overlays. We feel that it should be restricted discretionary to ensure that the assessment criteria that neighbours can have weighting over as an affected party is limited, to ensure that more housing can be provided with less likelihood of a hearing, as there should be a strong push to enable more housing in urban centres.	Retain the 600m2 minimum lot size in the General Residential Zone as a controlled activity/Amend SUB-S1, to provide for subdivision down to 300m2 lot size in General Residential Zone as a restricted discretionary activity, with matters of discretion derived from the matters of control listed in Rule SUB-R3.
LJ King Limited (S543)	S543.001	Subdivision	SUB-S1	Oppose	The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone. The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision.	Amend allotment sizes for properties (or parts thereof) that do not consist of highly productive land. Reconsider allotment sizes, perhaps with a limited number of allotments of a minimum of 8000sqm or 1ha, then 4ha generally after that. Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision

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					With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.	
LJ King Limited (S543)	S543.021	Subdivision	SUB-S1	Oppose	We do not support the large title sizes in the rural zone and submit that the subdivision of smaller lots around existing houses be provided for	Amend standard SUB-S1 in relation to the Rural Production Zone, to generally allow lots of 4ha, and allow lots less than 4ha around existing houses.
LJ King Limited (S543)	S543.024	Subdivision	SUB-S1	Support in part	Not stated	Retain the 600m2 minimum lot size in the General Residential Zone as a controlled activity
LJ King Limited (S543)	S543.025	Subdivision	SUB-S1	Support in part	Areas should be encouraged for more housing and amenity value is of less of a concern to the provision of housing in these areas that do not have landscape or heritage overlays. We feel that it should be restricted discretionary to ensure that the assessment criteria that neighbours can have weighting over as an affected party is limited, to ensure that more housing can be provided with less likelihood of a hearing, as there should be a strong push to enable more housing in urban centres	Amend SUB-S1 to provide for subdivision down to 300m2 lot size in General Residential Zone as a restricted discretionary activity, with matters of discretion derived from the matters of control listed in rule SUB-R3
Kelvin Richard Horsford (S544)	S544.001	Subdivision	SUB-S1	Oppose	The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone. The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision. With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas	Amend allotment sizes for properties (or parts thereof) that do not consist of highly productive land. Reconsider allotment sizes, perhaps with a limited number of allotments of a minimum of 8000sqm or 1ha, then 4ha generally after that. Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision

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					without too much land to care for, it makes sense to allow small rural blocks	
LJ King Limited (S547)	S547.001	Subdivision	SUB-S1	Oppose	<p>The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone.</p> <p>The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision.</p> <p>With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks</p>	<p>Amend allotment sizes for properties (or parts thereof) that do not consist of highly productive land. Reconsider allotment sizes, perhaps with a limited number of allotments of a minimum of 8000sqm or 1ha, then 4ha generally after that.</p> <p>Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision</p>
LJ King Limited (S547)	S547.021	Subdivision	SUB-S1	Oppose	We do not support the large title sizes in the rural zone and submit that the subdivision of smaller lots around existing houses be provided for	Amend standard SUB-S1 in relation to the Rural Production Zone, to generally allow lots of 4ha, and allow lots less than 4ha around existing houses.
LJ King Limited (S547)	S547.024	Subdivision	SUB-S1	Support in part	not stated	Retain the 600m2 minimum lot size in the General Residential Zone as a controlled activity
LJ King Limited (S547)	S547.025	Subdivision	SUB-S1	Support in part	Areas should be encouraged for more housing and amenity value is of less of a concern to the provision of housing in these areas that do not have landscape or heritage overlays. We feel that it should be restricted discretionary to ensure that the assessment criteria that neighbours can have weighting over as an affected party is limited, to ensure that more housing can be provided with less likelihood of a hearing, as there should be a strong push to enable more housing in urban centres	Amend SUB-S1 to provide for subdivision down to 300m2 lot size in General Residential Zone as a restricted discretionary activity, with matters of discretion derived from the matters of control listed in rule SUB-R3
Ian Diarmid Palmer (S556)	S556.001	Subdivision	SUB-S1	Not Stated	The term 'site' is used approximately 1200 times in the text of the PDP including in relation to rules prescribing, for example how many	Amend the word 'allotment' as used in SUB-S1 to 'site' and/or otherwise clarify that the areas listed in SUB-

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					<p>residential units are allowed on a 'site' and the area required to be allocated on a 'site' for each residential unit.</p> <p>However, the standard related to the minimum size of parcels of land (SUB-S1) is titled "Minimum allotment sizes" [emphasis added]. The term 'allotment' appears only 85 times in the PDP text.</p> <p>Given a 'site' (by the definition used) may be comprised of multiple 'titles' (as defined) and a 'title' may be comprised of multiple 'allotments' (as defined) the use of the word 'allotment' in SUB-S1 creates ambiguity and possibly unintended consequences. For example, a subdivision may be proposed of a 8 hectare 'site' into two 4 hectares 'sites' in seeming compliance with SUB-S1 for Rural Lifestyle Controlled subdivision. However, one of the two newly proposed 4 hectare 'sites' may evenly straddle a legal Road (e.g. an unformed Paper Road). LINZ will insist that the new title for this second new 'site' be comprised of two 'allotments' (of 2 hectares each) which will be drawn as such on the Land Transfer and subsequent Deposited Plan. This however could be seen as not then meeting the 4 hectare threshold per SUB-S1.</p>	<p>S1 are intended to be measures of 'site' areas.</p> <p>Alternatively many of the places in the PDP where the word 'site' is used should be changed to use the word 'allotment'.</p>
Te Rūnanga o Ngāti Rēhia (S559)	S559.034	Subdivision	SUB-S1	Support in part	<p>Given the proximity to Waipapa and Kerikeri, demand for lifestyle blocks in these areas is likely to be high. The amendment would provide better protection for these areas.</p>	<p>Amend SUB-S1 to provide for larger minimum lot sizes and/or a more restrictive activity status for development in the Horticulture Zone (inferred).</p>
Kāinga Ora Homes and Communities (S561)	S561.051	Subdivision	SUB-S1	Support in part	<p>Kāinga Ora does not support minimum lot sizes for residential subdivision. A minimum building platform size is a more efficient means to ensure residential outcomes are achieved.</p>	<p>Delete minimum allotment sizes for residential subdivision from SUB S1</p>
Rodney S Gates and Cherie R	S569.001	Subdivision	SUB-S1	Oppose	<p>The new subdivision rules, requiring a minimum lot size of 8ha (without a Management Plan) will severely restrict the ability to create small rural lots in the rural production zone.</p>	<p>Amend allotment sizes for properties (or parts thereof) that do not consist of highly productive land. Reconsider allotment sizes,</p>

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Gates (S569)					<p>The reason given for this rule is to protect the productive potential of the rural area, in particular, highly productive land. However, the majority of land in the Far North District does not come under this category, and the PDP does not distinguish between highly productive land and less productive land when it comes to subdivision.</p> <p>With Council struggling to provide urban amenities (sewerage, water supply and stormwater) and people wanting to live independent of these services in the rural areas without too much land to care for, it makes sense to allow small rural blocks.</p>	perhaps with a limited number of allotments of a minimum of 8000sqm or 1ha, then 4ha generally after that. Consequential amendments to RPROZ-R3 Residential activity and SUB-R7 Management plan subdivision
Trent Simpkin (S28)	S28.001	Subdivision	SUB-S2	Oppose	<p>Opposes that the Rural Production minimum lot sizes have been increased so much. Doubling the size of the controlled activity from 20ha min to 40ha min, and also the discretionary going from 4ha min to 8ha min (from the Operative District Plan), and also removing all other options for Titles pre 2000. Where is the new land coming from? (because it's clear across the entire district that land zoning has been choked rather than increased). Some other councils are allowing Rural 'clusters' similar to what the old DP allowed. This means that New Zealanders can still buy a small rural block of land to live on rather than having a massive 8Ha lot to keep (or not keep!)</p>	Insert a 'cluster option' for rural areas to be subdivided - suggest 4 x 4,000m ² sections per parent lot (which means the bulk of the farm is retained in one large lot). Amend minimum lot sizes to 20 ha minimum (as a controlled activity), and 4 ha minimum (as a discretionary activity).
Lynley Newport (S111)	S111.001	Subdivision	SUB-S2	Oppose	<p>Why must the Council insist on working in squares? What is wrong with a rectangular building platform, or trapezoid, or even triangular? The insistence on square shapes is a nonsense and leads to unnecessary extra 'breaches' having to be addressed. The requirement includes the words ' does not encroach into the permitted activity boundary setbacks for the relevant zone etc, so surely this is enough to ensure the building envelope is of sufficient size. There is no justifiable need to be square.</p>	Amend SUB-S2 as follows: Allotments created must be able to accommodate a building envelope of the minimum area specified below, which does not encroach into the permitted activity boundary setbacks for the relevant zone or into an area that does not allow a building to be located 4m x 14m 196m², 30m x 30m 900m²

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Thomson Survey Ltd (S189)	S189.001	Subdivision	SUB-S2	Oppose	The submitter opposes SUB-S2 Requirements for building platforms for each allotment being a square building platform. 30m x 30m building platform area is unnecessarily large.	Amend SUB-S2 as follows: Allotments created must be able to accommodate a building envelope of the minimum area specified below, which does not encroach into the permitted activity boundary setbacks for the relevant zone or into an area that does not allow a building to be located. Replace 14m x 14m with 150m2 Replace 30m x30m with 300m2
Neil Construction Limited (S349)	S349.018	Subdivision	SUB-S2	Oppose	A better outcome in these circumstances is to utilise the land more efficiently for rural residential use, adding much needed housing to Kerikeri in a way that does not impose any burden on the community in terms of providing or funding infrastructure.	Amend to reduce building platform dimensions under SUB-S2 to 20m x 20m in the Rural Lifestyle Zone and the Rural Residential Zone
Fire and Emergency New Zealand (S512)	S512.034	Subdivision	SUB-S2	Support in part	Seek explicit reference of emergency response access needs.	Amend SUB-S2 a. compatibility with the pattern of the surrounding subdivision, land use activities, and access arrangements (including emergency response access);
Kāinga Ora Homes and Communities (S561)	S561.052	Subdivision	SUB-S2	Support in part	Kerikeri town is of sufficient urban size and predicted growth to support a medium density residential zone around the immediate town centre. Kāinga Ora request that the application of SUB-S2 be extended to include the proposed Medium Density Residential zone.	Amend SUB-S2 be to include its application to the proposed Medium Density Residential zone. Amend SUB-S2 to include a residential building platform dimension of: 8m x 15m
Lynley Newport (S110)	S110.001	Subdivision	SUB-S3	Oppose	I do not believe the Council has the legal right to force connection to a Council service through a planning instrument such as a District plan options should be available to the subdivider and future lot owners	Amend SUB - S3 all new allotments shall be provided with the ability to connect to a safe potable water supply with an adequate capacity for the respective

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						potential land uses. This may be either by way of a connection to a Council reticulated water supply system, or by way of an on-site water supply system
Terra Group (S172)	S172.009	Subdivision	SUB-S3	Support	Support this standard, as it will achieve positive outcomes for the proposed zone.	Retain as notified (inferred)
Terra Group (S172)	S172.026	Subdivision	SUB-S3	Support	Support this standard as it will achieve positive outcomes for the proposed zone (note: submitter duplicates submission point in their submission 172.009).	Retain as notified (inferred)
Thomson Survey Limited (S207)	S207.001	Subdivision	SUB-S3	Oppose	Do not believe Council has the legal right to force connections to a Council service through a planning instrument such as a District Plan. Options should be available to the subdivider and future lot owners	Amend clause 1 of Standard SUB-S3 as follows: All new allotments shall have be provided with the ability to connect to a safe potable water supply with a an adequate an adequate capacity that is adequate for the anticipated anticipated respective respective potential land uses. This may be either by way of a connection to a Council reticulated water supply system, or by way of an on-site water supply system.
Far North District Council (S368)	S368.087	Subdivision	SUB-S3	Support in part	If a subdivision is not able to connect to a reticulated water system, the way the rule is currently drafted it could be interpreted as requiring that there be a system installed or be provided as a condition of consent (i.e s224(c)) prior to issue of any new title. The intention is that at subdivision it shall be demonstrated that a water supply system can be provided. Redraft more aligned with the standard for wastewater SU B-S5 (2)	Amend SUB-S3 3. Where a connection to Council's reticulated water systems is not available all allotments shall be provided with a means to must provide a water supply system.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Fire and Emergency New Zealand (S512)	S512.035	Subdivision	SUB-S3	Support	Fire and Emergency support the explicit reference to allotments requiring water supplies in line with SNZ PAS 4509:2008.	retain SUB-S3
Kiwi Fresh Orange Company Limited (S554)	S554.009	Subdivision	SUB-S3	Support	Not stated.	Retain Standard as notified
Haigh Workman Limited (S215)	S215.033	Subdivision	SUB-S4	Support in part	<p>We support standard SUB-S4 (1) requiring increases in stormwater runoff to be avoided or mitigated for the 10% AEP rainfall event. This is the industry standard for stormwater management and is consistent with Regional Plan rules.</p> <p>We oppose standard SUB-S4 (2) requiring compliance with Council's Engineering Standards April 2022 unless the Engineering Standards are amended. As discussed in our comments on the Engineering Standards (appended), the stormwater provisions of the Engineering Standards contain technical errors, are unnecessarily prescriptive and/or are inconsistent with industry standards and Regional Plan rules.</p>	Amend SUB- S4 to delete (2)
Ngā Tai Ora - Public Health Northland (S516)	S516.058	Subdivision	SUB-S4	Not Stated	Standards SUB-S4 and SUB-S5 require all stormwater management and wastewater disposal to be in accordance with the Far North District Council Environmental Engineering Standards. Ngā Tai Ora are concerned that these Engineering Standards do not ensure sustainable, safe and efficient management of stormwater and wastewater disposal. As a catch all standards these reference the entire Engineering Standards, resulting in potential unclear and unmeasurable rules.	<p>Amend the relationship of the District Plan to the Environmental Engineering Standards to:</p> <p>(a) Ensure the District Plan requires the delivery of infrastructure in a manner that achieves sustainable, safe and efficient provision of infrastructure.</p> <p>(b) Ensure referencing of the Environmental Engineering Standards in the District Plan is appropriate and results in clear and measurable rules.</p> <p>(c) Cross-referencing to Environmental Engineering Standards is consistent across all</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						chapters.
Kiwi Fresh Orange Company Limited (S554)	S554.010	Subdivision	SUB-S4	Support	Not stated	Retain standard as notified
Lynley Newport (S110)	S110.002	Subdivision	SUB-S5	Oppose	I do not believe the Council has the legal right to force connection to a Council service through a planning instrument such as a District plan options should be available to the subdivider and future lot owners	Amend SUB-S5 All allotments shall be provided with either the ability to connect to a Council owned reticulated wastewater scheme, a privately owned reticulated wastewater scheme constructed pursuant to a Discharge Consent, or a means of treating and disposing of wastewater within the site area of the allotment
Kairos Connection Trust and Habitat for Humanity Northern Region Ltd (S138)	S138.010	Subdivision	SUB-S5	Support in part	As all allotments must connect where services are available, clarification is required to assist in determining the availability of connections to Council owned reticulated wastewater scheme. This is because the matters for discretion include the 'capacity of, and impacts on the existing reticulated wastewater disposal system. The existing capacity of urban wastewater systems is unknown so it would be difficult to confirm that there is capacity without an extensive and expensive investigation.	Amend Standard SUB-S5 - clarifying this standard that requires that where a connection to Council owned reticulated wastewater scheme is available, all allotments must connect.
Terra Group (S172)	S172.010	Subdivision	SUB-S5	Support	Support this standard, as it will achieve positive outcomes for the proposed zone.	Retain as notified (inferred)
Thomson Survey Limited (S207)	S207.002	Subdivision	SUB-S5	Oppose	Do not believe Council has the legal right to force connections to a Council service through a planning instrument such as a District Plan. Options should be available to the subdivider and future lot owners	Amend clause 1 of Standard SUB-S5 as follows: Where a connection to Council owned reticulated wastewater scheme is available, all allotments must connect All allotments shall be provided with either the ability to connect to a Council owned

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						reticulated wastewater scheme, a privately owned reticulated wastewater scheme constructed pursuant to a Discharge Consent, or a means of treating and disposing of wastewater within the site area of the allotment.
Haigh Workman Limited (S215)	S215.034	Subdivision	SUB-S5	Support in part	We support standard SUB-S4 (1) and (2) requiring provision for wastewater disposal. We oppose standard SUB-S4 (3) requiring compliance with Council's Engineering Standards April 2022 unless the Engineering Standards are amended. Engineering Standard Clause 5.1.5.3 paragraph (a) should be deleted. The lot area is a District Plan matter and is not relevant to the engineering standards. Many existing lots with on-site wastewater disposal are less than 3000m2 and would not comply with this provision. The requirement to comply with Regional Plan rules for wastewater disposal (paragraph b) ensures on-site wastewater disposal is appropriate.	Amend SUB-S5 to delete (3)
Ngā Tai Ora - Public Health Northland (S516)	S516.059	Subdivision	SUB-S5	Not Stated	Standards SUB-S4 and SUB-S5 require all stormwater management and wastewater disposal to be in accordance with the Far North District Council Environmental Engineering Standards. Ngā Tai Ora are concerned that these Engineering Standards do not ensure sustainable, safe and efficient management of stormwater and wastewater disposal. As a catch all standards these reference the entire Engineering Standards, resulting in potential unclear and unmeasurable rules.	Amend the relationship of the District Plan to the Environmental Engineering Standards to: (a) Ensure the District Plan requires the delivery of infrastructure in a manner that achieves sustainable, safe and efficient provision of infrastructure. (b) Ensure referencing of the Environmental Engineering Standards in the District Plan is

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						appropriate and results in clear and measurable rules. (c) Cross-referencing to Environmental Engineering Standards is consistent across all chapters.
Kiwi Fresh Orange Company Limited (S554)	S554.011	Subdivision	SUB-S5	Support	Not stated	Retain standard as notified
Lynley Newport (S109)	S109.001	Subdivision	SUB-S6	Oppose	The submitter opposes the requirement in SUB-S6 to provide connections to the boundary for conventional land line telecommunications or grid power as technology and people's preferences have moved beyond these.	Amend SUB-S6 (inferred) as follows: Add new clause 3: 3. Or alternative means, provided that where it is proposed to rely on alternatives to the reticulated services outlined above, the alternative shall be capable of providing the same level of service as conventional reticulated services.
Reuben Wright (S178)	S178.005	Subdivision	SUB-S6	Support in part	Rule SUB-S6 includes reference to provision of telecommunications via fibre or copper connection. A requirement for a telecommunication service should no longer be required for any subdivision where technology now allows for various telecommunication providers to offer new technology allowing for wireless connection in any location. Any rule requiring telecommunication services for subdivision should be removed.	Delete requirement for a telecommunication service for subdivisions.
Chorus New Zealand Ltd (S278)	S278.001	Subdivision	SUB-S6	Support in part	Chorus supports the intent to require fibre for newly subdivided allotments where available, but the proposed wording could create ambiguity as	Amend SUB-S6 as follows: 1. Telecommunications through an open access fibre network.

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					to the type of connection to be provided particularly in greenfield developments where no service is currently provided.	Telecommunications i. fibre where it is available or; ii. Copper where fibre is not available.
<p>Spark New Zealand Trading Limited and Vodafone New Zealand Limited (S517)</p>	S517.003	Subdivision	SUB-S6	Support in part	<p>Rules SUB-R1, SUB-R3, SUB-R5 and SUB-R6 all require telecommunication connection via compliance with Standard SUB-S6. Non-compliance becomes a restricted discretionary. Rule SUB-R6 requires connection not clear if there is a requirement to provide telecommunication connections beyond the urban and Rural residential and Horticulture Processing Facility zones as Rural and Rural Production zones are not mentioned in Rule SUB-R6.</p> <p>In addition, Rural residential and Horticulture Processing Facility zones are zones that would be normally under R1 be serviced via wireless connectivity. Spark and Vodafone are submitting to amend Standard SUB-S6 to recognise wireless connectivity in rural areas.</p>	<p>Amend Standard SUB-S6 to apply to all zones as follows: Connections shall be provided at the boundary of the site area of the allotment for:</p> <ol style="list-style-type: none"> 1. telecommunications <ol style="list-style-type: none"> i. Fibre where it is available; or ii. Copper where fibre is not available Where fibre is not available Mobile/Wireless. which includes satellite: oriii. Where fibre or mobile/wireless connectivity is not available copper VDSL is minimum connection standard: andiv. The applicant shall provide with any subdivision consent application of written confirmation from a telecommunication network operator confirming that connection: andV. At the time of subdivision. sufficient land for telecommunications. transformers and any associated ancillary services must be set aside. For a subdivision that creates more than 15 lots, proof of

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>consultation with the telecommunications network utility operators may will be required.</p> <p>2. Electricity supply through the local electricity distribution network.</p> <p>Note: This standard does not apply to allotments for a utility, road, reserve or for access purposes.</p>
Kāinga Ora Homes and Communities (S561)	S561.053	Subdivision	SUB-S6	Support in part	Kerikeri town is of sufficient urban size and predicted growth to support a medium density residential zone around the immediate town centre.	Amend SUB-S6 to include a Medium Density Residential zone.
Terra Group (S172)	S172.012	Subdivision	SUB-S7	Support	Support this standard, as it will achieve positive outcomes for the proposed zone.	Retain as notified (inferred)
Far North District Council (S368)	S368.086	Subdivision	SUB-S7	Support in part	The last sentence is in (4) unclear as to purpose and definition and is not considered necessary for the purpose of applying this rule. Recommend removing 'Centre line easements shall apply when the line is privately owned.'	Amend SUB-S7 4. Service easements, whether in gross or for private purposes, with sufficient width to permit maintenance, repair or replacement of services. Centre line easements shall apply when the line is privately owned:
Martin John Yuretich (S40)	S40.009	Subdivision	SUB-S8	Support in part	Council already has enough reserves around that they are unable to maintain, so by vesting the land in Council via an esplanade reserve removes it from the care and stewardship of the adjacent landowner. At least with esplanade	Amend standard SUB-S8 to insert the option of creating an esplanade strip

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					strips there is a duty (or at least the opportunity) for the landowner to look after the area, since it is still included in his/her title.	
Joel Vieviorka (S41)	S41.009	Subdivision	SUB-S8	Support	Council already has enough reserves around that they are unable to maintain, so by vesting the land in Council via an esplanade reserve removes it from the care and stewardship of the adjacent landowner. At least with esplanade strips there is a duty (or at least the opportunity) for the landowner to look after the area, since it is still included in his/her title.	Amend standard SUB-S8 to insert the option of creating an esplanade strip
Strand Homes Ltd/Okahu Developments Ltd (S77)	S77.008	Subdivision	SUB-S8	Support in part	Section 77 of the RMA 1991 allows Council to create a rule that allows for an esplanade strip, but the PDP only has allowance for esplanade reserves. In some instances, esplanade strips are more suitable, so this option should be available. Council already has enough reserves around that they are unable to maintain, so by vesting the land in Council via an esplanade reserve removes it from the care and stewardship of the adjacent landowner. At least with esplanade strips there is a duty (or at least the opportunity) for the landowner to look after the area, since it is still included in his/her title.	Amend to insert the option of creating an esplanade strip in the subdivision chapter (inferred)
Lynley Newport (S108)	S108.001	Subdivision	SUB-S8	Support in part	The submitter considers that the provision of an esplanade strip can sometimes be a better option than an esplanade reserve e.g: if the river changes course or the MHWS line changes. It can also be preferable to leave the ownership of the land with the landowner rather than transferring the land to the Council.	Amend SUB-S8 to allow for the option of providing an esplanade strip.
Trevor John Ashford (S146)	S146.009	Subdivision	SUB-S8	Support in part	Council already has enough reserves around that they are unable to maintain, of by vesting the land in Council via an esplanade reserves removes it from the care and stewardship of the adjacent landowner. At least with esplanade strips there is a duty (or at least the opportunity) for the land owner to look after the area, since it is still included in his/her title.	Amend SUB-S8 to include the option of creating an esplanade strip in this rule.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Shanon Garton (S161)	S161.008	Subdivision	SUB-S8	Support in part	Section 77 of the RMA 1991 allows Council to create a rule that allows for an esplanade strip, but the PDP only has allowance for esplanade reserves. In some instances, esplanade strips are more suitable, so this option should be available. Council already has enough reserves around that they are unable to maintain, so by vesting the land in Council via an esplanade reserve removes it from the care and stewardship of the adjacent landowner. At least with esplanade strips there is a duty (or at least the opportunity) for the landowner to look after the area, since it is still included in his/her title.	Amend to include the option of creating an esplanade strip in the subdivision chapter (inferred)
Julianne Sally Bainbridge (S163)	S163.012	Subdivision	SUB-S8	Support in part	Council already has enough reserves around that they are unable to maintain, of by vesting the land in Council via an esplanade reserves removes it from the care and stewardship of the adjacent landowner. At least with esplanade strips there is a duty (or at least the opportunity) for the landowner to look after the area, since it is still included in his/her title.	Amend SUB-S8 to include the option of creating an esplanade strip in this rule.
Bentzen Farm Limited (S167)	S167.065	Subdivision	SUB-S8	Support	The rule appropriately aligns with the esplanade reserve requirements of the RMA 1991. A lake of 8ha is suitably defined in the rule, with esplanades around smaller lakes likely of no or of limited public benefit and a significant imposition on landowners.	Retain Rule SUB-S8
Setar Thirty Six Limited (S168)	S168.065	Subdivision	SUB-S8	Support	The rule appropriately aligns with the esplanade reserve requirements of the RMA 1991. A lake of 8ha is suitably defined in the rule, with esplanades around smaller lakes likely of no or of limited public benefit and a significant imposition on landowners	Retain Standard SUB-S8
Terra Group (S172)	S172.011	Subdivision	SUB-S8	Support	Support this standard, as it will achieve positive outcomes for the proposed zone.	Retain as notified (inferred)
The Shooting Box Limited (S187)	S187.057	Subdivision	SUB-S8	Support	The rule appropriately aligns with the esplanade reserve requirements of the RMA 1991. A lake of 8ha is suitably defined in the rule, with esplanades around smaller lakes likely of no or of limited public benefit and a significant imposition on landowners.	Retain Rule SUB-S8.

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Thomson Survey Limited (S208)	S208.001	Subdivision	SUB-S8	Support in part	The Council fails to recognise that an esplanade strip is sometimes a better option. There are instances where the water feature is better suited to an esplanade strip boundary that changes with the water feature, e.g. if the river changes course or the MHWS line changes. It is also often preferable to leave the ownership of the land with the landowner as opposed to transferring the land to the Council.	Amend Standard SUB-S8 to allow for the option of providing an Esplanade Strip.
Matauri Trustee Limited (S243)	S243.083	Subdivision	SUB-S8	Support	The rule appropriately aligns with the esplanade reserve requirements of the RMA 1991. A lake of 8ha is suitably defined in the rule, with esplanades around smaller lakes likely of no or of limited public benefit and a significant imposition on landowners.	Retain Rule SUB-S8
Our Kerikeri Community Charitable Trust (S272)	S272.004	Subdivision	SUB-S8	Support	Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. In particular, we support Subdivision SUB-O4, SUB-P7 and SUB-S8. PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of 4ha or more. PDP provisions that normally require esplanade reserves when consenting land use and other forms of development. Improve provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values.	Retain SUB-S8
Our Kerikeri Community Charitable Trust (S272)	S272.022	Subdivision	SUB-S8	Support	In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System. s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not	Amend provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values

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					sufficient at present. PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values	
Trent Simpkin (S283)	S283.008	Subdivision	SUB-S8	Support in part	Esplanade Strips need to be an option. There needs to be allowance made for esplanade strips, as well as reserves. Sometimes they are more suitable for a development, and council has enough reserves which they are unable to maintain, so it makes more sense to vest it in the owners name to look after it.	Amend to add the option of an esplanade strip to the standard.
Tristan Simpkin (S287)	S287.007	Subdivision	SUB-S8	Oppose	Esplanade Strips need to be an option. There needs to be allowance made for esplanade strips, as well as reserves. Sometimes they are more suitable for a development, and council has enough reserves which they are unable to maintain, so it makes more sense to vest it in the owners name to look after it.	Amend to add the option of an esplanade strip to the standard.
P S Yates Family Trust (S333)	S333.057	Subdivision	SUB-S8	Support	The rule appropriately aligns with the esplanade reserve requirements of the RMA 1991. A lake of 8ha is suitably defined in the rule, with esplanades around smaller lakes likely of no or of limited public benefit and a significant imposition on landowners	Retain Rule SUB-S8
Sapphire Surveyors Limited (S348)	S348.007	Subdivision	SUB-S8	Support in part	Council already has enough reserves around that they are unable to maintain, so by vesting the land in Council via an esplanade reserve removes it from the care and stewardship of the adjacent landowner. At least with esplanade strips there is a duty (or at least the opportunity) for the landowner to look after the area, since it is still included in his/her title.	Amend Standard SUB-S8 to include the option of creating an esplanade strip
Sean Frieling (S357)	S357.038	Subdivision	SUB-S8	Support in part	Sometimes esplanade strips are more suitable than esplanade reserves. Council already has enough reserves around that they are unable to maintain. At least with esplanade strips there is a duty (or at least the opportunity) for the	Amend to insert the option of creating an esplanade strip in this rule.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					landowner to look after the area, since it is still included in their title.	
Leah Frieling (S358)	S358.041	Subdivision	SUB-S8	Support in part	<p>Section 77 of the RMA 1991 allows Council to create a rule that allows for an esplanade strip, but the PDP only has allowance for esplanade reserves. In some instances, esplanade strips are more suitable, so this option should be available.</p> <p>Council already has enough reserves around that they are unable to maintain, so by vesting the land in Council via an esplanade reserve removes it from the care and stewardship of the adjacent landowner. At least with esplanade strips there is a duty (or at least the opportunity) for the landowner to look after the area, since it is still included in his/her title.</p>	Amend Standard SUB-S8 to include the option of creating an esplanade strip
Far North District Council (S368)	S368.091	Subdivision	SUB-S8	Support in part	drafting error. Omission of esplanade strip within the rule, needs to be included	Amend SUB-S8 ...An esplanade reserve or esplanade strip must be provided with a minimum width of 20m, in accordance with section 230 of the RMA.
Rua Hatu Trust (S377)	S377.009	Subdivision	SUB-S8	Support in part	Council already has enough reserves around that they are unable to maintain, of by vesting the land in Council via an esplanade reserves removes it from the care and stewardship of the adjacent landowner. At least with esplanade strips there is a duty (or at least the opportunity) for the landowner to look after the area, since it is still included in his/her title.	Amend SUB-S8 to include the option of creating an esplanade strip in this rule.
Sean Jozef Vercammen (S395)	S395.009	Subdivision	SUB-S8	Support in part	Council already has enough reserves around that they are unable to maintain, so by vesting the land in Council via an esplanade reserve removes it from the care and stewardship of the adjacent landowner. At least with esplanade strips there is a duty (or at least the opportunity) for the landowner to look after the area, since it is still included in his/her title.	Amend SUB-S8 to include the option of creating an esplanade strip in this rule.

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Kerry-Anne Smith (S410)	S410.009	Subdivision	SUB-S8	Support in part	Council already has enough reserves around that they are unable to maintain, of by vesting the land in Council via an esplanade reserves removes it from the care and stewardship of the adjacent landowner. At least with esplanade strips there is a duty (or at least the opportunity) for the landowner to look after the area, since it is still included in his/her title.	Amend SUB-S8 to include the option of creating an esplanade strip in this rule.
Roger Myles Smith (S411)	S411.009	Subdivision	SUB-S8	Support in part	Council already has enough reserves around that they are unable to maintain, of by vesting the land in Council via an esplanade reserves removes it from the care and stewardship of the adjacent landowner. At least with esplanade strips there is a duty (or at least the opportunity) for the landowner to look after the area, since it is still included in his/her title.	Amend SUB-S8 to include the option of creating an esplanade strip in this rule.
John Joseph and Jacqueline Elizabeth Matthews (S439)	S439.009	Subdivision	SUB-S8	Support in part	Section 77 of the RMA 1991 allows Council to create a rule that allows for an esplanade strip, but the PDP only has allowance for esplanade reserves. In some instances, esplanade strips are more suitable, so this option should be available. Council already has enough reserves around that they are unable to maintain, so by vesting the land in Council via an esplanade reserve removes it from the care and stewardship of the adjacent landowner. At least with esplanade strips there is a duty (or at least the opportunity) for the landowner to look after the area, since it is still included in his/her title.	Amend Standard SUB-S8 to include the option of creating an esplanade strip
Kapiro Conservation Trust (S445)	S445.008	Subdivision	SUB-S8	Support	Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development. In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan.	Retain SUB-S8 and include in all zones in the PDP.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>We support the following statements in the s32 report on public access (management approach section):</p> <ul style="list-style-type: none"> - 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3) - 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3) 	
Kapiro Conservation Trust (S445)	S445.025	Subdivision	SUB-S8	Support in part	<p>In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System.</p> <p>s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present.</p> <p>PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values</p>	Amend SUB-S8 (inferred) relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values
LJ King Ltd (S464)	S464.009	Subdivision	SUB-S8	Oppose	<p>Council already has enough reserves around that they are unable to maintain, of by vesting the land in Council via an esplanade reserves removes it from the care and stewardship of the adjacent landowner.</p>	Amend SUB-S8 to not make it a requirement [for Council] to take an esplanade reserve.
Helmut Friedrick Paul Letz and Angelika	S470.009	Subdivision	SUB-S8	Support in part	<p>Council already has enough reserves around that they are unable to maintain, of by vesting the land in Council via an esplanade reserves removes it from the care and stewardship of the adjacent landowner. At least with esplanade strips there is a duty (or at least the opportunity)</p>	Amend SUB-S8 to include the option of creating an esplanade strip.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Eveline Letz (S470)					for the landowner to look after the area, since it is still included in his/her title.	
Michael Foy (S472)	S472.046	Subdivision	SUB-S8	Support in part	Section 77 of the RMA 1991 allows Council to create a rule that allows for an esplanade strip, but the PDP only has allowance for esplanade reserves. In some instances, esplanade strips are more suitable, so this option should be available. Council already has enough reserves around that they are unable to maintain, so by vesting the land in Council via an esplanade reserve removes it from the care and stewardship of the adjacent landowner. At least with esplanade strips there is a duty (or at least the opportunity) for the landowner to look after the area, since it is still included in his/her title.	Amend to include the option of creating an esplanade strip in the subdivision chapter (inferred)
Elbury Holdings (S485)	S485.010	Subdivision	SUB-S8	Support in part	Council already has enough reserves around that they are unable to maintain, of by vesting the land in Council via an esplanade reserves removes it from the care and stewardship of the adjacent landowner.	Amend SUB-S8 to not make it a requirement [for Council] to take an esplanade reserve
Northland Planning and Development 2020 Limited (S502)	S502.088	Subdivision	SUB-S8	Support in part	The provision of esplanade is to provide for walking, recreation and ecological benefits to members of the wider public. Section 230 of the RMA acknowledges that this can be provided in the form of Esplanade Reserve or Esplanade Strip. Both options should be available as a permitted activity to a developer in compliance with the Act.	Amend SUB-S8 to provide for Esplanade Reserve or Esplanade Strip a permitted activity to a developer in compliance with the Act
Elbury Holdings (S519)	S519.010	Subdivision	SUB-S8	Support in part	Council already has enough reserves around that they are unable to maintain, so by vesting the land in Council via an esplanade reserve removes it from the care and stewardship of the adjacent landowner.	Amend SUB-S8 to not make it a requirement to take an esplanade reserve
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)	S523.004	Subdivision	SUB-S8	Support	Our group supports policies and rules that will require the creation of esplanade reserves/strips along the coast and water bodies when consents are granted for subdivision, land use and other forms of development. In addition to the important principles of public access, there is increasing need to provide much greater connectivity and options for active	Retain SUB-S8

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>transport, especially walkways and cycleways. This places new importance on acquiring esplanade reserves/strips in suitable locations within the lifetime of the proposed district plan. We support the following statements in the s32 report on public access (management approach section):</p> <ul style="list-style-type: none"> - 'Far North District Council (Council) requires esplanade reserves where new sites are created adjacent to lakes, rivers or the coastal marine area' (p.3) - 'Rules and standards within the Subdivision chapter, requiring the creation of an esplanade reserve with a minimum width of 20m (in accordance with section 230 of the RMA), where subdivision involves the creation of one or more allotments less than 4ha' adjacent to relevant waterway etc. (p.3) 	
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S523)	S523.024	Subdivision	SUB-S8	Support	<p>In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System.</p> <p>s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present.</p> <p>PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values</p>	Amend SUB-S8 (inferred) relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values
Carbon Neutral NZ Trust (S529)	S529.059	Subdivision	SUB-S8	Support	<p>Support PDP policies and rules that require the creation of esplanade reserves associated with subdivision. In particular, we support Subdivision SUB-O4, SUB-P7 and SUB-S8.</p> <p>PDP policies/rules should require esplanade reserves/strips when subdivision creates lots of</p>	Retain SUB-S8 including application to all zones

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					4ha or more. PDP provisions that normally require esplanade reserves when consenting land use and other forms of development. Improve provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values.	
Carbon Neutral NZ Trust (S529)	S529.191	Subdivision	SUB-S8	Support in part	In some situations esplanade can serve an important role in protecting ecological values and protecting indigenous species that are classed as threatened or at risk under NZ Threat Classification System. s32 report (p.3) notes that policies to protect riparian/coastal areas should not compromise the natural character or indigenous biodiversity. We consider that the PDP provisions relating to the protection of indigenous species are not sufficient at present. PDP provisions relating to esplanade and reserves need to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values	Amend provisions relating to the esplanade reserves to include clauses that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values
Elbury Holdings (S541)	S541.009	Subdivision	SUB-S8	Support in part	Council already has enough reserves around that they are unable to maintain, so by vesting the land in Council via an esplanade reserve removes it from the care and stewardship of the adjacent landowner.	Amend to make it not a requirement to take an esplanades reserve.
LJ King Limited (S543)	S543.009	Subdivision	SUB-S8	Support in part	Council already has enough reserves around that they are unable to maintain, so by vesting the land in Council via an esplanade reserve removes it from the care and stewardship of the adjacent landowner.	Amend to make it not a requirement to take an esplanades reserve
Kelvin Richard Horsford (S544)	S544.009	Subdivision	SUB-S8	Support in part	Section 77 of the RMA 1991 allows Council to create a rule that allows for an esplanade strip, but the PDP only has allowance for esplanade reserves. In some instances, esplanade strips are more suitable, so this option should be	Amend to include the option of creating an esplanade strip in the subdivision chapter (inferred)

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					available. Council already has enough reserves around that they are unable to maintain, so by vesting the land in Council via an esplanade reserve removes it from the care and stewardship of the adjacent landowner. At least with esplanade strips there is a duty (or at least the opportunity) for the landowner to look after the area, since it is still included in his/her title	
LJ King Limited (S547)	S547.009	Subdivision	SUB-S8	Support in part	Council already has enough reserves around that they are unable to maintain, so by vesting the land in Council via an esplanade reserve removes it from the care and stewardship of the adjacent landowner.	Amend to make it not a requirement to take an esplanades reserve.
Rodney S Gates and Cherie R Gates (S569)	S569.009	Subdivision	SUB-S8	Support in part	Council already has enough reserves around that they are unable to maintain, so by vesting the land in Council via an esplanade reserve removes it from the care and stewardship of the adjacent landowner. At least with esplanade strips there is a duty (or at least the opportunity) for the landowner to look after the area, since it is still included in his/her title.	Amend SUB-S8 to include the option of creating an esplanade strip in this rule.
Haititaimara ngai Marae Kaitiaki Trust (S394)	S394.065	Activities on the surface of water	Objective	Oppose	This chapter is void of any objective pertaining to managing activities adjacent to waterbodies. Such activities can result in adverse effects on cultural values, including as those values relate to ecological consideration.	Insert new objective: OBJ ASW-XX Activities adjacent to waterbodies are managed in a way that avoids or minimises adverse effects on surface water
Te Rūnanga o Ngāti Rēhia (S559)	S559.047	Activities on the surface of water	Objective	Support in part	Ngāti Rēhia are the kaitiaki of the water resources within our rohe.	Insert an objective into the PDP that focuses on the relationship of tangata whenua to their ancestral waterways and the maintenance of that relationship.
Haititaimara ngai Marae Kaitiaki	S394.042	Activities on the surface of water	Policies	Oppose	Provision to manage activities adjacent to waterbodies is required to properly manage related potential effects.	Insert a new policy as follows: Manage the effects of activities adjacent to surface

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Trust (S394)						water by avoiding significant adverse cultural effects and remedying or mitigating other adverse cultural effects.
Haititaimara ngai Marae Kaitiaki Trust (S394)	S394.041	Activities on the surface of water	ASW-P3	Support	This provisions gives substance to higher order planning instruments.	Retain Policy ASW-P3
Te Hiku Iwi Development Trust (S399)	S399.068	Activities on the surface of water	ASW-P3	Not Stated	The word 'recognise' in this Policy does not demonstrate understanding and we feel a stronger verb is required to make this rule effective.	Amend Policy ASW-P3 as follows: Recognise and take into account tangata whenua's relationship with and cultural practices associated with freshwater when managing activities on the surface of water in rivers and lakes, including the ability to undertake customary activities.
New Zealand Defence Force (S217)	S217.023	Activities on the surface of water	Rules	Not Stated	The use of craft as described under PER-3 is in conflict with PER-1 and should be provided for in a separate rule. TMTA can include the use of motorised craft on the surface of waterbodies. NZDF seeks that defence activities be included in the new rule.	Insert new rule ASW-RXX The use of motorised craft Activity status: Permitted Where: PER-1 The craft is used for search and rescue, scientific investigations, defence purposes, noxious flora and fauna control, maintenance of the habitat of indigenous fauna, or monitoring; or irrigation network maintenance on Waingaro and Manuwai Reservoirs. Activity status where compliance not

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						achieved with PER-1: Discretionary
Far North District Council (S368)	S368.062	Activities on the surface of water	ASW-R1	Support in part	Use the term 'reservoirs' in PER-3 as a way to catch future potential reservoirs instead of listing Waingaro and Manuwai reservoirs in particular.	Amend ASW-R1 PER-3 The craft is used for search and rescue, scientific investigations, noxious flora and fauna control, maintenance of the habitat of indigenous fauna, or monitoring; or irrigation network maintenance on Waingaro and Manuwai reservoirs.
New Zealand Defence Force (S217)	S217.022	Activities on the surface of water	ASW-R2	Support in part	Performance standards PER-1 and PER-3 are contradictory. The use of craft as described under PER-3 should be provided for in a new rule.	Amend Rule ASW - R2 PER-1 The use is a non-commercial recreation activity. PER-2 The craft is not used for residential activity. PER 3The craft is used for search and rescue, scientific investigations, noxious flora and fauna control, maintenance of the habitat of indigenous fauna, or monitoring; or irrigation network maintenance on Waingaro and Manuwai Reservoirs. PER-4 With the exception of activities provided for in PER 3, the activity does not occur on any of the following water bodies:

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>a. Lake Ngatu; b. Lake Owhariti; c. Lake Heather; d. Lake Rotorua; e. Far North Dune Lakes; f. Waitangi River (above Haruru Falls); g. Waingaro Reservoir; h. Manuwai Reservoir.</p>
Far North District Council (S368)	S368.063	Activities on the surface of water	ASW-R2	Support in part	Use the term 'reservoirs' in PER-3 as a way to catch future potential reservoirs instead of listing Waingaro and Manuwai reservoirs in particular.	<p>Amend ASW-R2 PER-3 The craft is used for search and rescue, scientific investigations, noxious flora and fauna control, maintenance of the habitat of indigenous fauna, or monitoring; or irrigation network maintenance on Waingaro and Manuwai reservoirs.</p>
Manulife Forest Management (NZ) Ltd (S160)	S160.024	Activities on the surface of water	ASW-R3	Support	The submitter supports rule ASW-R3 Structures as it is written.	Retain rule ASW-R3 Structures as it is written.
New Zealand Defence Force (S217)	S217.024	Activities on the surface of water	ASW-R3	Support in part	<p>TMTA may involve the placement of temporary bridges over rivers and lakes, or temporary dams to enable training with potable water treatment units. It is appropriate that these structures are not restricted by the district plan, noting that they would be subject to regional planning provisions. Rule ASW-R3 provides for various structures as permitted activities. It is appropriate that structures associated with TMTA be included.</p>	<p>Amend Rule ASW-R3 as follows: PER-1 The structure is associated with a river crossing, temporary military training activity, scientific investigations, noxious flora and fauna control, maintenance of the habitat of indigenous fauna, or monitoring; or irrigation</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						network maintenance on Waingaro and Manuwai Reservoirs.
Waka Kotahi NZ Transport Agency (S356)	S356.093	Activities on the surface of water	ASW-R3	Support	not stated	Retain ASW-R3 as notified
Far North District Council (S368)	S368.064	Activities on the surface of water	ASW-R3	Support in part	Use the term 'reservoirs' in PER-1 as a way to catch future potential reservoirs instead of listing Waingaro and Manuwai reservoirs in particular	Amend ASW-R3 PER-1 The structure is associated with a river crossing, scientific investigations, noxious flora and fauna control, maintenance of the habitat of indigenous fauna, or monitoring; or irrigation network maintenance on Waingaro and Manuwai reservoirs.
MLP LLC (S183)	S183.002	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Landing Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Coastal Environment Chapter to recognise the proposed Landing Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Landing Scheme as well as the continuation of farming activities.
Tryphena Trustees Limited, David Haythornwaite (S226)	S226.002	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve	Amend the Overview of the Coastal Environment Overlay to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					the purpose of the Resource Management Act 1991 (RMA).	Scheme as well as the continuation of farming activities.
Tryphena Trustees Limited, David Haythornwaite (S226)	S226.003	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Isles Casey Trustee Services Limited, WWC Trustee Company Limited (S227)	S227.002	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Coastal Environment Overlay to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Jayesh Govind and Others (S228)	S228.002	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Coastal Environment Overlay to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Laurie Pearson (S229)	S229.002	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Coastal Environment Overlay to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Mataka Residents'	S230.002	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented	Amend the Overview of the Coastal Environment Overlay to recognise

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Association Inc (S230)					Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Ovisnegra Limited (S231)	S231.002	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Coastal Environment Overlay to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Tobias Groser (S232)	S232.002	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Coastal Environment Overlay to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Whale Bay Limited (S233)	S233.002	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Coastal Environment Overlay to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Whale Bay Limited (S234)	S234.002	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve	Amend the Overview of the Coastal Environment Overlay to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					the purpose of the Resource Management Act 1991 (RMA).	Scheme as well as the continuation of farming activities.
WW Trustee Services 2016 Limited, Eloise Caroline Caswell, Donald Gordon Chandler (S235)	S235.002	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Coastal Environment Overlay to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Connemara Black Limited (S236)	S236.002	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Coastal Environment Overlay to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Evan Williams and Katherine Williams (S237)	S237.002	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Coastal Environment Overlay to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
John Gowing and Miriam Van Lith (S238)	S238.002	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Coastal Environment Overlay to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
John Gowing,	S239.002	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented	Amend the Overview of the Coastal Environment Overlay to recognise

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Miriam Van Lith, Ellis Gowing, James Gowing, Byron Gowing (S239)					Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Matthew Watson, Kaylene Watson, D R Thomas Limited (S240)	S240.002	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Coastal Environment Overlay to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Matthew Draper and Michaela Jannard (S241)	S241.002	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Coastal Environment Overlay to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Philibert Jean-G Frick (S352)	S352.002	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Coastal Environment Overlay to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Far North District Council (S368)	S368.035	Coastal environment	Overview	Support in part	Grammatical errors in the Overview	Amend the second sentence of the overview as follows <p>communities community's Much of the Districts District's coastline while ensuring the</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						health, safety and wellbeing.
Maurice Dabbah (S422)	S422.002	Coastal environment	Overview	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend the overview of the Coastal Environment Overlay to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Bernard Sabrier (S423)	S423.002	Coastal environment	Overview	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend the Overview of the Coastal Environment Overlay to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Francois Dotta (S434)	S434.002	Coastal environment	Overview	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend the Overview of the Coastal Environment Overlay to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Elka Gouzer (S435)	S435.002	Coastal environment	Overview	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Overview of the Coastal Environment Overlay to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Kapiro Conservation Trust (S442)	S442.107	Coastal environment	Overview	Support in part	It appears that the focus of the coastal environment chapter is on natural character, however a number of provisions refer broadly to the coastal environment and its values while others are specific to ONL and ONF. It is confusing that the policies cover both ONL and ONF but there are no rules that cover these features.	Amend wording to reflect that the section covers other characteristics and values of the Coastal Environment, e.g. ONLs & ONFs Make it abundantly clear in an explanation somewhere that rules covering ONL and ONFs in the coastal environment are covered in the ONF and ONL chapter.
Royal Forest and Bird Protection Society of New Zealand (S511)	S511.088	Coastal environment	Overview	Support in part	It appears that the focus of the coastal environment chapter is on natural character, however a number of provisions refer broadly to the coastal environment and its values while others are specific to ONL and ONF. It is confusing that the policies cover both ONL and ONF but there are no rules that cover these features	Amend wording to reflect that the section covers other characteristics and values of the Coastal Environment, e.g. ONLs & ONFs Make it abundantly clear in an explanation somewhere that rules covering ONL and ONFs in the coastal environment are covered in the ONF and ONL chapter
Good Journey Limited (S82)	S82.009	Coastal environment	Objectives	Oppose	The objectives of the Coastal Environment Overlay are not supported by appropriate analysis, do not meet the provisions of s.32 of the Act, and do not accord with Part II of the RMA 1991.	Delete requirements for resource consent for building additions exceeding 20% in GFA, buildings exceeding one storey in height, reference to specific colours and reflectivity limitations in urban areas.
Russell Protection Society (INC) (S179)	S179.068	Coastal environment	Objectives	Support	In view of the fact that coastal zones are not provided for in the Proposed district plan, then the Coastal Environment, Natural Character and Natural Features and Landscape Overlays become very important in helping to define the boundaries of Russell and in safeguarding a suitable backdrop or canvass which to interpret and appreciate the historic township. It is especially important that these overlays provide adequate protection to the headlands framing Russell and the natural coastal escarpments that characterize the balance of the Russell Peninsula. For this reason it is important to control subdivision and development of coastal lands in the area.	Retain objectives

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					CE- 02 C is particularly relevant for Russell where ribbon development is actively occurring along the Peninsula.	
MLP LLC (S183)	S183.003	Coastal environment	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Landing Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Landing Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Landing Scheme as well as the continuation of farming activities.
Isles Casey Trustee Services Limited, WWC Trustee Company Limited (S227)	S227.003	Coastal environment	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Jayesh Govind and Others (S228)	S228.003	Coastal environment	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Laurie Pearson (S229)	S229.003	Coastal environment	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					the purpose of the Resource Management Act 1991 (RMA).	within the Mataka Scheme as well as the continuation of farming activities.
Mataka Residents' Association Inc (S230)	S230.003	Coastal environment	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Ovisnegra Limited (S231)	S231.003	Coastal environment	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Tobias Groser (S232)	S232.003	Coastal environment	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Whale Bay Limited (S233)	S233.003	Coastal environment	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						as the continuation of farming activities.
Whale Bay Limited (S234)	S234.003	Coastal environment	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
WW Trustee Services 2016 Limited, Eloise Caroline Caswell, Donald Gordon Chandler (S235)	S235.003	Coastal environment	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Connemara Black Limited (S236)	S236.003	Coastal environment	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Evan Williams and Katherine Williams (S237)	S237.003	Coastal environment	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						as the continuation of farming activities.
John Gowing and Miriam Van Lith (S238)	S238.003	Coastal environment	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
John Gowing, Miriam Van Lith, Ellis Gowing, James Gowing, Byron Gowing (S239)	S239.003	Coastal environment	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Matthew Watson, Kaylene Watson, D R Thomas Limited (S240)	S240.003	Coastal environment	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Matthew Draper and Michaela Jannard (S241)	S241.003	Coastal environment	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Nicole Way and Christopher Huljich as Trustees of the Trssh Birnie Settlement Trust (S345)	S345.005	Coastal environment	Objectives	Oppose	<p>The Resource Consents at Mataka Station enable development, and completion of the Mataka Station development, notwithstanding the provisions of the Proposed District Plan. The Proposed District Plan fails to recognise, have regard to, or provide for the development and subdivision enabled by the Resource Consents.</p> <p>The Proposed District Plan provisions will restrict development of the Property, and Mataka Station more generally, in a manner that is inconsistent with the Resource Consents and the integrated and comprehensive development authorised by those. The Council's s32 analysis does not mention, or consider approved but unimplemented developments within the Property and Mataka Station more generally, nor elsewhere. The "low intensity" development controls and height limits proposed within the Coastal Environment are given very little analysis.</p> <p>The proposed provisions are inconsistent with the Act and relevant planning instruments.</p>	<p>Amend to explicitly, and specifically provide for, and preserve the activities and land uses authorised under the Resource Consents at Mataka Station.</p> <p>and/or</p> <p>Insert a new special purpose zone and/or structure plan together with appropriate provisions (objectives, policies and rules) enabling the residential activity and development as is authorised by the Resource Consents as a permitted activity (where they are in general accordance with the Resource Consents) as well as appropriate activities within the Rural Production Zone, regardless of the provisions of the CE, ONL or HNC.</p> <p>and/or</p> <p>Amend the provisions of the Proposed District Plan to preserve the activities and buildings authorised by the Resource Consents on the Property.</p>
Philibert Jean-G Frick (S352)	S352.003	Coastal environment	Objectives	Oppose	<p>The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).</p>	<p>Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.</p>
Haititaimara ngai Marae Kaitiaki Trust (S394)	S394.043	Coastal environment	Objectives	Support in part	<p>Recognition and provision for tangata whenua culture, traditions and ancestral relationships must be achieved in managing the coastal environment.</p>	<p>Insert a new objective as follows: Land use and subdivision in the coastal environment recognises and provides for tangata whenua culture,</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						traditions and their ancestral relationships.
Maurice Dabbah (S422)	S422.003	Coastal environment	Objectives	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents'] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Bernard Sabrier (S423)	S423.003	Coastal environment	Objectives	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents'] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
John Andrew Riddell (S431)	S431.027	Coastal environment	Objectives	Not Stated	Not stated	Insert new Objective CE-04 as follows: To minimise adverse effects from activities in the coastal environment that cross the coastal marine area boundary

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Francois Dotta (S434)	S434.003	Coastal environment	Objectives	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents'] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Elka Gouzer (S435)	S435.003	Coastal environment	Objectives	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Objectives of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Kapiro Conservation Trust (S442)	S442.156	Coastal environment	Objectives	Support in part	The objectives are incomplete in that they do not address the protection, active management, and restoration of indigenous nature as part of protecting coastal natural character.	Insert additional objectives that address the protection, active management, and restoration of indigenous nature as part of protecting coastal natural character in the Far North District.
Pacific Eco-Logic (S451)	S451.012	Coastal environment	Objectives	Support in part	The objectives are incomplete in that they do not address the protection, active management, and restoration of indigenous nature as part of protecting coastal natural character	Insert additional objectives that address the protection, active management, and restoration of indigenous nature as part of protecting coastal natural character in the Far North District.
Transpower New Zealand Ltd (S454)	S454.096	Coastal environment	Objectives	Not Stated	Due to its linear nature and the requirement to connect new electricity generation to the National Grid, regardless of where the new generation facilities are located, transmission lines may need to traverse any area within the Far North District. Transpower is aware that new renewable energy generation such as solar and wind is being investigated in Northland and may require the location of electricity generation and	Insert new objective CE-O4 as follows: Infrastructure that has a functional or operational need to locate in the Coastal Environment is provided for.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					transmission facilities in the Coastal Environment. Offshore wind generation, in particular, is likely to require transmission facilities to be located on land as close as possible to the offshore wind generation. Critical infrastructure such as the National Grid sometimes has a functional or operational need to locate in the Coastal Environment and needs to be provided for. A new objective is required to address this.	
The Paihia Property Owners Group (S565)	S565.002	Coastal environment	Objectives	Support in part	The report provided by Melean Absolum Limited, that supports the Coastal Environment s32 Report prepared by Council, only suggests potential rules for the Coastal Environment within an urban area. There is no detailed evidence provided within either report to support these 'suggestions'. The PDP includes to rules such as a 5m height limit, 300m2 building / floor area coverage, and 400m2 indigenous vegetation and earthworks limits within an urban area. There is limited rationale as to why and how these provisions were selected. it is not clear why 5m was selected, or why this height limit is appropriate. No specific locality assessments have been undertaken specifically to suggest that this is appropriate in a highly modified urban environment such as Paihia.	Amend the objectives within the Coastal Environment to promote more enabling and appropriate provisions as they relate to urban areas such as Paihia.
Bentzen Farm Limited (S167)	S167.066	Coastal environment	CE-O1	Oppose	This objective lacks specificity as to the outcome sought for the coastal environment and, together with Objective CE-02, fails to take into account the full scope of resources in the coastal environment and the range of existing and potential new sustainable land uses able to be supported in the coastal environment (including opportunities for restoration or rehabilitation of modified or degraded areas of natural character through land use and subdivision).	Delete Objectives CE-O1 and CE-02 and replace with the following: Objective CE-O1 Subdivision, use and development in the Coastal Environment:a. Enables people and their communities to provide for the social, economic, and cultural well-being and their health and safety;b. Maintains or restores the integrity, form, functioning

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>and resilience of the Coastal Environment; and c. Protects the indigenous biodiversity values of the Coastal Environment in relation to the biodiversity values present; andd. Preserves the natural character of the Coastal Environment in relation to the level of natural character present; ande. Protects natural features and landscapes values of the Coastal Environment in relation to the level of natural feature and landscape values present; andf. Recognises and provides for the relationship of tāngata whenua with the Coastal Environment; andg. Maintains and enhances public open space and recreation opportunities in the Coastal Environment; andh. Manages coastal hazard risks, including the longterm projected effects of climate change; andi. Protects and enhances historic heritage values; andj. Avoids sprawling or sporadic patterns of development and enabling consolidation of existing settlements.k. Where appropriate, promotes</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						opportunities for restoration or rehabilitation of modified or degraded areas of natural character.
Setar Thirty Six Limited (S168)	S168.066	Coastal environment	CE-O1	Oppose	<p>Objective CE-O1 seeks that the natural character of the coastal environment is identified and managed to ensure its long-term preservation and protection for current and future generations.</p> <p>This objective lacks specificity as to the outcome sought for the coastal environment and, together with Objective CE-02, fails to take into account the full scope of resources in the coastal environment and the range of existing and potential new sustainable land uses able to be supported in the coastal environment (including opportunities for restoration or rehabilitation of modified or degraded areas of natural character through land use and subdivision).</p> <p>This submission seeks both objectives both be deleted and replaced with a consolidated single objective which sets out a clear and specific outcome for resources in the coastal environment, and which gives effect to the NZCPS.</p>	<p>Delete Objectives CE-O1 and CE-02 and insert the following: Objective CE-01 Subdivision, use and development in the Coastal Environment:</p> <ul style="list-style-type: none"> a. Enables people and their communities to provide for the social, economic, and cultural well-being and their health and safety; b. Maintains or restores the integrity, form, functioning and resilience of the Coastal Environment; and c. Protects the indigenous biodiversity values of the Coastal Environment in relation to the biodiversity values present; and d. Preserves the natural character of the Coastal Environment in relation to the level of natural character present; and e. Protects natural features and landscapes values of the Coastal Environment in relation

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>to the level of natural feature and landscape values present; and</p> <p>f. Recognises and provides for the relationship of tāngata whenua with the Coastal Environment; and</p> <p>Maintains and enhances public open space and recreation opportunities in the Coastal Environment; and</p> <p>h. Manages coastal hazard risks, including the longterm projected effects of climate change; and</p> <p>i. Protects and enhances historic heritage values; and</p> <p>j. Avoids sprawling or sporadic patterns of development and enabling consolidation of existing settlements.</p> <p>k. Where appropriate, promotes opportunities for restoration or rehabilitation of modified or degraded areas of natural character.</p>
<p>The Shooting Box Limited (S187)</p>	<p>S187.058</p>	<p>Coastal environment</p>	<p>CE-O1</p>	<p>Oppose</p>	<p>Refer to submission for detailed reasons for decision(s) requested relating, but not limited to, the following: CE-O1 lacks specificity as to the outcome sought for the coastal environment, and together with CE-O2, fails to take into account the full scope of resources in the coastal environment and the range of existing and</p>	<p>Delete Objectives CE-O1 and CE-02 and replace with the following: Objective CE-O1 Subdivision, use and development in the Coastal Environment:</p> <p>a. Enables people and their communities to provide for the</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>potential new sustainable land uses able to be supported in the coastal environment.</p>	<p>social, economic, and cultural well-being and their health and safety; b. Maintains or restores the integrity, form, functioning and resilience of the Coastal Environment; and c. Protects the indigenous biodiversity values of the Coastal Environment in relation to the biodiversity values present; and d. Preserves the natural character of the Coastal Environment in relation to the level of natural character present; and e. Protects natural features and landscapes values of the Coastal Environment in relation to the level of natural feature and landscape values present; and f. Recognises and provides for the relationship of tāngata whenua with the Coastal Environment; and g. Maintains and enhances public open space and recreation opportunities in the Coastal Environment; and h. Manages coastal hazard risks, including the long-term projected effects of climate change; and i. Protects and enhances historic heritage values; and j. Avoids sprawling or sporadic patterns of development and enabling consolidation of existing settlements. k. Where appropriate, promotes opportunities for restoration or rehabilitation of modified or degraded areas of natural character.</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Wendover Two Limited (S222)	S222.058	Coastal environment	CE-01	Oppose	<p>Objective CE-01 seeks that the natural character of the coastal environment is identified and managed to ensure its long-term preservation and protection for current and future generations. This objective lacks specificity as to the outcome sought for the coastal environment and, together with Objective CE-02, fails to take into account the full scope of resources in the coastal environment and the range of existing and potential new sustainable land uses able to be supported in the coastal environment (including opportunities for restoration or rehabilitation of modified or degraded areas of natural character through land use and subdivision).</p> <p>This submission seeks both objectives both be deleted and replaced with a consolidated single objective which sets out a clear and specific outcome for resources in the coastal environment, and which gives effects to the NZCPS.</p>	<p>Delete Objectives CE-01 and insert with the following:CE-01 Subdivision, use and development in the Coastal Environment:a. Enables people and their communities to provide for the social, economic, and cultural well-being and their health and safety;b. Maintains or restores the integrity, form, functioning and resilience of the CoastalEnvironment; andc. Protects the indigenous biodiversity values of the Coastal Environment in relation to the biodiversity values present; andd. Preserves the natural character of the Coastal Environment in relation to the level of natural character present; ande. Protects natural features and landscapes values of the Coastal Environment in relation to the level of natural feature and landscape values present; andf. Recognises and provides for the relationship of tāngata whenua with the Coastal Environment; andg. Maintains and enhances public open space and recreation opportunities in the Coastal</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>Environment; andh. Manages coastal hazard risks, including the longterm projected effects of climate change; andi. Protects and enhances historic heritage values; andj. Avoids sprawling or sporadic patterns of development and enabling consolidation of existing settlements.k. Where appropriate, promotes opportunities for restoration or rehabilitation of modified or degraded areas of natural character.</p>
<p>Matauri Trustee Limited (S243)</p>	<p>S243.084</p>	<p>Coastal environment</p>	<p>CE-O1</p>	<p>Oppose</p>	<p>Objective CE-O1 seeks that the natural character of the coastal environment is identified and managed to ensure its long-term preservation and protection for current and future generations.</p> <p>This objective lacks specificity as to the outcome sought for the coastal environment and, together with Objective CE-02, fails to take into account the full scope of resources in the coastal environment and the range of existing and potential new sustainable land uses able to be supported in the coastal environment (including opportunities for restoration or rehabilitation of modified or degraded areas of natural character through land use and subdivision).</p> <p>This submission seeks Objectives CE-O1 and CE-O2 be deleted and replaced with a consolidated single objective which sets out a clear and specific outcome for resources in the coastal environment, and which gives effects to the NZCPS.</p>	<p>Delete Objectives CE-O1 and CE-02 and replace with the following:Objective CE-O1 Subdivision, use and development in the Coastal Environment:a. Enables people and their communities to provide for the social, economic, and cultural well-being and their health and safety;b. Maintains or restores the integrity, form, functioning and resilience of the Coastal Environment; andc. Protects the indigenous biodiversity values of the Coastal Environment in relation to the</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>biodiversity values present; andd. Preserves the natural character of the Coastal Environment in relation to the level of natural character present; ande. Protects natural features and landscapes values of the Coastal Environment in relation to the level of natural feature and landscape values present; andf. Recognises and provides for the relationship of tāngata whenua with the Coastal Environment; andg. Maintains and enhances public open space and recreation opportunities in the Coastal Environment; andh. Manages coastal hazard risks, including the long-term projected effects of climate change; andi. Protects and enhances historic heritage values; andj. Avoids sprawling or sporadic patterns of development and enabling consolidation of existing settlements.k. Where appropriate, promotes opportunities for restoration or rehabilitation of modified or degraded areas of natural character.</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Willowridge Developments Limited (S250)	S250.013	Coastal environment	CE-O1	Support	This objective as it is considered to align with the RPS and Section 6(a) of the RMA.	Retain as notified.
P S Yates Family Trust (S333)	S333.058	Coastal environment	CE-O1	Oppose	<p>Objective CE-O1 seeks that the natural character of the coastal environment is identified and managed to ensure its long-term preservation and protection for current and future generations.</p> <p>This objective lacks specificity as to the outcome sought for the coastal environment and, together with Objective CE-02, fails to take into account the full scope of resources in the coastal environment and the range of existing and potential new sustainable land uses able to be supported in the coastal environment (including opportunities for restoration or rehabilitation of modified or degraded areas of natural character through land use and subdivision).</p> <p>This submission seeks both objectives both be deleted and replaced with a consolidated single objective which sets out a clear and specific outcome for resources in the coastal environment, and which gives effects to the NZCPS.</p>	<p>Delete Objectives CE-O1 and replace with the following: <i>Objective CE-O1 Subdivision, use and development in the Coastal Environment: a. Enables people and their communities to provide for the social, economic, and cultural well-being and their health and safety; b. Maintains or restores the integrity, form, functioning and resilience of the Coastal Environment; and c. Protects the indigenous biodiversity values of the Coastal Environment in relation to the biodiversity values present; and d. Preserves the natural character of the Coastal Environment in relation to the level of natural character present; and e. Protects natural features and landscapes values of the Coastal Environment in relation to the level of natural feature and landscape values present; and f. Recognises and provides for the relationship of</i></p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p><i>tāngata whenua with the Coastal Environment; and g. Maintains and enhances public open space and recreation opportunities in the Coastal Environment; and h. Manages coastal hazard risks, including the long-term projected effects of climate change; and i. Protects and enhances historic heritage values; and j. Avoids sprawling or sporadic patterns of development and enabling consolidation of existing settlements. k. Where appropriate, promotes opportunities for restoration or rehabilitation of modified or degraded areas of natural character.</i></p>
Sarah Ballantyne and Dean Agnew (S386)	S386.009	Coastal environment	CE-O1	Support	Ballantyne & Agnew support the intention of this objective as it is considered to align with the RPS and Section 6(a) of the RMA.	Retain as notified.
Northland Federated Farmers of New Zealand (S421)	S421.181	Coastal environment	CE-O1	Support in part	Objective CE-O1 as currently worded is not consistent with section 6 of the Resource Management Act 1991. Federated Farmers seeks the amendment of the objective to be consistent with section 6 and to reflect protection of natural character from only inappropriate activities rather than all.	Amend Objective CE-O1 as follows: The natural character of the coastal environment is identified and managed to ensure its long-term preservation and protection from inappropriate use, development, and subdivision for current and future

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						generations. or wording with similar intent
Waiaua Bay Farm Limited (S463)	S463.051	Coastal environment	CE-O1	Oppose	This objective is almost identical to proposed objective NATC-O1 and displays the same issues in that it appears to be a recombination of RMA s6(a) with the inclusion of a vague reference to "long-term" protection and a superfluous reference to "current and future generations". However, the objective fails to recognise the RMA s6(a) distinction regarding protection from inappropriate activities. The objective appears to envisage outright "preservation and protection" without recognition that some activities and the associated effects, may not necessarily be inappropriate.	Delete Objective CE-O1
Horticulture New Zealand (S159)	S159.071	Coastal environment	CE-O2	Support	Land use which is consistent with the surrounding land use is appropriate	Retain Objective CE-O2
Bentzen Farm Limited (S167)	S167.067	Coastal environment	CE-O2	Oppose	This objective lacks specificity as to the outcome sought for the coastal environment and, together with Objective CE-02, fails to take into account the full scope of resources in the coastal environment and the range of existing and potential new sustainable land uses able to be supported in the coastal environment (including opportunities for restoration or rehabilitation of modified or degraded areas of natural character through land use and subdivision).	Delete Objectives CE-O1 and CE-02 and replace with the following: Objective CE-O1 Subdivision, use and development in the Coastal Environment: a. Enables people and their communities to provide for the social, economic, and cultural well-being and their health and safety;b. Maintains or restores the integrity, form, functioning and resilience of the Coastal Environment; and c. Protects the indigenous biodiversity values of the Coastal Environment in relation

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>to the biodiversity values present; andd. Preserves the natural character of the Coastal Environment in relation to the level of natural character present; ande. Protects natural features and landscapes values of the Coastal Environment in relation to the level of natural feature and landscape values present; andf. Recognises and provides for the relationship of tāngata whenua with the Coastal Environment; andg. Maintains and enhances public open space and recreation opportunities in the Coastal Environment; andh. Manages coastal hazard risks, including the longterm projected effects of climate change; andi. Protects and enhances historic heritage values; andj. Avoids sprawling or sporadic patterns of development and enabling consolidation of existing settlements.k. Where appropriate, promotes opportunities for restoration or rehabilitation of modified or degraded areas of natural character.</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Setar Thirty Six Limited (S168)	S168.067	Coastal environment	CE-02	Oppose	<p>Objective CE-01 seeks that the natural character of the coastal environment is identified and managed to ensure its long-term preservation and protection for current and future generations.</p> <p>This objective lacks specificity as to the outcome sought for the coastal environment and, together with Objective CE-02, fails to take into account the full scope of resources in the coastal environment and the range of existing and potential new sustainable land uses able to be supported in the coastal environment (including opportunities for restoration or rehabilitation of modified or degraded areas of natural character through land use and subdivision).</p> <p>This submission seeks both objectives both be deleted and replaced with a consolidated single objective which sets out a clear and specific outcome for resources in the coastal environment, and which gives effect to the NZCPS.</p>	<p>Delete Objectives CE-01 and CE-02 and insert the following: Objective CE-01 Subdivision, use and development in the Coastal Environment:</p> <ul style="list-style-type: none"> a. Enables people and their communities to provide for the social, economic, and cultural well-being and their health and safety; b. Maintains or restores the integrity, form, functioning and resilience of the Coastal Environment; and c. Protects the indigenous biodiversity values of the Coastal Environment in relation to the biodiversity values present; and d. Preserves the natural character of the Coastal Environment in relation to the level of natural character present; and e. Protects natural features and landscapes values of the Coastal Environment in relation to the level of natural feature and landscape values present; and f. Recognises and provides for the relationship of tāngata

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>whenua with the Coastal Environment; and Maintains and enhances public open space and recreation opportunities in the Coastal Environment; andh. Manages coastal hazard risks, including the longterm projected effects of climate change; andi. Protects and enhances historic heritage values; andj. Avoids sprawling or sporadic patterns of development and enabling consolidation of existing settlements.k. Where appropriate, promotes opportunities for restoration or rehabilitation of modified or degraded areas of natural character.</p>
<p>The Shooting Box Limited (S187)</p>	<p>S187.099</p>	<p>Coastal environment</p>	<p>CE-O2</p>	<p>Oppose</p>	<p>Refer to submission for detailed reasons for decision(s) requested relating, but not limited to, the following: CE-O1 lacks specificity as to the outcome sought for the coastal environment, and together with CE-O2, fails to take into account the full scope of resources in the coastal environment and the range of existing and potential new sustainable land uses able to be supported in the coastal environment.</p>	<p>Delete Objectives CE-O1 and CE-02 and replace with the following: Objective CE-O1 Subdivision, use and development in the Coastal Environment:</p> <ul style="list-style-type: none"> a. Enables people and their communities to provide for the social, economic, and cultural well-being and their health and safety; b. Maintains or restores the integrity, form, functioning and resilience of the Coastal Environment; and c. Protects the indigenous

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>biodiversity values of the Coastal Environment in relation to the biodiversity values present; and</p> <p>d. Preserves the natural character of the Coastal Environment in relation to the level of natural character present; and</p> <p>e. Protects natural features and landscapes values of the Coastal Environment in relation to the level of natural feature and landscape values present; and</p> <p>f. Recognises and provides for the relationship of tāngata whenua with the Coastal Environment; and</p> <p>g. Maintains and enhances public open space and recreation opportunities in the Coastal Environment; and</p> <p>h. Manages coastal hazard risks, including the long-term projected effects of climate change; and</p> <p>i. Protects and enhances historic heritage values; and</p> <p>j. Avoids sprawling or sporadic patterns of development and enabling consolidation of existing settlements.</p> <p>k. Where appropriate, promotes opportunities for restoration or rehabilitation of modified or degraded areas of natural character.</p>
<p>Wendover Two Limited (S222)</p>	<p>S222.059</p>	<p>Coastal environment</p>	<p>CE-O2</p>	<p>Support</p>	<p>Objective CE-O1 seeks that the natural character of the coastal environment is identified and managed to ensure its long-term preservation and protection for current and future generations. This objective lacks specificity as to the outcome sought for the coastal environment and, together</p>	<p>Delete Objectives CE-O2 and insert with the following:CE-O1 Subdivision, use and development in the Coastal Environment:a. Enables people and their communities to</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>with Objective CE-02, fails to take into account the full scope of resources in the coastal environment and the range of existing and potential new sustainable land uses able to be supported in the coastal environment (including opportunities for restoration or rehabilitation of modified or degraded areas of natural character through land use and subdivision).</p> <p>This submission seeks both objectives both be deleted and replaced with a consolidated single objective which sets out a clear and specific outcome for resources in the coastal environment, and which gives effects to the NZCPS.</p>	<p>provide for the social, economic, and cultural well-being and their health and safety;b. Maintains or restores the integrity, form, functioning and resilience of the Coastal Environment; andc. Protects the indigenous biodiversity values of the Coastal Environment in relation to the biodiversity values present; andd. Preserves the natural character of the Coastal Environment in relation to the level of natural character present; ande. Protects natural features and landscapes values of the Coastal Environment in relation to the level of natural feature and landscape values present; andf. Recognises and provides for the relationship of tāngata whenua with the Coastal Environment; andg. Maintains and enhances public open space and recreation opportunities in the Coastal Environment; andh. Manages coastal hazard risks, including the longterm projected effects of climate change; andi. Protects and enhances historic heritage values; andj. Avoids</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>sprawling or sporadic patterns of development and enabling consolidation of existing settlements.k. Where appropriate, promotes opportunities for restoration or rehabilitation of modified or degraded areas of natural character.</p>
<p>Matauri Trustee Limited (S243)</p>	<p>S243.085</p>	<p>Coastal environment</p>	<p>CE-O2</p>	<p>Oppose</p>	<p>Objective CE-O1 seeks that the natural character of the coastal environment is identified and managed to ensure its long-term preservation and protection for current and future generations. This objective lacks specificity as to the outcome sought for the coastal environment and, together with Objective CE-O2, fails to take into account the full scope of resources in the coastal environment and the range of existing and potential new sustainable land uses able to be supported in the coastal environment (including opportunities for restoration or rehabilitation of modified or degraded areas of natural character through land use and subdivision). This submission seeks Objectives CE-O1 and CE-O2 be deleted and replaced with a consolidated single objective which sets out a clear and specific outcome for resources in the coastal environment, and which gives effects to the NZCPS.</p>	<p>Delete Objectives CE-O1 and CE-O2 and replace with the following:Objective CE-O1 Subdivision, use and development in the Coastal Environment: a. Enables people and their communities to provide for the social, economic, and cultural well-being and their health and safety; b. Maintains or restores the integrity, form, functioning and resilience of the Coastal Environment; andc. Protects the indigenous biodiversity values of the Coastal Environment in relation to the biodiversity values present; andd. Preserves the natural character of the Coastal Environment in relation to the level of natural character present; ande. Protects natural</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>features and landscapes values of the Coastal Environment in relation to the level of natural feature and landscape values present; andf. Recognises and provides for the relationship of tāngata whenua with the Coastal Environment; andg. Maintains and enhances public open space and recreation opportunities in the Coastal Environment; andh. Manages coastal hazard risks, including the long-term projected effects of climate change; andi. Protects and enhances historic heritage values; andj. Avoids sprawling or sporadic patterns of development and enabling consolidation of existing settlements.k. Where appropriate, promotes opportunities for restoration or rehabilitation of modified or degraded areas of natural character.</p>
<p>P S Yates Family Trust (S333)</p>	<p>S333.059</p>	<p>Coastal environment</p>	<p>CE-O2</p>	<p>Oppose</p>	<p>Objective CE-O1 seeks that the natural character of the coastal environment is identified and managed to ensure its long-term preservation and protection for current and future generations. This objective lacks specificity as to the outcome</p>	<p>Delete Objective CE-02</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					sought for the coastal environment and, together with Objective CE-02, fails to take into account the full scope of resources in the coastal environment and the range of existing and potential new sustainable land uses able to be supported in the coastal environment (including opportunities for restoration or rehabilitation of modified or degraded areas of natural character through land use and subdivision). This submission seeks both objectives both be deleted and replaced with a consolidated single objective which sets out a clear and specific outcome for resources in the coastal environment, and which gives effects to the NZCPS.	
Waka Kotahi NZ Transport Agency (S356)	S356.094	Coastal environment	CE-O2	Neutral	Subclause (b) is unclear and should be deleted.	Amend as follows: Land use and subdivision in the coastal environment: a. preserves the characteristics and qualities of the natural character of the coastal environment; b. is consistent with the surrounding land use; c. ...
Matauri X Incorporation (S396)	S396.020	Coastal environment	CE-O2	Support	Matauri X submit that the Coastal Environment provisions do not appropriately recognise tangata whenua needs for ancestral use of whenua maori as provided for in CE-02. There are no specific provisions which relate back to this objective, so it is unclear how this will be achieved in practice through the provisions. Additional provisions are considered warranted which revolve around the expectation that tangata whenua will develop their landholdings in an appropriate manner.	retain CE-O2 specifically ...e. recognises tangata whenua needs for ancestral use of whenua Maori
Kapiro Conservation Trust (S442)	S442.108	Coastal environment	CE-O2	Support in part	Forest & Bird considers that the term "development" must also be specified in the provisions which refer to 'land use and subdivision'. "Development is specifically referred to in the NZCPS.	Insert "development," in front of land use and subdivision.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Waiaua Bay Farm Limited (S463)	S463.052	Coastal environment	CE-O2	Oppose	Sub-clause (b) would, in the case of a development or activity in a previously undeveloped part of the coastal environment, present a bar to approval. In another scenario, it would require a new land use to be "consistent" with surrounding land uses, even of the latter are undesirable. WBF recommends replacing the term "consistent" with the term "compatible"	Amend point b. of Objective CE-O2 as follows: b. is consistent-compatible with the surrounding land use;
Royal Forest and Bird Protection Society of New Zealand (S511)	S511.089	Coastal environment	CE-O2	Support in part	Forest & Bird considers that the term "development" must also be specified in the provisions which refer to 'land use and subdivision'. "Development is specifically referred to in the NZCPS.	Insert "development," in front of land use and subdivision.
Kapiro Conservation Trust (S442)	S442.109	Coastal environment	CE-O3	Support in part	Forest & Bird considers that the term "development" must also be specified in the provisions which refer to 'land use and subdivision'. "Development is specifically referred to in the NZCPS.	Insert "development," in front of land use and subdivision.
Royal Forest and Bird Protection Society of New Zealand (S511)	S511.090	Coastal environment	CE-O3	Support in part	Forest & Bird considers that the term "development" must also be specified in the provisions which refer to 'land use and subdivision'. "Development is specifically referred to in the NZCPS.	Insert "development," in front of land use and subdivision
Good Journey Limited (S82)	S82.010	Coastal environment	Policies	Oppose	The policies of the Coastal Environment Overlay are not supported by appropriate analysis, do not meet the provisions of s.32 of the Act, and do not accord with Part II of the RMA 1991.	Delete requirements for resource consent for building additions exceeding 20% in GFA, buildings exceeding one storey in height, reference to specific colours and reflectivity limitations in urban areas.
Russell Protection Society	S179.069	Coastal environment	Policies	Support	In view of the fact that coastal zones are not provided for in the Proposed district plan, then the Coastal Environment, Natural Character and Natural Features and Landscape Overlays	Retain Policies

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(INC) (S179)					become very important in helping to define the boundaries of Russell and in safeguarding a suitable backdrop or canvass which to interpret and appreciate the historic township. It is especially important that these overlays provide adequate protection to the headlands framing Russell and the natural coastal escarpments that characterize the balance of the Russell Peninsula. For this reason it is important to control subdivision and development of coastal lands in the area.	
MLP LLC (S183)	S183.004	Coastal environment	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Landing Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Coastal Environment Chapter to recognise the proposed Landing Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Landing Scheme as well as the continuation of farming activities.
Tryphena Trustees Limited, David Haythornwaite (S226)	S226.004	Coastal environment	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Isles Casey Trustee Services Limited, WWC Trustee Company Limited (S227)	S227.004	Coastal environment	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Jayesh Govind and	S228.004	Coastal environment	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented	Amend the Policies of the Coastal Environment Chapter to recognise

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Others (S228)					Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Laurie Pearson (S229)	S229.004	Coastal environment	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Mataka Residents' Association Inc (S230)	S230.004	Coastal environment	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Ovisnegra Limited (S231)	S231.004	Coastal environment	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Tobias Groser (S232)	S232.004	Coastal environment	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources	Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures

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					and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Whale Bay Limited (S233)	S233.004	Coastal environment	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Whale Bay Limited (S234)	S234.004	Coastal environment	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
WW Trustee Services 2016 Limited, Eloise Caroline Caswell, Donald Gordon Chandler (S235)	S235.004	Coastal environment	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Connemara Black Limited (S236)	S236.004	Coastal environment	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.

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Evan Williams and Katherine Williams (S237)	S237.004	Coastal environment	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
John Gowing and Miriam Van Lith (S238)	S238.004	Coastal environment	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
John Gowing, Miriam Van Lith, Ellis Gowing, James Gowing, Byron Gowing (S239)	S239.004	Coastal environment	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Matthew Watson, Kaylene Watson, D R Thomas Limited (S240)	S240.004	Coastal environment	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Matthew Draper and Michaela Jannard (S241)	S241.004	Coastal environment	Policies	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable	Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Nicole Way and Christopher Huljich as Trustees of the Trssh Birnie Settlement Trust (S345)	S345.006	Coastal environment	Policies	Oppose	<p>The Resource Consents at Mataka Station enable development, and completion of the Mataka Station development, notwithstanding the provisions of the Proposed District Plan. The Proposed District Plan fails to recognise, have regard to, or provide for the development and subdivision enabled by the Resource Consents.</p> <p>The Proposed District Plan provisions will restrict development of the Property, and Mataka Station more generally, in a manner that is inconsistent with the Resource Consents and the integrated and comprehensive development authorised by those. The Council's s32 analysis does not mention, or consider approved but unimplemented developments within the Property and Mataka Station more generally, nor elsewhere. The "low intensity" development controls and height limits proposed within the Coastal Environment are given very little analysis.</p> <p>The proposed provisions are inconsistent with the Act and relevant planning instruments.</p>	<p>Amend to explicitly, and specifically provide for, and preserve the activities and land uses authorised under the Resource Consents at Mataka Station.</p> <p>and/or</p> <p>Insert a new special purpose zone and/or structure plan together with appropriate provisions (objectives, policies and rules) enabling the residential activity and development as is authorised by the Resource Consents as a permitted activity (where they are in general accordance with the Resource Consents) as well as appropriate activities within the Rural Production Zone, regardless of the provisions of the CE, ONL or HNC.</p> <p>and/or</p> <p>Amend the provisions of the Proposed District Plan to preserve the activities and buildings authorised by the Resource Consents on the Property.</p>
Philibert Jean-G Frick (S352)	S352.004	Coastal environment	Policies	Oppose	<p>The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).</p>	<p>Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Northland Regional Council (S359)	S359.001	Coastal environment	Policies	Support in part	There are often difficulties in ensuring marine activities have the supporting land-based facilities required.	Amend the Plan to complement the cross-boundary matters section by incorporating policy in the coastal environment and infrastructure sections that seek subdivision, land use and development that is compatible with and where practicable complements use/activity in the coastal marine area.
Haitaitamarā ngai Marāe Kaitiaki Trust (S394)	S394.045	Coastal environment	Policies	Oppose	Adverse effects on cultural values must be managed appropriately, not just considered.	Insert a new policy as follows: Avoid significant adverse effects and remedy or mitigate other adverse effects on cultural values.
Maurice Dabbah (S422)	S422.004	Coastal environment	Policies	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents'] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
Bernard Sabrier (S423)	S423.004	Coastal environment	Policies	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents'] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.
John Andrew Riddell (S431)	S431.033	Coastal environment	Policies	Not Stated	Not stated	Insert a new policy as per Policy 4.6.1 of the Regional Policy Statement.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
John Andrew Riddell (S431)	S431.034	Coastal environment	Policies	Not Stated	The proposed Plan is set out in the atomistic way required by the National Planning Standards. As a consequence, in addition to the amendments sought to the Kororāreka Russell Township Zone provisions, there are amendments needed to other chapters of the proposed Plan, including the Coastal Environment Overlay, Historic Heritage and Subdivision provisions for the reasons set out with respect to the provisions in the Kororāreka Russell Township zone.	Insert a new policy as per Policy 5.1.2 of the Regional Policy Statement.
John Andrew Riddell (S431)	S431.035	Coastal environment	Policies	Not Stated	The proposed Plan is set out in the atomistic way required by the National Planning Standards. As a consequence, in addition to the amendments sought to the Kororāreka Russell Township Zone provisions, there are amendments needed to other chapters of the proposed Plan, including the Coastal Environment Overlay, Historic Heritage and Subdivision provisions for the reasons set out with respect to the provisions in the Kororāreka Russell Township zone.	<p>Insert a new policy as per Policy 10.4.1 of the Operative District Plan, as follows:That the Council only allows appropriate subdivision, use and development in the coastal environment. Appropriate subdivision, use and development is that where the activity generally:</p> <ol style="list-style-type: none"> <li data-bbox="1566 867 1898 1175">1. Recognises and provides for those features and elements that contribute to the natural character of an area that may require preservation, restoration or enhancement; and <li data-bbox="1566 1192 1898 1393">2. is in a location and of a scale and design that minimises adverse effects on the natural character of the coastal environment; and

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>3. has adequate services provided in a manner that minimises adverse effects on the coastal environment and does not adversely affect the safety and efficiency of the roading network; and</p> <p>4. avoids, as far as is practicable, adverse effects which are more than minor on heritage features, outstanding landscapes, cultural values, significant indigenous vegetation and significant habitats of indigenous fauna, amenity values of public land and waters and the natural functions and systems of the coastal environment; and</p> <p>5. promotes the protection, and where appropriate restoration and enhancement, of areas of significant indigenous vegetation and significant habitats</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>of indigenous fauna; and</p> <p>6. recognises and provides for the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga; and (g) where appropriate, provides for and, where possible, enhances public access to and along the coastal marine area; and</p> <p>7. gives effect to the New Zealand Coastal Policy Statement and the Regional Policy Statement for Northland.</p>
<p>John Andrew Riddell (S431)</p>	<p>S431.036</p>	<p>Coastal environment</p>	<p>Policies</p>	<p>Not Stated</p>	<p>Not stated</p>	<p>Insert a new policy as per Policy 10.4.7 of the Operative District Plan, as follows:To ensure the adverse effects of land-based activities associated with maritime facilities including mooring areas and boat ramps are avoided, remedied or mitigated through the provision of</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						adequate services, including where appropriate: (a) parking; (b) rubbish disposal; (c) waste disposal; (d) dinghy racks
John Andrew Riddell (S431)	S431.037	Coastal environment	Policies	Not Stated	Not stated	Insert a new policy as per Policy 10.4.12 of the Operative District Plan, as follows: That the adverse effects of development on the natural character and amenity values of the coastal environment will be minimised through: (a) the siting of buildings relative to the skyline, ridges, headlands and natural features; (b) the number of buildings and intensity of development;(c) the colour and reflectivity of buildings; (d) the landscaping (including planting) of the site; (e) the location and design of vehicle access, manoeuvring and parking areas
John Andrew Riddell (S431)	S431.038	Coastal environment	Policies	Not Stated	The proposed Plan is set out in the atomistic way required by the National Planning Standards. As a consequence, in addition to the amendments sought to the Kororāreka Russell Township Zone provisions, there are amendments needed to other chapters of the proposed Plan, including the Coastal Environment Overlay, Historic Heritage and Subdivision provisions for the reasons set out	Insert a new policy as per Policy 10.6.4.3 of the Operative District Plan, as follows: Subdivision, use and development shall preserve and where possible enhance, restore and rehabilitate the character of the zone in regards to s6

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					with respect to the provisions in the Kororāreka Russell Township zone.	<p>matters, and shall avoid adverse effects as far as practicable by using techniques including: (a) clustering or grouping development within areas where there is the least impact on natural character and its elements such as indigenous vegetation, landforms, rivers, streams and wetlands, and coherent natural patterns; (b) minimising the visual impact of buildings, development, and associated vegetation clearance and earthworks, particularly as seen from public land and the coastal marine area; (c) providing for, through siting of buildings and development and design of subdivisions, legal public right of access to and use of the foreshore and any esplanade areas; (d) through siting of buildings and development, design of subdivisions and provision of access, that recognise and provide for the relationship of Maori with their culture, traditions and taonga including concepts of mauri, tapu, mana, wehi and karakia and the</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>important contribution Maori culture makes to the character of the District; (e) providing planting of indigenous vegetation in a way that links existing habitats of indigenous fauna and provides the opportunity for the extension, enhancement or creation of habitats for indigenous fauna, including mechanisms to exclude pests; (f) protecting historic heritage through the siting of buildings and development and design of subdivisions.</p>
<p>Francois Dotta (S434)</p>	<p>S434.004</p>	<p>Coastal environment</p>	<p>Policies</p>	<p>Oppose</p>	<p>The Proposed Plan, if approved, will directly affect members of the [Mataka Residents] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.</p>	<p>Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.</p>
<p>Elka Gouzer (S435)</p>	<p>S435.004</p>	<p>Coastal environment</p>	<p>Policies</p>	<p>Oppose</p>	<p>The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).</p>	<p>Amend the Policies of the Coastal Environment Chapter to recognise the proposed Mataka Station Precinct provisions and the existing resource consent which provides for dwellings and buildings/structures on the Lots within the Mataka Scheme as well as the continuation of farming activities.</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Kapiro Conservation Trust (S442)	S442.157	Coastal environment	Policies	Support in part	The PDP policies do not address the protection of (terrestrial and freshwater) coastal indigenous ecological integrity and function, nor the protection of coastal indigenous ecological community structure and composition. Especially important is the protection of relatively intact indigenous forests, shrublands, coastal cliffs communities, coastal wetlands (including saltmarsh, salt meadow/herb field and freshwater wetlands), and dunelands. These are important components of coastal natural character and are often important for their biodiversity values. Notwithstanding policy CEP8, NZCPS 2010 policies 11, 13 and 14 need to be more completely addressed in the plan's coastal environment policies.	Insert additional policies addressing the need to: <ol style="list-style-type: none"> 1. Protect indigenous coastal forests, coastal shrublands, coastal cliffs communities, coastal and freshwater wetlands and dunelands 2. Protect coastal wetlands (including saltmarsh, salt meadow/herb field and freshwater wetlands) from activities inland of the CMA in the Far North District 3. The need to protect isolated important indigenous elements such as large pohutukawa and puriri trees, and fringing pohutukawa and other native trees in Northland's harbours and bays (e.g., Bay of Islands). 4. The need for coastal ecosystems (such as saltmarsh, salt meadow and floodplain wetlands) to be able to migrate inland as sea levels rise. Such policies may include promoting restrictions on new activities that would impede such landward migration of coastal ecotones.
Pacific Eco-Logic (S451)	S451.013	Coastal environment	Policies	Support in part	The PDP policies do not address the protection of (terrestrial and freshwater) coastal indigenous ecological integrity and function, nor the protection of coastal indigenous ecological community structure and composition. Especially important is the protection of relatively intact indigenous forests, shrublands, coastal cliffs communities, coastal wetlands (including saltmarsh, salt meadow/herb field and freshwater wetlands), and dunelands. These are important components of coastal natural character and are often important for their biodiversity values. Notwithstanding policy CEP8, NZCPS 2010 policies 11, 13 and 14 need	Insert additional policies addressing the need to: <ol style="list-style-type: none"> 1. Protect indigenous coastal forests, coastal shrublands, coastal cliffs communities, coastal and freshwater wetlands and dunelands 2. Protect coastal wetlands (including saltmarsh, salt meadow/herb field and freshwater wetlands) from activities inland of the CMA in the Far North District 3. The need to protect isolated important indigenous elements such as large pohutukawa and puriri

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					to be more completely addressed in the plan's coastal environment policies.	trees, and fringing pohutukawa and other native trees in Northland's harbours and bays (e.g., Bay of Islands). 4. The need for coastal ecosystems (such as saltmarsh, salt meadow and floodplain wetlands) to be able to migrate inland as sea levels rise. Such policies may include promoting restrictions on new activities that would impede such landward migration of coastal ecotones.
Transpower New Zealand Ltd (S454)	S454.099	Coastal environment	Policies	Not Stated	A number of policies set out the activities that are to be enabled in the General Residential zone. Transpower supports the intent of these policies, however critical infrastructure, such as the National Grid, is not clearly provided for. Due to its linear nature and the requirement to connect new electricity generation to the National Grid, regardless of where the new generation facilities are located, transmission lines may need to traverse any zone within the Far North District. Transpower is aware that new renewable energy generation such as solar and wind is being investigated in Northland and may require the location of electricity generation and transmission facilities in the Coastal Environment. Offshore wind generation, in particular, is likely to require transmission facilities to be located on land as close as possible to the offshore wind generation. A new policy is required to make it explicit that infrastructure such as the National Grid is enabled in the Coastal Environment zone.	Insert new policy CE-Px as follows: Enable infrastructure that has a functional and operational need to locate in the Coastal Environment.
The Paihia Property Owners Group (S565)	S565.003	Coastal environment	Policies	Support in part	The report provided by Melean Absolum Limited, that supports the Coastal Environment s32 Report prepared by Council, only suggests potential rules for the Coastal Environment within an urban area. There is no detailed evidence provided within either report to support	Amend the policies within the Coastal Environment to promote more enabling and appropriate provisions as they relate to urban areas such as Paihia.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					these 'suggestions'. The PDP includes to rules such as a 5m height limit, 300m2 building / floor area coverage, and 400m2 indigenous vegetation and earthworks limits within an urban area. There is limited rationale as to why and how these provisions were selected. it is not clear why 5m was selected, or why this height limit is appropriate. No specific locality assessments have been undertaken specifically to suggest that this is appropriate in a highly modified urban environment such as Paihia.	
Willowridge Developments Limited (S250)	S250.014	Coastal environment	CE-P1	Support	The identification methods and intention of this policy aligns with Policy 4.5.1 and Method 4.5.4 of the RPS.	Retain as notified.
Waka Kotahi NZ Transport Agency (S356)	S356.095	Coastal environment	CE-P1	Support	not stated	Retain CE-P1 as notified
Sarah Ballantyne and Dean Agnew (S386)	S386.010	Coastal environment	CE-P1	Support	Ballantyne & Agnew support the identification methods and intention of this policy as it aligns with Policy 4.5.1 and Method 4.5.4 of the RPS.	Retain as notified.
Northland Federated Farmers of New Zealand (S421)	S421.182	Coastal environment	CE-P1	Oppose	Federated Farmers does not support Policy CE-P1 as it uses the identification and mapping of high character areas. Throughout this submission we have consistently sought the deletion of the use and references to high character areas.	Amend Policy CE-P1 to remove all references to high character areas
Bentzen Farm Limited (S167)	S167.068	Coastal environment	CE-P2	Support in part	An amendment is sought to the policy to recognise that some of the overlays referenced identify "values" in APP-1.	Amend Policy CE-P2 as follows: Avoid adverse effects of land use and subdivision on the characteristics, values and qualities of the coastal environment identified as: a. outstanding natural character; b. ONL;

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						c. ONF.
Setar Thirty Six Limited (S168)	S168.068	Coastal environment	CE-P2	Support in part	An amendment is sought to the policy to recognise that some of the overlays referenced identify "values" in APP-1.	Amend Policy CE-P2 as follows: Avoid adverse effects of land use and subdivision on the characteristics, values and qualities of the coastal environment identified as ...
The Shooting Box Limited (S187)	S187.059	Coastal environment	CE-P2	Support in part	An amendment is sought to the policy to recognise that some of the overlays referenced identify "values" in APP-1.	Amend Policy CE-P2 as follows: Avoid adverse effects of land use and subdivision on the characteristics, values and qualities of the coastal environment identified as: a. outstanding natural character; b. ONL; c. ONF.
Wendover Two Limited (S222)	S222.060	Coastal environment	CE-P2	Support in part	An amendment is sought to the policy to recognise that some of the overlays referenced identify "values" in APP-1.	Amend Policy CE-P2 as follows: Avoid adverse effects of land use and subdivision on the characteristics, values and qualities of the coastal environment identified as: a. outstanding natural character; b. ONL; c. ONF.
Matauri Trustee Limited (S243)	S243.086	Coastal environment	CE-P2	Support in part	An amendment is sought to the policy to recognise that some of the overlays referenced identify "values" in APP-1.	Amend Policy CE-P2 as follows: Avoid adverse effects of land use and subdivision on the characteristics, values and

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						qualities of the coastal environment identified as: a. outstanding natural character; b. ONL; c. ONF.
P S Yates Family Trust (S333)	S333.060	Coastal environment	CE-P2	Support in part	An amendment is sought to the policy to recognise that some of the overlays referenced identify "values" in APP-1.	Amend Policy CE-P2 as follows: Avoid adverse effects of land use and subdivision on the characteristics, values and qualities of the coastal environment identified as: a. outstanding natural character; b. ONL; c. ONF.
Waka Kotahi NZ Transport Agency (S356)	S356.096	Coastal environment	CE-P2	Support	not stated	Retain CE-P2 as notified
Director-General of Conservation (Department of Conservation) (S364)	S364.063	Coastal environment	CE-P2	Support in part	This policy is generally supported by the Director-General as being consistent with Policies 13 and 15 of the NZCPS; however, the coastal environment has value in of itself, not just in characteristics and qualities and the wording should reflect this.	Change the wording of Policy CE-P2 as follows: Avoid adverse effects of land use and subdivision on the characteristics and qualities of the coastal environment identified as: a.outstanding natural character; b.ONL; c.ONF.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Northland Federated Farmers of New Zealand (S421)	S421.183	Coastal environment	CE-P2	Support in part	Objective CE-P2 as currently worded is not consistent with section 6 of the Resource Management Act 1991. Federated Farmers seeks the amendment of the policy to be consistent with section 6 and to reflect protection of natural character from only inappropriate activities rather than all.	Amend Objective CE-P2 as follows: Avoid adverse effects of inappropriate development , land use and subdivision on the characteristics and qualities of the coastal environment identified as: ... or wording with similar intent
Kapiro Conservation Trust (S442)	S442.110	Coastal environment	CE-P2	Support in part	Forest & Bird considers that the term "development" must also be specified in the provisions which refer to 'land use and subdivision'. "Development is specifically referred to in the NZCPS.	Insert "development," in front of land use and subdivision.
Kapiro Conservation Trust (S442)	S442.117	Coastal environment	CE-P2	Support in part	Generally support the directive wording of these policies. However, when APP1 is analysed it is slightly confusing between ONL, ONFs, natural character and the Coastal Environment. Certain 'Areas/Characteristics' seem to apply to natural character, natural features and landscapes. However it is difficult to resolve which parts of APP1 should apply and what characteristics and qualities are being protected or preserved. This is because the ONL and ONFs only discuss values, not characteristics. The criteria for Coastal Environment discuss characteristics. These characteristics of the Coastal Environment do not seem to include ONL, ONFs, and outstanding natural character in APP1.	Amend to clarify the relationship between all the elements of APP-1 and P2 and P3 to makes sure all the applicable values, characteristics and qualities are protected and preserved as required.
Transpower New Zealand Ltd (S454)	S454.097	Coastal environment	CE-P2	Not Stated	A consequential amendment to this policy is required to ensure that the FNPDP gives effect to the NPSET as set out in the submission point on I-P2 above.	Amend Policy CE-P2 as follows: Subject to I-Px , Avoid adverse effects of land use and subdivision on the characteristics and qualities of the coastal environment identified as: a. outstanding natural character;

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						b. ONL; c. ONF.
Royal Forest and Bird Protection Society of New Zealand (S511)	S511.091	Coastal environment	CE-P2	Support in part	Forest & Bird considers that the term "development" must also be specified in the provisions which refer to 'land use and subdivision'. "Development is specifically referred to in the NZCPS.	Insert "development," in front of land use and subdivision
Royal Forest and Bird Protection Society of New Zealand (S511)	S511.098	Coastal environment	CE-P2	Support in part	Generally support the directive wording of these policies. However, when APP1 is analysed it is slightly confusing between ONL, ONFs, natural character and the Coastal Environment. Certain 'Areas/Characteristics" seem to apply to natural character, natural features and landscapes. However it is difficult to resolve which parts of APP1 should apply and what characteristics and qualities are being protected or preserved. This is because the ONL and ONFs only discuss values, not characteristics. The criteria for Coastal Environment discuss characteristics. These characteristics of the Coastal Environment do not seem to include ONL, ONFs, and outstanding natural character in APP1	Amend to clarify the relationship between all the elements of APP-1 and P2 and P3 to makes sure all the applicable values, characteristics and qualities are protected and preserved as required.
Bentzen Farm Limited (S167)	S167.069	Coastal environment	CE-P3	Support in part	An amendment is sought to the policy to recognise that some of the overlays referenced identify "values" in APP-1.	Amend Policy CE-P3 as follows: Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on the characteristics, values and qualities of the coastal environment not identified as: a. outstanding natural character; b. ONL;

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						c. ONF.
Setar Thirty Six Limited (S168)	S168.069	Coastal environment	CE-P3	Support in part	An amendment is sought to the policy to recognise that some of the overlays referenced identify "values" in APP-1.	Amend Policy CE-P3 as follows: Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on the characteristics, values and qualities of the coastal environment not identified as ...
The Shooting Box Limited (S187)	S187.060	Coastal environment	CE-P3	Support in part	An amendment is sought to the policy to recognise that some of the overlays referenced identify "values" in APP-1.	Amend Policy CE-P3 as follows: Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on the characteristics, values and qualities of the coastal environment not identified as: a. outstanding natural character; b. ONL; c. ONF.
Wendover Two Limited (S222)	S222.061	Coastal environment	CE-P3	Support in part	An amendment is sought to the policy to recognise that some of the overlays referenced identify "values" in APP-1.	Amend Policy CE-P3 as follows: Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on the characteristics, values and qualities of the coastal environment not identified as: a. outstanding natural character; b. ONL;

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						c. ONF.
Matauri Trustee Limited (S243)	S243.087	Coastal environment	CE-P3	Support in part	An amendment is sought to the policy to recognise that some of the overlays referenced identify "values" in APP-1.	Amend Policy CE-P3 as follows: Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on the characteristics, values and qualities of the coastal environment not identified as: a. outstanding natural character; b. ONL; c. ONF.
P S Yates Family Trust (S333)	S333.061	Coastal environment	CE-P3	Support in part	An amendment is sought to the policy to recognise that some of the overlays referenced identify "values" in APP-1.	Amend Policy CE-P3 as follows: Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on the characteristics, values and qualities of the coastal environment not identified as: a. outstanding natural character; b. ONL; c. ONF.
Waka Kotahi NZ Transport Agency (S356)	S356.097	Coastal environment	CE-P3	Oppose	It is considered clearer and more consistent with the NZCPS to refer to "natural character" of the Coastal environment.	Amend as follows: Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on the characteristics and qualities natural character of the coastal environment not

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						identified as: a. outstanding natural character;b. ONL;c. ONF.
Director-General of Conservation (Department of Conservation) (S364)	S364.064	Coastal environment	CE-P3	Support in part	Policy CE-P3 is generally supported by the Director-General as being consistent with Policies 13 and 15 of the NZCPS; however, the coastal environment has value in of itself, not just in characteristics and qualities and the wording should reflect this.	Amend Policy CE-P3 as follows: Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on the natural character, natural features, and natural landscapes (including seascapes) characteristics and qualities of the coastal environment not identified as: a.outstanding natural character; b.ONL; c.ONF.
Kapiro Conservation Trust (S442)	S442.111	Coastal environment	CE-P3	Support	Forest & Bird considers that the term "development" must also be specified in the provisions which refer to 'land use and subdivision'. "Development is specifically referred to in the NZCPS.	Insert "development," in front of land use and subdivision.
Kapiro Conservation Trust (S442)	S442.118	Coastal environment	CE-P3	Support in part	Generally support the directive wording of these policies. However, when APP1 is analysed it is slightly confusing between ONL, ONFs, natural character and the Coastal Environment. Certain 'Areas/Characteristics" seem to apply to natural character, natural features and landscapes. However it is difficult to resolve which parts of APP1 should apply and what characteristics and qualified are being protected or preserved. This is because the ONL and ONFs only discuss values, not characteristics. The criteria for Coastal Environment discuss characteristics. These characteristics of the Coastal Environment do not seem to include ONL,	Amend to clarify the relationship between all the elements of APP-1 and P2 and P3 to makes sure all the applicable values, characteristics and qualities are protected and preserved as required.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					ONFs, and outstanding natural character in APP1.	
Transpower New Zealand Ltd (S454)	S454.098	Coastal environment	CE-P3	Not Stated	A consequential amendment to this policy is required to ensure that the FNPDP gives effect to the NPSET as set out in the submission point on I-P2 above.	Amend Policy CE-P3 as follows: (inferred) Subject to I-Px , Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on the characteristics and qualities of the coastal environment not identified as: a. outstanding natural character; b. ONL; c. ONF.
Waiaua Bay Farm Limited (S463)	S463.053	Coastal environment	CE-P3	Oppose	It is considered inappropriate to require all significant adverse effects to be avoided in areas of the coastal environment outside of "significant" (in a RMA section 6 sense) ONC, ONL and ONF areas. It is appropriate to facilitate an assessment of the merits of proposals with such effects rather than requiring outright avoidance as a first principle policy setting.	Amend Policy CE-P3 as follows: CE-P3 Avoid significant adverse effects and avoid, remedy or mitigate other Manage any adverse effects of land use and subdivision on the characteristics and qualities of the coastal environment in locations not identified as: a. outstanding natural character; b. ONL; and c. ONF.
Royal Forest and Bird Protection	S511.092	Coastal environment	CE-P3	Support in part	Forest & Bird considers that the term "development" must also be specified in the provisions which refer to 'land use and	Insert "development," in front of land use and subdivision

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Society of New Zealand (S511)					subdivision'. "Development is specifically referred to in the NZCPS	
Royal Forest and Bird Protection Society of New Zealand (S511)	S511.099	Coastal environment	CE-P3	Support in part	Generally support the directive wording of these policies. However, when APP1 is analysed it is slightly confusing between ONL, ONFs, natural character and the Coastal Environment. Certain 'Areas/Characteristics" seem to apply to natural character, natural features and landscapes. However it is difficult to resolve which parts of APP1 should apply and what characteristics and qualities are being protected or preserved. This is because the ONL and ONFs only discuss values, not characteristics. The criteria for Coastal Environment discuss characteristics. These characteristics of the Coastal Environment do not seem to include ONL, ONFs, and outstanding natural character in APP1	Amend to clarify the relationship between all the elements of APP-1 and P2 and P3 to makes sure all the applicable values, characteristics and qualities are protected and preserved as required.
Our Kerikeri Community Charitable Trust (S338)	S338.038	Coastal environment	CE-P4	Not Stated	We support policies/rules that seek to avoid urban/residential sprawl in rural and coastal areas. Sprawling development and residential growth in rural areas brings negative effects - it generates longer driving distances for basic services, climate emissions, fragments rural land, reduces the area of productive land and undermines the character and amenity values of rural and coastal areas. We support Coastal environment policy CE-P4 which states 'avoiding sprawl or sporadic patterns of development'.	Retain Policy CE-P4 and include similar provisions/rules in other zones/chapters
Director-General of Conservation (Department of Conservation) (S364)	S364.065	Coastal environment	CE-P4	Support	Policy CE-P4 is generally supported by the Director-General as being consistent with Policy 6 of the NZCPS	Retain Policy CE-P4
Kapiro Residents	S427.013	Coastal environment	CE-P4	Support in part	Future urban/residential development needs to be compact. Sprawling residential growth outside the urban areas brings negative effects -	Retain Coastal Environment Policy CE-P4 [inferred].

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Association (S427)					it generates longer driving distances for basic services, climate emissions, fragments rural land, reduces the area of productive land and undermines the character and amenity values of rural and coastal areas.	
John Andrew Riddell (S431)	S431.028	Coastal environment	CE-P4	Not Stated	Not stated	Amend point b. of Policy CE-P4 as follows: b. avoiding sprawling or sporadic patterns of development in the rural coastal environment.
Kapiro Conservation Trust (S442)	S442.112	Coastal environment	CE-P4	Support in part	Forest & Bird considers that the term "development" must also be specified in the provisions which refer to 'land use and subdivision'. "Development is specifically referred to in the NZCPS.	Insert "development," in front of land use and subdivision.
Kapiro Conservation Trust (S449)	S449.022	Coastal environment	CE-P4	Support	Future urban/residential development needs to be compact. Sprawling residential growth outside the urban areas brings negative effects - it generates longer driving distances for basic services, climate emissions, fragments rural land, reduces the area of productive land and undermines the character and amenity values of rural and coastal areas.	Retain Coastal Environment Policy CE-P4 [inferred].
Waiaua Bay Farm Limited (S463)	S463.054	Coastal environment	CE-P4	Oppose	Sub-clause (a) appears to disregard the presence of Special Purpose Zones, some of which (like the KCZ) were specifically established to provide for various developments beyond the boundaries of the district's towns.	Amend Policy CE-P4 as follows: CE-P4 Preserve the visual qualities, character and integrity of the coastal environment by: a. consolidating land use and subdivision around existing urban centres and rural settlements or in locations provided for by Special Purposes Zones; and b. avoiding sprawl or unplanned sporadic patterns of

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						development.
Royal Forest and Bird Protection Society of New Zealand (S511)	S511.093	Coastal environment	CE-P4	Support in part	Forest & Bird considers that the term "development" must also be specified in the provisions which refer to 'land use and subdivision'. "Development is specifically referred to in the NZCPS	Insert "development," in front of land use and subdivision
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S522)	S522.013	Coastal environment	CE-P4	Support	Future urban/residential development needs to be compact. Sprawling residential growth outside the urban areas brings negative effects - it generates longer driving distances for basic services, climate emissions, fragments rural land, reduces the area of productive land and undermines the character and amenity values of rural and coastal areas.	Retain Coastal Environment Policy CE-P4 [inferred].
Carbon Neutral NZ Trust (S529)	S529.021	Coastal environment	CE-P4	Support	Future urban/residential development needs to be compact. Sprawling residential growth outside the urban areas brings negative effects - it generates longer driving distances for basic services, climate emissions, fragments rural land, reduces the area of productive land and undermines the character and amenity values of rural and coastal areas.	Retain Coastal Environment Policy CE-P4 [inferred].
Director-General of Conservation (Department of Conservation) (S364)	S364.066	Coastal environment	CE-P5	Support in part	The coastal environment has value in of itself, not just in characteristics and qualities and the wording of the proposed policies should reflect this.	Amend Policy CE-P5 as follows: b. the use is consistent with, and does not compromise the characteristics and qualities coastal environment
John Andrew Riddell (S431)	S431.029	Coastal environment	CE-P5	Not Stated	The proposed Plan is set out in the atomistic way required by the National Planning Standards. As a consequence, in addition to the amendments sought to the Kororāreka Russell Township Zone provisions, there are amendments needed to other chapters of the proposed Plan, including the Coastal Environment Overlay, Historic Heritage and	Amend Policy CE-P5, to replace 'Enable' with 'Provide for' and amend point b. to identify what characteristics and qualities are not be compromised

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Subdivision provisions for the reasons set out with respect to the provisions in the Kororāreka Russell Township zone.	
Kapiro Conservation Trust (S442)	S442.113	Coastal environment	CE-P5	Support in part	Forest & Bird considers that the term "development" must also be specified in the provisions which refer to 'land use and subdivision'. "Development is specifically referred to in the NZCPS.	Insert "development," in front of land use and subdivision.
Royal Forest and Bird Protection Society of New Zealand (S511)	S511.094	Coastal environment	CE-P5	Support in part	Forest & Bird considers that the term "development" must also be specified in the provisions which refer to 'land use and subdivision'. "Development is specifically referred to in the NZCPS.	Insert "development," in front of land use and subdivision
Summit Forests New Zealand Limited (S148)	S148.032	Coastal environment	CE-P6	Not Stated	The chapter on the Coastal Environment fails to provide equitably for all primary production activities. In particular, it fails to recognise that, where plantation forestry already exists within the Coastal Environment, it should be considered as a legitimate part of the landscape and provided for as a permitted activity subject to the provisions of the NES-PF. While the notes to this chapter refer to the Plan's ability to establish more stringent rules than the NES-PF, no justification for this has been provided in the section 32 report and, doing so, would fail to meet the wider policies and objectives of the Plan for example PRROZ-01, RPROZ-03, RPROZ-04, and RPROZ-P1. Policy CE-P6 seeks to grandparent an existing land use that may be or could become unsustainable both in terms of economic and environmental effects. The Plan should allow for all primary production activities subject to managing any adverse effects.	Amend CE-P6 to read " Provide for primary production activities within the coastal environment where: a. the use forms part of the values that established natural character of the coastal environment; or b. the use is consistent with, and does not compromise the characteristics and qualities."
Horticulture New Zealand (S159)	S159.072	Coastal environment	CE-P6	Support in part	The use should be consistent with the surrounding land use - not just characteristics and qualities.	Amend Policy CE-P6 as follows: Enable farming activities within the coastal environment where:

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<ol style="list-style-type: none"> 1. the use forms part of the values that established natural character of the coastal environment; or 2. the use is consistent with surrounding land use, and does not compromise the characteristics and qualities.
Manulife Forest Management (NZ) Ltd (S160)	S160.025	Coastal environment	CE-P6	Oppose	The submitter is opposed to policy CE-P6 because it includes only one of the primary production sector which is not fair or equitable. Large tracts of forestry are already in the coastal environment, largely planted to prevent erosion to the coastal sand dunes. Plantation forestry is a valuable tool in the coastal environment to prevent ongoing erosion.	Amend policy CE-P6 to include primary production
Bentzen Farm Limited (S167)	S167.070	Coastal environment	CE-P6	Support in part	The qualifications that farming is only supported where "its use forms part of the values that established natural character of the coastal environment; or the use is consistent with, and does not compromise the characteristics and qualities", are unnecessary. The qualifications proposed in the policy are better managed by other overlays that are targeted to the management of specific resources.	Amend Policy CE-P6 as follows: Enable farming activities within the coastal environment where: a. the use forms part of the values that established natural character of the coastal environment; or b. the use is consistent with, and does not compromise the characteristics and qualities.
Wendover Two Limited (S222)	S222.062	Coastal environment	CE-P6	Support	The policy seeks to enable farming activities in the coastal environment and that part of the policy is supported. The qualifications that farming is only supported where "its use forms part of the values that established natural	Amend Policy CE-P6 as follows: Enable farming activities within the coastal environment where: a. the use forms part of the values

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					character of the coastal environment; or the use is consistent with, and does not compromise the characteristics and qualities", are unnecessary. Farming is a typical activity in the coastal environment in the Far North, and as recognised by the Proposed Plan, in many instances it defines its character. The qualifications proposed in the policy are better managed by other overlays that are targeted to the management of specific resources (for example indigenous vegetation clearance in the High and Outstanding Natural Character overlay).	that established natural character of the coastal environment; or b. the use is consistent with, and does not compromise the characteristics and qualities.
Matauri Trustee Limited (S243)	S243.088	Coastal environment	CE-P6	Support in part	The policy seeks to enable farming activities in the coastal environment and that part of the policy is supported. The qualifications that farming is only supported where "its use forms part of the values that established natural character of the coastal environment; or the use is consistent with, and does not compromise the characteristics and qualities", are unnecessary. Farming is a typical activity in the coastal environment in the Far North, and as recognised by the Proposed Plan, in many instances it defines its character. The qualifications proposed in the policy are better managed by other overlays that are targeted to the management of specific resources (for example indigenous vegetation clearance in the High and Outstanding Natural Character overlay).	Amend Policy CE-P6 as follows: Enable farming activities within the coastal environment where: a. the use forms part of the values that established natural character of the coastal environment; or b. the use is consistent with, and does not compromise the characteristics and qualities.
Director-General of Conservation (Department of Conservation) (S364)	S364.067	Coastal environment	CE-P6	Support in part	The coastal environment has value in of itself, not just in characteristics and qualities and the wording of the proposed policies should reflect this.	Amend Policy CE-P6 as follows: b. the use is consistent with, and does not compromise the characteristics and qualities coastal environment
Sarah Ballantyne and Dean	S386.011	Coastal environment	CE-P6	Support	Ballantyne & Agnew generally support the recognition of farming activities within the coastal environment, and that they contribute to the established values of these environments	Retain as notified.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Agnew (S386)						
Northland Federated Farmers of New Zealand (S421)	S421.184	Coastal environment	CE-P6	Oppose	Federated Farmers does not support policy CE-P6 as it is currently drafted. The policy has been written in such a way that it is implied that only existing farming activities can occur within the coastal environment. The scope of the policy needs to be broader to allow for new farming activities to occur within the coastal environments as well. Farmers needs to have the ability to diversify and change their farming operations into new areas that still fall under the concept of farming.	Amend Policy CE-P6 so that it specifically provides for new and existing farming activities to occur in the coastal environment as a right
John Andrew Riddell (S431)	S431.030	Coastal environment	CE-P6	Not Stated	The proposed Plan is set out in the atomistic way required by the National Planning Standards. As a consequence, in addition to the amendments sought to the Kororāreka Russell Township Zone provisions, there are amendments needed to other chapters of the proposed Plan, including the Coastal Environment Overlay, Historic Heritage and Subdivision provisions for the reasons set out with respect to the provisions in the Kororāreka Russell Township zone.	Amend Policy CE-P6, to replace 'Enable' with 'Provide for' and amend point b. to identify what characteristics and qualities are not be compromised
Kapiro Conservation Trust (S442)	S442.158	Coastal environment	CE-P6	Support in part	Contrary to Appendix 1, farming (pastoral agriculture) was not used as a value when mapping areas of at least high natural character for the RPS. Depending on how Policy CE-P6 is interpreted, farming use can be relevant if that includes protecting indigenous plants and animals.	Amend Policy CE-P6 to clarify: 1. What is included in the definition of farming 2. Recognise that farming has and can continue to have adverse effects on the coastal natural character of the Far North.
Pacific Ecology (S451)	S451.014	Coastal environment	CE-P6	Support in part	Contrary to Appendix 1, farming (pastoral agriculture) was not used as a value when mapping areas of at least high natural character for the RPS. Depending on how Policy CE-P6 is interpreted, farming use can be relevant if that includes protecting indigenous plants and animals.	Amend Policy CE-P6 to clarify: 1. What is included in the definition of farming 2. Recognise that farming has and can continue to have adverse effects on the coastal natural character of the Far North.
Waiaua Bay Farm	S463.055	Coastal environment	CE-P6	Oppose	It is unclear how sub-clause (a) could be operationalised in a resource consent	Delete Policy CE-P6 OR amend to clearly enable farming in the coastal

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Limited (S463)					<p>application context.</p> <p>Sub-clause (b) appears to be incomplete. Nevertheless, WBF observes that the requirement to be "consistent with, and does not compromise" is indicative of a de-facto requirement to avoid farming activities if these are deemed to "compromise" the unspecified "characteristics and qualities".</p> <p>Furthermore, this policy appears more tentative than Rule CE-R4, which permits farming in the coastal environment as long as it is done outside HNC or ONC areas.</p>	environment in line with Rule CE-R4.
John Andrew Riddell (S431)	S431.031	Coastal environment	CE-P7	Not Stated	<p>The proposed Plan is set out in the atomistic way required by the National Planning Standards. As a consequence, in addition to the amendments sought to the Kororāreka Russell Township Zone provisions, there are amendments needed to other chapters of the proposed Plan, including the Coastal Environment Overlay, Historic Heritage and Subdivision provisions for the reasons set out with respect to the provisions in the Kororāreka Russell Township zone.</p>	Amend point b. of Policy CE-P7 by identifying what characteristics and qualities are not to be compromised.
Bentzen Farm Limited (S167)	S167.071	Coastal environment	CE-P8	Support	<p>The natural character of the coastal environment is in many instances significantly modified or degraded and it is appropriate that the Proposed Plan encourages its restoration and enhancement to give effect to the NZCPS.</p>	Retain Policy CE-P8
Setar Thirty Six Limited (S168)	S168.070	Coastal environment	CE-P8	Support	<p>The natural character of the coastal environment is in many instances significantly modified or degraded and it is appropriate that the Proposed Plan encourages its restoration and enhancement to give effect to the NZCPS.</p>	Retain Policy CE-P8
The Shooting Box Limited (S187)	S187.061	Coastal environment	CE-P8	Support	<p>The natural character of the coastal environment is in many instances significantly modified or degraded and it is appropriate that the Proposed Plan encourages its restoration and enhancement to give effect to the NZCPS.</p>	Retain Policy CE-P8.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Wendover Two Limited (S222)	S222.063	Coastal environment	CE-P8	Support	The natural character of the coastal environment is in many instances significantly modified or degraded and it is appropriate that the Proposed Plan encourages its restoration and enhancement to give effect to the NZCPS.	Retain Policy CE-P8
Matauri Trustee Limited (S243)	S243.089	Coastal environment	CE-P8	Support	The natural character of the coastal environment is in many instances significantly modified or degraded and it is appropriate that the Proposed Plan encourages its restoration and enhancement to give effect to the NZCPS.	Retain Policy CE-P8
P S Yates Family Trust (S333)	S333.062	Coastal environment	CE-P8	Support	The natural character of the coastal environment is in many instances significantly modified or degraded and it is appropriate that the Proposed Plan encourages its restoration and enhancement to give effect to the NZCPS.	Retain Policy CE-P8
Director-General of Conservation (Department of Conservation) (S364)	S364.068	Coastal environment	CE-P8	Support in part	To better align Policy CE-P8 with Policy 14 of the NZCPS, the Director-General requests the replacement of "enhancement" with "rehabilitation". Enhancement is referenced in the NZCPS when referring to water quality and natural defences against coastal hazards, but not for natural character.	Amend Policy CE-P8 as follows: Encourage the restoration and enhancement-rehabilitation of the natural character of the coastal environment.
Bentzen Farm Limited (S167)	S167.072	Coastal environment	CE-P9	Oppose	This policy is not implemented by any rules and, moreover, is inconsistent with Policy CE-P2 which better gives effect to the NZCPS.	Delete Policy CE-P9
Setar Thirty Six Limited (S168)	S168.071	Coastal environment	CE-P9	Oppose	Policy CE-P9 seeks to prohibit land use and subdivision that would result in any loss and/or destruction of the characteristics and qualities in outstanding natural character areas. This policy is not implemented by any rules and, moreover, is inconsistent with Policy CE-P2 which better gives effect to the NZCPS.	Delete Policy CE-P9
The Shooting	S187.062	Coastal environment	CE-P9	Oppose	Policy CE-P9 seeks to prohibit land use and subdivision that would result in any loss and/or destruction of the characteristics and qualities in	Delete Policy CE-P9.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Box Limited (S187)					outstanding natural character areas. This policy is not implemented by any rules and, moreover, is inconsistent with Policy CE-P2 which better gives effect to the NZCPS.	
Wendover Two Limited (S222)	S222.064	Coastal environment	CE-P9	Oppose	Policy CE-P9 seeks to prohibit land use and subdivision that would result in any loss and/or destruction of the characteristics and qualities in outstanding natural character areas. This policy is not implemented by any rules and, moreover, is inconsistent with Policy CE-P2 which better gives effect to the NZCPS.	Delete Policy CE-P9
Matauri Trustee Limited (S243)	S243.090	Coastal environment	CE-P9	Oppose	Policy CE-P9 seeks to prohibit land use and subdivision that would result in any loss and/or destruction of the characteristics and qualities in outstanding natural character areas. This policy is not implemented by any rules and, moreover, is inconsistent with Policy CE-P2 which better gives effect to the NZCPS.	Delete Policy CE-P9
P S Yates Family Trust (S333)	S333.063	Coastal environment	CE-P9	Oppose	Policy CE-P9 seeks to prohibit land use and subdivision that would result in any loss and/or destruction of the characteristics and qualities in outstanding natural character areas. This policy is not implemented by any rules and, moreover, is inconsistent with Policy CE-P2 which better gives effect to the NZCPS.	Delete Policy CE-P9
Director-General of Conservation (Department of Conservation) (S364)	S364.069	Coastal environment	CE-P9	Support in part	Policy CE-P9 is generally supported by the Director-General as being consistent with Policies 13 and 15 of the NZCPS; however, the coastal environment has value in of itself, not just in characteristics and qualities and the wording should reflect this.	Amend Policy CE-P9 as follows: Prohibit land use and subdivision that would result in any loss and/or destruction of the characteristics and qualities in outstanding natural character areas.
Haititaimara ngai Marae Kaitiaki	S394.044	Coastal environment	CE-P9	Support in part	Largely support, though note that each characteristic or quality of ONL and ONF should attract protection to ensure protection on the round.	Amend Policy CE-P9 as follows: Prohibit land use and subdivision that would result in any loss and/or destruction of any of the

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Trust (S394)						characteristics and qualities in outstanding natural character areas.
Northland Federated Farmers of New Zealand (S421)	S421.185	Coastal environment	CE-P9	Oppose	Federated Farmers does not support policy CE-P9. The policy is inconsistent with section 6 of the Resource Management Act 1991 in that it appears to prohibit all land use and subdivision from all outstanding natural character areas located in the coastal environment. The policy as proposed is overly restrictive and does not provide for appropriate subdivision and land use to occur. It is not possible to undertake the sustainable management of the coastal environment if there is no framework that allows for appropriate activities with no more than minor effects to occur.	Delete Policy CE-P9
Kapiro Conservation Trust (S442)	S442.114	Coastal environment	CE-P9	Support in part	Forest & Bird considers that the term "development" must also be specified in the provisions which refer to 'land use and subdivision'. "Development is specifically referred to in the NZCPS.	Insert "development," in front of land use and subdivision.
Waiaua Bay Farm Limited (S463)	S463.056	Coastal environment	CE-P9	Oppose	Part of WBF's site is proposed to be included in the ONC80 area (151 Tepene Tablelands Road, Matauri Bay, being Lot 1 DP 199909 and Lot 8 DP 50236). WBF opposes the application of that layer to its property. For completeness, it also opposes this policy insofar as it would prohibit WBF's landscape maintenance activities and the upgrade and development of structures in the Totara Forest.	Delete ONC80 from SCHED8 - Schedule of Outstanding natural character and the mapping notation shown on 151 Tepene Tablelands Road, Matauri Bay, being Lot 1 DP 199909 and Lot 8 DP 50236 OR delete Policy CE-P9.
Royal Forest and Bird Protection Society of New Zealand (S511)	S511.095	Coastal environment	CE-P9	Support in part	Forest & Bird considers that the term "development" must also be specified in the provisions which refer to 'land use and subdivision'. "Development is specifically referred to in the NZCPS.	Insert "development," in front of land use and subdivision
Bentzen Farm	S167.073	Coastal environment	CE-P10	Oppose	This is not a policy but a method of assessment, and therefore more appropriately an assessment	Delete Policy CE-P10

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Limited (S167)					<p>criterion.</p> <p>Noncomplying and discretionary activity applications should be assessed against objectives and policies which should be a clear expression of a desired outcome - not a way to achieve an unspecified outcome as is this policy.</p>	
Setar Thirty Six Limited (S168)	S168.072	Coastal environment	CE-P10	Oppose	<p>Policy CE-P10 seeks to manage land use and subdivision to preserve and protect the natural character of the coastal environment, and to address the effects of the activity requiring resource consent, including (but not limited to) consideration of a range of matters "where relevant to the application".</p> <p>This is not a policy but a method of assessment, and therefore more appropriately an assessment criterion.</p> <p>Non-complying and discretionary activity applications should be assessed against objectives and policies which should be a clear expression of a desired outcome - not a way to achieve an unspecified outcome as is this policy.</p>	Delete Policy CE-P10
The Shooting Box Limited (S187)	S187.063	Coastal environment	CE-P10	Oppose	<p>Policy CE-P10 seeks to manage land use and subdivision to preserve and protect the natural character of the coastal environment, and to address the effects of the activity requiring resource consent, including (but not limited to) consideration of a range of matters "where relevant to the application".</p> <p>This is not a policy but a method of assessment, and therefore more appropriately an assessment criterion.</p> <p>Noncomplying and discretionary activity applications should be assessed against objectives and policies which should be a clear expression of a desired outcome - not a way to achieve an unspecified outcome as is this policy.</p>	Delete Policy CE-P10.
Wendover Two Limited (S222)	S222.065	Coastal environment	CE-P10	Oppose	<p>Policy CE-P10 seeks to manage land use and subdivision to preserve and protect the natural character of the coastal environment, and to</p>	Delete Policy CE-P10

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					<p>address the effects of the activity requiring resource consent, including (but not limited to) consideration of a range of matters "where relevant to the application". This is not a policy but a method of assessment, and therefore more appropriately an assessment criterion. Noncomplying and discretionary activity applications should be assessed against objectives and policies which should be a clear expression of a desired outcome - not a way to achieve an unspecified outcome as is this policy.</p>	
<p>Matauri Trustee Limited (S243)</p>	<p>S243.091</p>	<p>Coastal environment</p>	<p>CE-P10</p>	<p>Oppose</p>	<p>Policy CE-P10 seeks to manage land use and subdivision to preserve and protect the natural character of the coastal environment, and to address the effects of the activity requiring resource consent, including (but not limited to) consideration of a range of matters "where relevant to the application". This is not a policy but a method of assessment, and therefore more appropriately an assessment criterion. Non-complying and discretionary activity applications should be assessed against objectives and policies which should be a clear expression of a desired outcome - not a way to achieve an unspecified outcome as is this policy.</p>	<p>Delete Policy CE-P10</p>
<p>Willowridge Developments Limited (S250)</p>	<p>S250.015</p>	<p>Coastal environment</p>	<p>CE-P10</p>	<p>Support in part</p>	<p>Support FNDC's approach to provide a 'manage' policy to provide plan users and decision-makers key matters to consider as part of a resource consent. Clause (l) relates to the quality of coastal waters, this is considered to be a function of regional council and is considered inappropriate.</p>	<p>Amend CE-P10: Manage land use and subdivision to preserve and protect the natural character of the coastal environment, and to address the effects of the activity requiring resource consent, including (but not limited to) consideration of the following matters where relevant to the application: a. the presence or absence of buildings, structures or infrastructure; b. the temporary or permanent nature of any adverse effects; c. the location, scale and design of</p>

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

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						including ecological enhancement and / or restoration.
P S Yates Family Trust (S333)	S333.064	Coastal environment	CE-P10	Oppose	<p>Policy CE-P10 seeks to manage land use and subdivision to preserve and protect the natural character of the coastal environment, and to address the effects of the activity requiring resource consent, including (but not limited to) consideration of a range of matters "where relevant to the application". This is not a policy but a method of assessment, and therefore more appropriately an assessment criterion.</p> <p>Noncomplying and discretionary activity applications should be assessed against objectives and policies which should be a clear expression of a desired outcome - not a way to achieve an unspecified outcome as is this policy.</p>	Delete Policy CE-P10
Sarah Ballantyne and Dean Agnew (S386)	S386.012	Coastal environment	CE-P10	Support in part	<p>Ballantyne & Agnew support FNDC's approach to include a 'manage' policy to provide plan-users and decision-makers key matters to consider as part of a resource consent. Ballantyne & Agnew seek amendments to improve consistency and clarity. Clause (l) relates to the quality of coastal waters; this is considered to be a function of regional council and is considered inappropriate.</p>	<p>Amend CE-P10 as follows: "CE-P10 Manage land use and subdivision to preserve and protect the natural character of the coastal environment, and to address the effects of the activity requiring resource consent, including (but not limited to) consideration of the following matters where relevant to the application: a. the presence or absence of buildings, structures or infrastructure; b. the temporary or permanent nature of any adverse effects; c. the location, scale and design of any proposed development;</p>

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

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						qualities,including ecological enhancement and / or restoration."
John Andrew Riddell (S431)	S431.032	Coastal environment	CE-P10	Not Stated	Not stated	Insert additional point n. to Policy CE-P10 as follows: n. any cumulative effects
Kapiro Conservation Trust (S442)	S442.115	Coastal environment	CE-P10	Support	Forest & Bird considers that the term "development" must also be specified in the provisions which refer to 'land use and subdivision'. "Development is specifically referred to in the NZCPS.	Insert "development," in front of land use and subdivision.
Kapiro Conservation Trust (S442)	S442.159	Coastal environment	CE-P10	Support in part	Policy CE-P10 does not address all the effects that need to be addressed to protect coastal natural character.	Insert the following to the list of matters to be considered when Council assesses land use and subdivision consent applications: 1. The quality and extent of the indigenous ecosystems and elements present 2. The potential impact of the proposed activity on the natural character values of the native vegetation present on, and in the vicinity of, the property 3. The type and extent of legal and practical protection being provided to protect indigenous ecosystems and elements 4. The type and scale of ecological restoration and protective management being proposed (e.g., pest control) 5. The potential hazards posed by the construction and ongoing new activities on at-risk wildlife 6. Controls on pet ownership to protect at-risk wildlife 7. The level of anthropogenic sound

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						<p>that is likely during construction and with the ongoing new activities</p> <p>8. The level of anthropogenic night lighting proposed and its potential effect on indigenous species.</p> <p>9. The impact of the proposed development on the experiences of low-impact recreationists using public lands (including unformed legal roads) and the coastal marine area.</p> <p>10. The impacts of construction and long-term vehicle use on natural character</p> <p>11. Whether the development could hinder the ability of native ecosystems (e.g., saltmarsh) to migrate inland as sea levels rise</p>
<p>Pacific Eco-Logic (S451)</p>	<p>S451.015</p>	<p>Coastal environment</p>	<p>CE-P10</p>	<p>Support in part</p>	<p>Policy CE-P10 does not address all the effects that need to be addressed to protect coastal natural character</p>	<p>Insert the following to the list of matters to be considered when Council assesses land use and subdivision consent applications:</p> <p>7. The quality and extent of the indigenous ecosystems and elements present</p> <p>8. The potential impact of the proposed activity on the natural character values of the native vegetation present on, and in the vicinity of, the property</p> <p>9. The type and extent of legal and practical protection being provided to protect indigenous ecosystems and elements</p> <p>10. The type and scale of ecological restoration and protective management being proposed (e.g., pest control)</p> <p>11. The potential hazards posed by the construction and ongoing new activities on at-risk wildlife</p>

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						<p>12. Controls on pet ownership to protect at-risk wildlife</p> <p>13. The level of anthropogenic sound that is likely during construction and with the ongoing new activities</p> <p>14. The level of anthropogenic night lighting proposed and its potential effect on indigenous species.</p> <p>15. The impact of the proposed development on the experiences of low-impact recreationists using public lands (including unformed legal roads) and the coastal marine area.</p> <p>16. The impacts of construction and long-term vehicle use on natural character</p> <p>17. Whether the development could hinder the ability of native ecosystems (e.g., saltmarsh) to migrate inland as sea levels rise</p>
Waiaua Bay Farm Limited (S463)	S463.059	Coastal environment	CE-P10	Oppose	<p>Sub-clauses (a) to (m) are a list of assessment matters that are inappropriate to be included in a policy. They do not provide direction about how to achieve the overarching objectives.</p> <p>WBF recommends deletion of the policy and reliance on the remaining policies. If necessary, the assessment criteria can be relocated to rules and standards of the infrastructure chapter.</p>	Delete Policy CE-P10
Royal Forest and Bird Protection Society of New Zealand (S511)	S511.096	Coastal environment	CE-P10	Support in part	<p>Forest & Bird considers that the term "development" must also be specified in the provisions which refer to 'land use and subdivision'. "Development is specifically referred to in the NZCPS.</p>	Insert "development," in front of land use and subdivision.
Bayswater Inn Ltd (S29)	S29.005	Coastal environment	Rules	Oppose	<p>Coastal Environment Overlay - With regard to the inclusion of 40 Marsden Road, Paihia, in the coastal environment overlay, the PDP has</p>	Amend the coastal environment provisions to exempt existing/established urban areas

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					introduced new rules which have an impact on the subdivision status, along with the future development of the sites. The creation of lots in the coastal environment would in terms of subdivision be assessed as a Discretionary Activity, whereas it is currently a Controlled Activity. Some of the restrictions on future development are illogical and unreasonable	(including 40 Marsden Road, Paihia) from the restrictions on future development including: <ul style="list-style-type: none"> • maximum floor area of 300 m² • maximum extension of 20% • limits on excavation and filling • maximum height of 5 metres • additional controls on indigenous vegetation removal • subdivision as a discretionary activity
Good Journey Limited (S82)	S82.011	Coastal environment	Rules	Oppose	The rules of the Coastal Environment Overlay are not supported by appropriate analysis, do not meet the provisions of s.32 of the Act, and do not accord with Part II of the RMA 1991. The rules within the Coastal Environment overlay do not recognise different attributes and apply a generic set of rules that are unwarranted in an urban environment. The net effect of the coastal environment overlay provisions is that all newly built form or extensions within an urban zoned area (which contains both residential and mixed use development zones) will trigger full discretionary resource consent for any development which exceeds one storey in height, exceeds the height of the nearest ridgeline, increases the floor area by more than 20%, is not finished in a BS5252 colour palette and has a reflectance value greater than 30%.	Delete the requirements for resource consent for building additions exceeding 20% in GFA, buildings exceeding one storey in height, reference to specific colours and reflectivity limitations in urban areas
PF Olsen Limited (S91)	S91.015	Coastal environment	Rules	Oppose	There is no justification to require plantation forestry earthworks to comply with more stringent standards for earthworks in the Coastal Environment overlay, and for those standards to also not equally apply to other primary	Amend the rules for plantation forestry activities in the Coastal Environment overlay limiting to only apply to plantation forestry earthworks.

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					<p>production land use.</p> <p>Rules in the Coastal Environment overlay are already in the plan for plantation forestry activities in these overlays. Plantation forestry activities include earthworks.</p> <p>Earthworks are undertaken in the main to provide access and infrastructure. The proposed standards might be applicable to land recontouring activities but not earthworks for plantation forestry.</p> <p>The drafting provides a legal nonsense in that replanting plantation forest is a discretionary activity (under rules NFL-R5 and CE-R6) but is required for the earthworks to be permitted under this standard and rule EW-R7.</p> <p>The earthworks Matters of Discretion go well beyond the scope of the District Council's powers under section 31 of the Resource Management Act.</p>	<p>Delete the irrelevant Matters of Discretion for earthworks in natural character areas of the Coastal Environment overlay.</p> <p>Amend the rules to provide consistency of application for primary production activities.</p>
Summit Forests New Zealand Limited (S148)	S148.034	Coastal environment	Rules	Not Stated	<p>The chapter on the Coastal Environment fails to provide equitably for all primary production activities. In particular, it fails to recognise that, where plantation forestry already exists within the Coastal Environment, it should be considered as a legitimate part of the landscape and provided for as a permitted activity subject to the provisions of the NES-PF.</p> <p>While the notes to this chapter refer to the Plan's ability to establish more stringent rules than the NES-PF, no justification for this has been provided in the section 32 report and, doing so, would fail to meet the wider policies and objectives of the Plan for example PRROZ-01, RPROZ-03, RPROZ-04, and RPROZ-P1.</p>	Amend rules to provide for existing Plantation Forestry and Plantation Forestry Activities in the coastal environment as a permitted activity subject to the provisions of the NES-PF
Bentzen Farm Limited (S167)	S167.075	Coastal environment	Rules	Oppose	<p>There is no need not be a rule for an activity class of repair and maintenance. Repairs and maintenance should be otherwise be permitted under the respective rules relating to the buildings, earthworks and indigenous vegetation clearance activity classes within the overlay.</p> <p>Unforeseen consequences will result with the rule as drafted where classes of repairs and</p>	Insert new rule as follows: " New buildings or structures, and extensions or alterations to existing buildings or structures within an approved building platform or buildable area on a

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					<p>maintenance not listed will fall to discretionary activity, triggering costly and unnecessary consent processes. As drafted in rule CE-R1, where these occur in the coastal areas and are within an ONL/ONF, the activity status of dwellings defaults to non-complying, regardless of prior entitlements provided by subdivision.</p> <p>In many cases, the subdivisions have been carefully designed and have detailed controls imposed by way of consent condition and consent notices on the titles to manage the effects of buildings. Owners have purchased lots on the understanding that their entitlement to build on them is protected.</p> <p>Controlled activity is an appropriate activity class because the Council will have already assessed appropriations in such circumstance and all that may be required will be an evaluation against the conditions of the subdivision consent/consent notices.</p> <p>Non-notification is also appropriate as the substantive consideration as to whether a building is acceptable on the approved building platform will have occurred already at subdivision stage.</p>	<p>site for which a subdivision consent was granted after 1 January 2000"</p> <p>Specify the activity status as controlled activity</p> <p>Include the following matter of control:2. Compliance with location, height, design and mitigation conditions which apply to the site or building platform by way of resource consent condition or consent notice.</p> <p>Include the following clause:Building/s which are a controlled activity under this rule shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</p>
<p>Setar Thirty Six Limited (S168)</p>	<p>S168.074</p>	<p>Coastal environment</p>	<p>Rules</p>	<p>Oppose</p>	<p>There is no need not to be a rule for an activity class of repair and maintenance. Repairs and maintenance should otherwise be permitted under the respective rules relating to the buildings, earthworks and indigenous vegetation clearance activity classes within the overlay. Those rules (as sought to be amended by this submission) most effectively and efficiently manage the effects of relevant activities on the resources managed by the overlay.</p>	<p>Insert new rule as follows:"New buildings or structures, and extensions or alterations to existing buildings or structures within an approved building platform or buildable area on a site for which a subdivision consent was granted after 1</p>

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					<p>Unforeseen consequences will result with the rule as drafted where classes of repairs and maintenance not listed will fall to discretionary activity, triggering costly and unnecessary consent processes.</p> <p>As drafted in rule CE-R1, where these occur in the coastal areas and are within an ONL/ONF, the activity status of dwellings defaults to non-complying, regardless of prior entitlements provided by subdivision.</p> <p>In many cases, the subdivisions have been carefully designed and have detailed controls imposed by way of consent condition and consent notices on the titles to manage the effects of buildings. Owners have purchased lots on the understanding that their entitlement to build on them is protected.</p> <p>The default to non-complying activity would require a wholesale reassessment of the appropriateness to build on an approved building platform. It imposes considerable unnecessary cost and risk to current owners.</p> <p>Controlled activity is an appropriate activity class because the Council will have already assessed appropriations in such circumstance and all that may be required will be an evaluation against the conditions of the subdivision consent/consent notices.</p> <p>Typically, such subdivisions have occurred in more recent times and so a cut-off date as proposed in the relief may also be appropriate. Non-notification is also appropriate as the substantive consideration as to whether a building is acceptable on the approved building platform will have occurred already at subdivision stage.</p>	<p>January 2000" Specify the activity status as controlled activity Insert the following matter of control:1. Compliance with location, height, design and mitigation conditions which apply to the site or building platform by way of resource consent condition or consent notice. Insert the following clause: Building/s which are a controlled activity under this rule shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</p>
<p>Russell Protection Society (INC) (S179)</p>	<p>S179.070</p>	<p>Coastal environment</p>	<p>Rules</p>	<p>Support</p>	<p>In view of the fact that coastal zones are not provided for in the Proposed district plan, then the Coastal Environment, Natural Character and Natural Features and Landscape Overlays become very important in helping to define the boundaries of Russell and in safeguarding a</p>	<p>Retain rules</p>

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					suitable backdrop or canvass which to interpret and appreciate the historic township. It is especially important that these overlays provide adequate protection to the headlands framing Russell and the natural coastal escarpments that characterize the balance of the Russell Peninsula. For this reason it is important to control subdivision and development of coastal lands in the area.	
MLP LLC (S183)	S183.005	Coastal environment	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Landing Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
The Shooting Box Limited (S187)	S187.065	Coastal environment	Rules	Oppose	Refer to submission for detailed reasons for decision(s) requested relating, but not limited to, the following: there is no need not be a rule for an activity class of repair and maintenance; repair and maintenance should be otherwise be permitted under the respective rules relating to the buildings, earthworks and indigenous vegetation clearance activity classes within the overlay; repairs and maintenance not listed will fall into discretionary activity, triggering costly and unnecessary consent processes; CE-R1, where these occur in the coastal areas and are within an ONL/ONF, the activity status of dwellings defaults to non-complying, regardless of prior entitlements provided by subdivision; default to non-complying activity would require a wholesale reassessment of the appropriateness to build on an approved building platform; controlled activity is an appropriate activity class - Council will have already assessed appropriateness in such circumstance and all that may be required will be an evaluation against the conditions of the subdivision consent/consent notices; non-notification is	Amend to add new rule as follows: "New buildings or structures, and extensions or alterations to existing buildings or structures within an approved building platform or buildable area on a site for which a subdivision consent was granted after 1 January 2000" Specify the activity status as controlled activity Include the following matter of control: 1. Compliance with location, height, design and mitigation conditions which apply to the site or building platform by way of resource consent condition or consent notice. Include the following clause: Building/s which are a controlled activity under this rule shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances

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					appropriate as to whether a building is acceptable on the approved building platform will have occurred already at subdivision stage.	exist or notification is required under section 95B(2) and (3).
Wendover Two Limited (S222)	S222.067	Coastal environment	Rules	Support	<p>There is no need not be a rule for an activity class of repair and maintenance. Repairs and maintenance should be otherwise be permitted under the respective rules relating to the buildings, earthworks and indigenous vegetation clearance activity classes within the overlay. Those rules (as sought to be amended by this submission) most effectively and efficiently manage the effects of relevant activities on the resources managed by the overlay. Unforeseen consequences will result with the rule as drafted where classes of repairs and maintenance not listed will fall to discretionary activity, triggering costly and unnecessary consent processes. An example is existing houses in the ONF and ONL, whereby their repair and maintenance (including any normal domestic maintenance) would trigger a full discretionary activity resource consent because they are not specified in the repair or maintenance rule. This form of rule is proposed to be carried over into the Proposed Plan, and so may result in more such forms of subdivision.</p> <p>As drafted in rule CE-R1, where these occur in the coastal areas and are within an ONL/ONF, the activity status of dwellings defaults to non-complying, regardless of prior entitlements provided by subdivision. In many cases, the subdivisions have been carefully designed and have detailed controls imposed by way of consent condition and consent notices on the titles to manage the effects of buildings. Owners have purchased lots on the understanding that their entitlement to build on them is protected. The default to non-complying activity would require a wholesale reassessment of the appropriateness to build on an approved building</p>	<p>Add new rule as follows: "New buildings or structures, and extensions or alterations to existing buildings or structures within an approved building platform or buildable area on a site for which a subdivision consent was granted after 1 January 2000"</p> <p>Specify the activity status as controlled activity</p> <p>Insert the following matter of control: 2. Compliance with location, height, design and mitigation conditions which apply to the site or building platform by way of resource consent condition or consent notice.</p> <p>Insert the following clause: Building/s which are a controlled activity under this rule shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</p>

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					<p>platform. It imposes considerable unnecessary cost and risk to current owners.</p> <p>Controlled activity is an appropriate activity class because the Council will have already assessed appropriations in such circumstance and all that may be required will be an evaluation against the conditions of the subdivision consent/consent notices.</p> <p>Typically, such subdivisions have occurred in more recent times and so a cut-off date as proposed in the relief may also be appropriate. Non-notification is also appropriate as the substantive consideration as to whether a building is acceptable on the approved building platform will have occurred already at subdivision stage. A similar provision is in the Operative Whangarei District Plan 2022</p>	
Tryphena Trustees Limited, David Haythornwaite (S226)	S226.005	Coastal environment	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
Isles Casey Trustee Services Limited, WWC Trustee Company Limited (S227)	S227.005	Coastal environment	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
Jayesh Govind and Others (S228)	S228.005	Coastal environment	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required

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					the purpose of the Resource Management Act 1991 (RMA).	to give effect to this submission.
Laurie Pearson (S229)	S229.005	Coastal environment	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
Mataka Residents' Association Inc (S230)	S230.005	Coastal environment	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA)	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
Ovisnegra Limited (S231)	S231.005	Coastal environment	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
Tobias Groser (S232)	S232.005	Coastal environment	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
Whale Bay Limited (S233)	S233.005	Coastal environment	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect

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					functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	to this submission, or any other consequential relief required to give effect to this submission.
Whale Bay Limited (S234)	S234.005	Coastal environment	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
WW Trustee Services 2016 Limited, Eloise Caroline Caswell, Donald Gordon Chandler (S235)	S235.005	Coastal environment	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
Connemara Black Limited (S236)	S236.005	Coastal environment	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
Evan Williams and Katherine Williams (S237)	S237.005	Coastal environment	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.

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					the purpose of the Resource Management Act 1991 (RMA).	
John Gowing and Miriam Van Lith (S238)	S238.005	Coastal environment	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
John Gowing, Miriam Van Lith, Ellis Gowing, James Gowing, Byron Gowing (S239)	S239.005	Coastal environment	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
Matthew Watson, Kaylene Watson, D R Thomas Limited (S240)	S240.005	Coastal environment	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
Matthew Draper and Michaela Jannard (S241)	S241.005	Coastal environment	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
Matauri Trustee	S243.093	Coastal environment	Rules	Oppose	There is no need not be a rule for an activity class of repair and maintenance. Repairs and maintenance should be otherwise	Insert new rule as follows: New buildings or structures, and

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Limited (S243)					<p>be permitted under the respective rules relating to the buildings, earthworks and indigenous vegetation clearance activity classes within the overlay.</p> <p>Those rules (as sought to be amended by this submission) most effectively and efficiently manage the effects of relevant activities on the resources managed by the overlay.</p> <p>Unforeseen consequences will result with the rule as drafted where classes of repairs and maintenance not listed will fall to discretionary activity, triggering costly and unnecessary consent processes. An example is existing houses in the ONF and ONL, whereby their repair and maintenance (including any normal domestic maintenance) would trigger a full discretionary activity resource consent because they are not specified in the repair or maintenance rule.</p> <p>This form of rule is proposed to be carried over into the Proposed Plan, and so may result in more such forms of subdivision.</p> <p>As drafted in rule CE-R1, where these occur in the coastal areas and are within an ONL/ONF, the activity status of dwellings defaults to non-complying, regardless of prior entitlements provided by subdivision.</p> <p>In many cases, the subdivisions have been carefully designed and have detailed controls imposed by way of consent condition and consent notices on the titles to manage the effects of buildings. Owners have purchased lots on the understanding that their entitlement to build on them is protected.</p> <p>The default to non-complying activity would require a wholesale reassessment of the appropriateness to build on an approved building platform. It imposes considerable unnecessary cost and risk to current owners.</p> <p>Controlled activity is an appropriate activity class because the Council will have already assessed appropriations in such circumstance and all that</p>	<p>extensions or alterations to existing buildings or structures within an approved building platform or buildable area on a site for which a subdivision consent was granted after 1 January 2000</p> <p>Specify the activity status as controlled activity</p> <p>Include the following matter of control:1. Compliance with location, height, design and mitigation conditions which apply to the site or building platform by way of resource consent condition or consent notice.</p> <p>Include the following clause:Building/s which are a controlled activity under this rule shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</p>

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					<p>may be required will be an evaluation against the conditions of the subdivision consent/consent notices.</p> <p>Typically, such subdivisions have occurred in more recent times and so a cut-off date as proposed in the relief may also be appropriate. Non-notification is also appropriate as the substantive consideration as to whether a building is acceptable on the approved building platform will have occurred already at subdivision stage.</p>	
Nicole Wooster (S259)	S259.022	Coastal environment	Rules	Support in part	<p>A portion of the access to our property is via a peice of legal road, which has never been maintained by the council since it was formed in the 1930s as it is the end of the road and is only used by us. We are not covered by the road designation as the requiring authority doesn't look after it. However, if we needed to upgrade it to provide better access or to get a larger vehicle in we would need to get a resource consent even though it's an existing road.</p>	<p>Amend rules to provide for road upgrades as a permitted activity (inferred from submission), or alter the location of the coastal environment mapping to not include the road (also see S259.023)</p>
The Paihia Property Owners Group (S330)	S330.003	Coastal environment	Rules	Support in part	<p>The submitter supports in part rules in the Coastal Environment (inferred), however the PDP approach does not appropriately justify the provisions as no specific locality assessments have been undertaken to suggest that they are appropriate in a highly modified urban environment such as Paihia.</p>	<p>Amend rules in the Coastal Environment (inferred) to promote more enabling and appropriate provisions as they relate to urban areas such as Paihia.</p>
P S Yates Family Trust (S333)	S333.066	Coastal environment	Rules	Not Stated	<p>There is no need not be a rule for an activity class of repair and maintenance. Repairs and maintenance should be otherwise be permitted under the respective rules relating to the buildings, earthworks and indigenous vegetation clearance activity classes within the overlay. Those rules (as sought to be amended by this submission) most effectively and efficiently manage the effects of relevant activities on the resources managed by the overlay.</p> <p>Unforeseen consequences will result with the rule as drafted where classes of repairs and maintenance not listed will fall to discretionary</p>	<p>Insert new rule as follows: "New buildings or structures, and extensions or alterations to existing buildings or structures within an approved building platform or buildable area on a site for which a subdivision consent was granted after 1 January 2000"</p> <p>Specify the activity status as controlled activity</p>

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					<p>activity, triggering costly and unnecessary consent processes. An example is existing houses in the ONF and ONL, whereby their repair and maintenance (including any normal domestic maintenance) would trigger a full discretionary activity resource consent because they are not specified in the repair or maintenance rule.</p> <p>This form of rule is proposed to be carried over into the Proposed Plan, and so may result in more such forms of subdivision.</p> <p>As drafted in rule CE-R1, where these occur in the coastal areas and are within an ONL/ONF, the activity status of dwellings defaults to non-complying, regardless of prior entitlements provided by subdivision.</p> <p>In many cases, the subdivisions have been carefully designed and have detailed controls imposed by way of consent condition and consent notices on the titles to manage the effects of buildings. Owners have purchased lots on the understanding that their entitlement to build on them is protected.</p> <p>The default to non-complying activity would require a wholesale reassessment of the appropriateness to build on an approved building platform. It imposes considerable unnecessary cost and risk to current owners.</p> <p>Controlled activity is an appropriate activity class because the Council will have already assessed appropriations in such circumstance and all that may be required will be an evaluation against the conditions of the subdivision consent/consent notices. Typically, such subdivisions have occurred in more recent times and so a cut-off date as proposed in the relief may also be appropriate.</p> <p>Non-notification is also appropriate as the substantive consideration as to whether a building is acceptable on the approved building platform will have occurred already at subdivision stage.</p>	<p>Include the following matter of control:1. Compliance with location, height, design and mitigation conditions which apply to the site or building platform by way of resource consent condition or consent notice.</p> <p>Include the following clause:Building/s which are a controlled activity under this rule shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</p>

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					A similar provision is in the Operative Whangarei District Plan 2022	
Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd (S344)	S344.018	Coastal environment	Rules	Not Stated	The default to discretionary activity for all activities within the HNCA is onerous and potential effects can be appropriately managed through a restricted discretionary activity status, with targeted matters of discretion, as opposed to a blanket discretionary status.	Amend rules to default to restricted discretionary activity inside the high natural character area.
Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd (S344)	S344.043	Coastal environment	Rules	Not Stated	The submitter has identified that the overlay chapters are inconsistent with respect to referencing rules for "activities not otherwise listed". The How the Plan Works chapter includes a statement that some overlays will automatically default to a permitted activity. Noting that resource consent may still be required under other Part 2: District-wide Matters chapters and/or Part 3: Area-Specific chapters (including the underlying zone). This lack of consistency will cause confusion for plan users: <ol style="list-style-type: none"> 1. The overlay chapters do not include notes to this effect. 2. Each overlay chapter has a different approach activity status default rules. 3. Overlays and zone chapters use different terminology. Applying an automatic permitted activity default could lead to unintentional consequences.	Amend all relevant overlay chapters as necessary to insert rules for "Activities not otherwise listed in this chapter" consistent with zone chapters.
Nicole Way and Christopher Huljich as Trustees of the Trssh Birnie Settlement Trust (S345)	S345.007	Coastal environment	Rules	Oppose	The Resource Consents at Mataka Station enable development, and completion of the Mataka Station development, notwithstanding the provisions of the Proposed District Plan. The Proposed District Plan fails to recognise, have regard to, or provide for the development and subdivision enabled by the Resource Consents. The Proposed District Plan provisions will restrict development of the Property, and Mataka Station more generally, in a manner that is	Amend to explicitly, and specifically provide for, and preserve the activities and land uses authorised under the Resource Consents at Mataka Station. and/or Insert a new special purpose zone and/or structure plan together with appropriate provisions (objectives, policies and rules) enabling the residential activity and

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					<p>inconsistent with the Resource Consents and the integrated and comprehensive development authorised by those. The Council's s32 analysis does not mention, or consider approved but unimplemented developments within the Property and Mataka Station more generally, nor elsewhere. The "low intensity" development controls and height limits proposed within the Coastal Environment are given very little analysis.</p> <p>The proposed provisions are inconsistent with the Act and relevant planning instruments.</p>	<p>development as is authorised by the Resource Consents as a permitted activity (where they are in general accordance with the Resource Consents) as well as appropriate activities within the Rural Production Zone, regardless of the provisions of the CE, ONL or HNC.</p> <p>and/or</p> <p>Amend the provisions of the Proposed District Plan to preserve the activities and buildings authorised by the Resource Consents on the Property.</p>
Philibert Jean-G Frick (S352)	S352.005	Coastal environment	Rules	Oppose	<p>The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA).</p>	<p>Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.</p>
Northland Regional Council (S359)	S359.031	Coastal environment	Rules	Support in part	<p>There is potential for unintended consequences of the rules in the Coastal Environment as new fencing requires resource consent.</p>	<p>Amend the rules to expand the permitted activity rule to allow for fencing within natural character areas, ONLs and ONFs where fencing is required for protection or enhancement of soil conservation treatments, water bodies and wetlands and in line with the Stock Exclusion Regulations and/or regional plan rules.</p>
Foodstuffs North Island Limited (S363)	S363.035	Coastal environment	Rules	Not Stated	<p>The submitter has identified that the overlay chapters are inconsistent with respect to referencing rules for "activities not otherwise listed". The How the Plan Works chapter includes a statement that some overlays will automatically default to a permitted activity.</p>	<p>Amend all relevant overlay chapters as necessary to insert rules for "Activities not otherwise listed in this chapter" consistent with zone chapters.</p>

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					<p>Noting that resource consent may still be required under other Part 2: District-wide Matters chapters and/or Part 3: Area-Specific chapters (including the underlying zone). This lack of consistency will cause confusion for plan users:</p> <ol style="list-style-type: none"> 1. The overlay chapters do not include notes to this effect. 2. Each overlay chapter has a different approach activity status default rules. 3. Overlays and zone chapters use different terminology. <p>Applying an automatic permitted activity default could lead to unintentional consequences.</p>	
Maurice Dabbah (S422)	S422.005	Coastal environment	Rules	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend any other provisions including alternative status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
Bernard Sabrier (S423)	S423.005	Coastal environment	Rules	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
Francois Dotta (S434)	S434.005	Coastal environment	Rules	Oppose	The Proposed Plan, if approved, will directly affect members of the [Mataka Residents] Association by imposing undue restrictions on the construction of residential dwellings on the Site through the application of specified overlays and rules.	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other consequential relief required to give effect to this submission.
Elka Gouzer (S435)	S435.005	Coastal environment	Rules	Oppose	The provisions fail to provide for residential activity in accordance with the consented Mataka Scheme, do not represent the most appropriate way of exercising the Council's functions, will not promote the sustainable	Amend any other provisions including alternative activity status rules, matters for discretion and assessment criteria that give effect to this submission, or any other

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					management of natural and physical resources and are not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA)	consequential relief required to give effect to this submission.
Kapiro Conservation Trust (S442)	S442.162	Coastal environment	Rules	Not Stated	Isolated mature kowhai, puriri and pohutukawa trees in the coastal environment may not be adequately protected in the district plan as some patches did not meet the Northland Regional Council minimum mapping unit size and so were not included within an area of high or outstanding natural character.	Insert a rule that requires consent to fell or significantly prune isolated mature indigenous trees such as pohutukawa within the coastal environment Or Expand Schedule 1 - Schedule of Notable trees to include all these trees.
Pacific Eco-Logic (S451)	S451.018	Coastal environment	Rules	Not Stated	Isolated mature kowhai, puriri and pohutukawa trees in the coastal environment may not be adequately protected in the district plan as some patches did not meet the Northland Regional Council minimum mapping unit size and so were not included within an area of high or outstanding natural character	Insert a rule that requires consent to fell or significantly prune isolated mature indigenous trees such as pohutukawa within the coastal environment OR Expand Schedule 1 - Schedule of Notable trees to include all these trees
Woolworths New Zealand Limited (S458)	S458.003	Coastal environment	Rules	Support in part	The activity status in the Coastal Environment where there is a non-compliance with the GFA for a newbuilding is not currently stated in the plan unless it is located in a more sensitive (high natural character area or outstanding natural character area). The subject site is not within either of these, and as such there is a current gap in the rule framework. Where a non-compliance with the GFA of an addition/alteration occurs, resource consent appears to be required as a Discretionary Activity under CE-R1. This is considered unnecessary for buildings that are provided for within the underlying zone and not located within a more sensitive area. It is considered that this should be provided for as a Restricted Discretionary Activity.	Amend to provide for the non-compliance with gross floor area of a new building in the Coastal Environment as a Restricted Discretionary Activity, noting that there is currently no consenting pathway provided in the Proposed District Plan for this non-compliance.

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Top Energy Limited (S483)	S483.174	Coastal environment	Rules	Not Stated	<p>Top Energy notes that most of the provisions included in the draft Plan relating to network utilities and regionally significant infrastructure have been removed, as have some provisions relating to existing power lines and other infrastructure within the coastal environment. Given that these network utilities are already present in the landscape, Top Energy seeks to ensure that they can be appropriately upgraded to meet the demands of technology, and ensure continued resilient supply to the rural coastal communities. Top Energy also notes that, given the interdependencies of Top Energy's networks, some of the lower voltage lines within these rural coastal communities meet the criteria of Regionally Significant.</p> <p>Currently there is no provision for minor upgrade to network utilities where compliance cannot be achieved with CER1 PER.3 and PER 4. Accordingly Top Energy seeks that a rule be added that specifically provides for upgrades to network utilities as a permitted activity.</p> <p>The inclusion of this rule results in better alignment with the NZCPS specifically policy 6.1.a, as well as the RPS policies 5.2.2 and 5.3.2 in particular.</p>	<p>Insert a new rule as follows:CE-RX Upgrade of electricity network utilities Activity Status: Permitted Where:PER - 1 The upgrade of electricity network utility structures or buildings: 1. is within 5m of the existing alignment location of the original structure or building; 3. does not increase the gross floor area by more than 30 percent in a 10-year period if it is a building; 4. complies with the zones permitted setback standards if it is a building; 5. does not result in pole or tower height that exceeds 25m above ground level; 6. does not result in more than two additional poles; 7. does not result in additional towers; 8. any additional cross arms do not exceed a length of more than 4m.</p>
William Goodfellow (S493)	S493.007	Coastal environment	Rules	Support in part	<p>The submitter also considers that the activity status and standards imposed on activities within the coastal environment are unnecessarily onerous.</p>	<p>Amend to allow farming within the coastal environment and High Natural Character Overlay as a permitted activity.</p>
Ian Jepson (S494)	S494.007	Coastal environment	Rules	Support in part	<p>As a corollary to the above, the submitter considers that the proposed standards that apply to activities located within the overlays identified above would limit the reasonable development of land within the overlay to an extent that is</p>	<p>Amend to allow farming within the coastal environment and High Natural Character Overlay as a permitted activity.</p>

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					unnecessarily onerous and inconsistent with the purpose of the Act.	
Ngā Tai Ora - Public Health Northland (S516)	S516.083	Coastal environment	Rules	Not Stated	<p>The submitter has identified that the overlay chapters are inconsistent with respect to referencing rules for "activities not otherwise listed". The How the Plan Works chapter includes a statement that some overlays will automatically default to a permitted activity. Noting that resource consent may still be required under other Part 2: District-wide Matters chapters and/or Part 3: Area-Specific chapters (including the underlying zone). This lack of consistency will cause confusion for plan users:</p> <ol style="list-style-type: none"> 1. The overlay chapters do not include notes to this effect. 2. Each overlay chapter has a different approach activity status default rules. 3. Overlays and zone chapters use different terminology. <p>Applying an automatic permitted activity default could lead to unintentional consequences.</p>	Amend all relevant overlay chapters as necessary to insert rules for "Activities not otherwise listed in this chapter" consistent with zone chapters.
Vaughan Norton-Taylor (S536)	S536.006	Coastal environment	Rules	Oppose	Now all activities are discretionary and not permitted. No logic or reason are given for this change.	Amend the rules to allow activities (inferred)
Lucklaw Farm Ltd (S550)	S550.001	Coastal environment	Rules	Not Stated	<p>The submitter, Lucklaw Farm Ltd, is concerned with the current level of vehicle usage in and around the foreshore and coastal marine area and seeks better protection of these areas through more restrictive rules on vehicle use in these areas. Under Rule C.1.5.1. (vehicles on beaches) of the proposed Northland Regional Plan as notified, it is stated that "District Councils may also have bylaws that control (including prohibiting) the use of vehicles on beaches as well as dunes...compliance with Rules C.1.5.1. and C.1.5.1A does not remove the need to comply with all relevant bylaw provisions".</p> <p>Lucklaw Farm acknowledges that the previous Far North District Council (FNDC) bylaw on</p>	insert a comprehensive rule in the FNDC district plan which sets out standards for vehicle access on beaches and restricts use of the foreshore and seabed by vehicles except for specific purposes

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					<p>vehicles on beaches (Vehicles on Beaches Bylaw 2015) was automatically revoked in 2022 by operation of s160A of the Local Government Act 2002. Part 8 of the Road Use Bylaw 2022 now contains those rules related to vehicle use on beaches in the Far North. Under the Part 8 of the Road Use Bylaw, vehicles are only prohibited at Coopers Beach (see Schedule 6, Road Use Bylaw), and there are no beaches or parts of beaches where vehicle use is restricted (see Schedule 7, Road Use Bylaw). The Road Use Bylaw does not contain any other rules related to vehicle usage on beaches.</p> <p>Lucklaw Farm submits that the more detailed rules and standards regarding vehicle usage on beaches should be contained within the FNDC District Plan. Schedule 1 is an extract from the Bay of Plenty Regional Coastal Environment Plan, Rule DD7 which is the rule related to vehicle access on beaches.</p> <p>Rule DD7 operates in conjunction with Rule DD8 (also in Schedule 1) which permits vehicle use on the foreshore and seabed for emergency or law enforcement purposes</p>	
<p>The Paihia Property Owners Group (S565)</p>	<p>S565.004</p>	<p>Coastal environment</p>	<p>Rules</p>	<p>Support in part</p>	<p>The report provided by Melean Absolum Limited, that supports the Coastal Environment s32 Report prepared by Council, only suggests potential rules for the Coastal Environment within an urban area. There is no detailed evidence provided within either report to support these 'suggestions'. The PDP includes to rules such as a 5m height limit, 300m2 building / floor area coverage, and 400m2 indigenous vegetation and earthworks limits within an urban area. There is limited rationale as to why and how these provisions were selected. it is not clear why 5m was selected, or why this height limit is appropriate. No specific locality assessments have been undertaken specifically to suggest that this is appropriate in a highly modified urban environment such as Paihia.</p>	<p>Amend the rules withinthe Coastal Environment to promote more enabling and appropriate provisions as they relate to urban areas such as Paihia.</p>

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Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd (S344)	S344.032	Coastal environment	Notes	Support	The MUZ appears to have an unusual mix of activities permitted, with an onerous default to discretionary activity status. Due to the complicated nature of the commercial activities rules and the lack of definitions we are unable to confirm what activities would be permitted onsite. Both the MUZ and CE state that any activity not specifically provided for requires consent for a discretionary activity.	Amend to clarify the relationship between the zone and overlay rules.
Kapiro Conservation Trust (S442)	S442.116	Coastal environment	Notes	Support in part	For some reason Note 3 only refers to the Earthworks chapter. When Rule CE-R3 applies to both Earthworks and indigenous vegetation clearance. This note should also relate to the Ecosystems and Indigenous Biodiversity Chapter There may be further significant indigenous biodiversity beyond the areas identified as SNA in the overlays where preservation and protection is required in accordance with Policy 11 of the NZCPS.	Amend The Earthworks and Ecosystems and Indigenous Biodiversity Chapter rules apply in addition to the earthwork and indigenous vegetation clearance rules in this overlay chapter, not instead of. In the event of a conflict between the earthworks and ecosystems and indigenous biodiversity chapters earthworks indigenous vegetation rules , the most stringent rule will apply.
Royal Forest and Bird Protection Society of New Zealand (S511)	S511.097	Coastal environment	Notes	Support in part	For some reason Note 3 only refers to the Earthworks chapter. When Rule CE-R3 applies to both Earthworks and indigenous vegetation clearance. This note should also relate to the Ecosystems and Indigenous Biodiversity Chapter There may be further significant indigenous biodiversity beyond the areas identified as SNA in the overlays where preservation and protection is required in accordance with Policy 11 of the NZCPS	Amend The Earthworks and Ecosystems and Indigenous Biodiversity Chapter rules apply in addition to the earthwork and indigenous vegetation clearance rules in this overlay chapter, not instead of. In the event of a conflict between the

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						earthworks and ecosystems and indigenous biodiversity chapters earthworks indigenous vegetation rules, the most stringent rule will apply.
David King (S46)	S46.001	Coastal environment	CE-R1	Oppose	The submitter considers that CE-R1/Per-2, as it applies to new buildings or structures not within an urban zone, is too prohibitive. The submitter considers that it should be a person's right to build a residential unit along with any required ancillary structure on land to which they have guaranteed title to and that the Local Authority (FNDC) sees fit to levy payable rates on that land. And, that any required earthworks to achieve that activity should also be included as being permitted.	Amend CE-R1/Per-2 to include residential units not within an urban zone and to also permit earthworks related to that activity.
Horticulture New Zealand (S159)	S159.073	Coastal environment	CE-R1	Oppose	There needs to be provision for buildings for rural production activities in the Coastal environment given that farming is a permitted activity.	Amend subsection 2 of PER-2 of Rule CE-R1as follows: No greater than 25m² 100m² except for artificial crop protection structure.
Horticulture New Zealand (S159)	S159.074	Coastal environment	CE-R1	Oppose	There needs to be provision for buildings for rural production activities in the Coastal environment given that farming is a permitted activity	Amend Rule CE-R1 to insert following: PER-5Artificial crop protection structures located outside outstanding natural character areas where: <ul style="list-style-type: none"> • Dark green or black cloth shall be used on all vertical faces • Green or black cloth shall be used

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						<p>horizontally where the slope is over 10°</p> <ul style="list-style-type: none"> • The structures shall be set back at least 50m from MHWS • No site coverage shall apply • The structures shall be setback 5m from the road boundary unless screened with natural shelter <p>Activity status where compliance is not achieved with PER-5 - Discretionary</p>
<p>Bentzen Farm Limited (S167)</p>	<p>S167.074</p>	<p>Coastal environment</p>	<p>CE-R1</p>	<p>Oppose</p>	<p>The rule as proposed fails to recognise the existence of residential units in the coastal environment and the benefits that subdivision, use and development associated with residential units can bring in the coastal environment. Provision should be made for buildings not ancillary farming activities (including residential units). As drafted, the rule ignores that there are titles, including titles with approved building platforms, which have occurred through a subdivision process which has confirmed the suitability of a residential unit, but are as yet unbuilt on. That should be recognised as a matter of discretion, or in the preferred alternative, added as a controlled activity as also sought by this submission. Except for more than one dwelling per lot, notification should not be a consideration, as the restricted discretionary matters are limited in</p>	<p>Amend rule CE-R1 as follows: Activity status: Permitted Where: PER-1 If a new building or structure is located in an urban zone it is: 1. no greater than 300m². 2. located outside high or outstanding natural character areas. PER-2 If a new building or structure is not located within an urban zone it is: 1. ancillary to farming activities (excluding a residential unit). 2. If not ancillary farming activities (including a residential unit) no greater than 25m² 50m². 3. located outside outstanding natural character areas.</p>

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					<p>their scope and need not involve third party input.</p>	<p>PER-3 Any extension to a lawfully established building or structure is no greater than 20% of the GFA of the existing lawfully established building or structure.</p> <p>PER-4 The building or structure, or extension or addition to an existing building or structure, complies with standards: CE-S1 Maximum height. CE-S2 Colours and materials. Amend the activity status for non compliance with PER-1, PER-2 and PER-3 from discretionary and non-complying to restricted discretionary activity in each case.</p> <p>Insert the following restricted discretionary activity assessment matter:The effects on the characteristics, values and qualities of the coastal environment, including (but not limited to) consideration of the following matters where relevant to the application:a. the presence or absence of buildings, structures or infrastructure;b. the temporary</p>

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

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						<p>environment is required to enable reasonable residential or farming use.o. Whether the location is on a previously approved building platform. Insert the following clause:New buildings or structures, and extensions or alterations to existing buildings or structures which do not comply with PER1, PER2, PER3 or PER4 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</p>
<p>Setar Thirty Six Limited (S168)</p>	<p>S168.073</p>	<p>Coastal environment</p>	<p>CE-R1</p>	<p>Oppose</p>	<p>Rule CE-R1 fails to recognise the existence of residential units in the coastal environment and the benefits that subdivision, use and development associated with residential units can bring in the coastal environment. Provision should be made for buildings not ancillary farming activities (including residential units). 50m², rather than 25m², better provides for small sheds that are typical in rural environments. Non-conformity with the rule is more effectively and efficiently dealt with as a restricted discretionary activity. This is because the matters of discretion are capable of being confined to effects on the identified characteristics and values of the coastal environment. As drafted, the rule ignores that there are titles, including titles with approved building platforms,</p>	<p>Amend rule CE-R1 as follows: Activity status: Permitted Where: PER-1 ... PER-2 If a new building or structure is not located within an urban zone it is: 1. ancillary to farming activities (excluding a residential unit). 2. If not ancillary farming activities (including a residential unit) no greater than 25m² 50m². 3. located outside outstanding natural character areas.</p>

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					<p>which have occurred through a subdivision process which has confirmed the suitability of a residential unit, but are as yet unbuilt on. That should be recognised as a matter of discretion, or in the preferred alternative, added as a controlled activity as also sought by this submission.</p> <p>Except for more than one dwelling per lot, notification should not be a consideration, as the restricted discretionary matters are limited in their scope and need not involve third party input.</p>	<p>PER-3 ... PER-4 ... Amend the activity status for non-compliance with PER-1, PER-2 and PER-3 from discretionary and non-complying to restricted discretionary activity in each case. Insert the following restricted discretionary activity assessment matter:The effects on the characteristics, values and qualities of the coastal environment, including (but not limited to) consideration of the following matters where relevant to the application:a. the presence or absence of buildings, structures or infrastructure;b. the temporary or permanent nature of any adverse effects;c. the location, scale and design of any proposed development;d. any means of integrating the building, structure or activity;e. the ability of the environment to absorb change;f. the need for and location of earthworks or vegetation clearance;g. the</p>

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						<p>operational or functional need of any regionally significant infrastructure to be sited in the particular location;h. Except as provided for under n and o below, any viable alternative locations for the activity or development;i. any historical, spiritual or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6;j. the likelihood of the activity exacerbating natural hazards;k. the opportunity to enhance public access and recreation;l. the ability to improve the overall quality of coastal waters; and m. any positive contribution the development has on the characteristics and qualities.n. Whether locating the activity within the coastal environment is required to enable reasonable residential or farming use.o. Whether the location is on a previously approved building platform. Insert the following clause:New buildings or structures, and extensions or alterations to existing buildings or structures which do not comply with</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						PER1, PER2, PER3 or PER4 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).
Suzanne Linda Ashmore (S169)	S169.002	Coastal environment	CE-R1	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Rule CE-R1 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment	Amend Rule CE-R1 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF
Cavalli Properties Limited (S177)	S177.002	Coastal environment	CE-R1	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Rule CE-R1 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment	Amend Rule CE-R1 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF
The Shooting Box Limited (S187)	S187.064	Coastal environment	CE-R1	Oppose	Refer to submission for detailed reasons for decision(s) requested relating, but not limited to, the following: rule fails to recognise the existence of residential units in the coastal environment and their benefits; provision should be made for buildings not ancillary farming activities (including residential units); 50m2, rather than m2, better provides for small farm sheds that are typical in rural environments; non-conformity is better dealt as a restricted discretionary activity; the rule ignores that there	Amend Rule CE-R1 as follows: Activity status: Permitted Where: PER-1 If a new building or structure is located in an urban zone it is: 1. no greater than 300m2. 2. located outside high or outstanding natural character areas. PER-2

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					<p>are titles, including titles with approved building platforms; and except for more than one dwelling per lot, notification should not be a consideration.</p>	<p>If a new building or structure is not located within an urban zone it is:</p> <ol style="list-style-type: none"> 1. ancillary to farming activities (excluding a residential unit). 2. If not ancillary farming activities (including a residential unit) no greater than 25m² 50m². 3. located outside outstanding natural character areas. <p>PER-3 Any extension to a lawfully established building or structure is no greater than 20% of the GFA of the existing lawfully established building or structure.</p> <p>PER-4 The building or structure, or extension or addition to an existing building or structure, complies with standards: CE-S1 Maximum height. CE-S2 Colours and materials. Amend the activity status for non compliance with PER-1, PER-2 and PER-3 from discretionary and non-complying to restricted discretionary activity in each case. Add the following restricted discretionary activity assessment matter:The effects on the characteristics, values</p>

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						<p>and qualities of the coastal environment, including (but not limited to) consideration of the following matters where relevant to the application:</p> <ul style="list-style-type: none"> a. the presence or absence of buildings, structures or infrastructure; b. the temporary or permanent nature of any adverse effects; c. the location, scale and design of any proposed development; d. any means of integrating the building, structure or activity; e. the ability of the environment to absorb change; f. the need for and location of earthworks or vegetation clearance; g. the operational or functional need of any regionally significant infrastructure to be sited in the particular location; h. Except as provided for under n and o below, any viable alternative locations for the activity or development; i. any historical, spiritual or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6; j. the likelihood of the activity exacerbating natural hazards; k. the opportunity to enhance public

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						<p>access and recreation;l. the ability to improve the overall quality of coastal waters; andm. any positive contribution the development has on the characteristics and qualities.n. Whether locating the activity within the coastal environment is required to enable reasonable residential or farming use.o. Whether the location is on a previously approved building platform.Add the following clause:New buildings or structures, and extensions or alterations to existing buildings or structures which do not comply with PER1, PER2, PER3 or PER4 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</p>
<p>New Zealand Defence Force (S217)</p>	<p>S217.025</p>	<p>Coastal environment</p>	<p>CE-R1</p>	<p>Support in part</p>	<p>TMTA may require the placement of temporary buildings and structures in the coastal environment to enable training exercises such as beach landings. Due to their temporary nature it is appropriate that any buildings or</p>	<p>Amend Rule CE-R1 as follows: PER-2 If a new building or structure is not located within an urban zone it is: 1. ancillary to farming activities (excluding a residential unit) or</p>

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					structures ancillary to temporary military training activities are permitted.	<p>temporary military training activities.</p> <p>2. no greater than 25m2.</p> <p>3. located outside outstanding natural character areas.</p> <p>PER-4 Except where it is ancillary to a temporary military training activity, the building or structure, or extension or addition to an existing building or structure, complies with standards:</p> <p>CE-S1 Maximum height.</p> <p>CE-S2 Colours and materials.</p>
Wendover Two Limited (S222)	S222.066	Coastal environment	CE-R1	Oppose	<p>The rule as proposed fails to recognise the existence of residential units in the coastal environment and the benefits that subdivision, use and development associated with residential units can bring in the coastal environment. Provision should be made for buildings not ancillary farming activities (including residential units). 50m2, rather than 25m2, better provides for small farm sheds that are typical in rural environments. Non-conformity with the rule is more effectively and efficiently dealt with as a restricted discretionary activity. This is because the matters of discretion are capable of being confined to effects on the identified characteristics and values of the coastal environment. As drafted, the rule ignores that there are titles, including titles with approved building platforms, which have occurred through a subdivision process which has confirmed the suitability of a residential unit, but are as yet unbuilt on. That should be recognised as a matter of discretion, or in the preferred alternative, added as a</p>	<p>Amend rule CE-R1 as follows:</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p>If a new building or structure is located in an urban zone it is:</p> <p>1. no greater than 300m2.</p> <p>2. located outside high or outstanding natural character areas.</p> <p>PER-2</p> <p>If a new building or structure is not located within an urban zone it is:</p> <p>1. ancillary to farming activities (excluding a residential unit).</p> <p>2. If not ancillary farming activities (including a residential unit) no greater than 25m2 50m2.</p> <p>3. located outside outstanding natural character areas.</p> <p>PER-3</p>

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					<p>controlled activity as also sought by this submission. Except for more than one dwelling per lot, notification should not be a consideration, as the restricted discretionary matters are limited in their scope and need not involve third party input.</p>	<p>Any extension to a lawfully established building or structure is no greater than 20% of the GFA of the existing lawfully established building or structure.</p> <p>PER-4</p> <p>The building or structure, or extension or addition to an existing building or structure, complies with standards:</p> <p>CE-S1 Maximum height.</p> <p>CE-S2 Colours and materials.</p> <p>Amend the activity status for non compliance with PER-1, PER-2 and PER-3 from discretionary and non-complying to restricted discretionary activity in each case.</p> <p>Insert the following restricted discretionary activity assessment matter:The effects on the characteristics, values and qualities of the coastal environment, including (but not limited to) consideration of the following matters where relevant to the application:</p> <p>a. the presence or absence of buildings, structures or infrastructure;</p> <p>b. the temporary or permanent nature of any</p>

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

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>enable reasonable residential or farming use.o. Whether the location is on a previously approved building platform. Insert the following clause:New buildings or structures, and extensions or alterations to existing buildings or structures which do not comply with PER1, PER2, PER3 or PER4 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</p>
<p>Matauri Trustee Limited (S243)</p>	<p>S243.092</p>	<p>Coastal environment</p>	<p>CE-R1</p>	<p>Oppose</p>	<p>The rule as proposed fails to recognise the existence of residential units in the coastal environment and the benefits that subdivision, use and development associated with residential units can bring in the coastal environment. Provision should be made for buildings not ancillary farming activities (including residential units). 50m², rather than 25m², better provides for small farm sheds that are typical in rural environments. Non-conformity with the rule is more effectively and efficiently dealt with as a restricted discretionary activity. This is because the matters of discretion are capable of being confined to effects on the identified characteristics and values of the coastal environment. As drafted, the rule ignores that there are titles, including titles with approved building platforms,</p>	<p>Amend rule CE-R1 as follows: Activity status: Permitted Where: PER-1 If a new building or structure is located in an urban zone it is: 1. no greater than 300m². 2. located outside high or outstanding natural character areas. PER-2 If a new building or structure is not located within an urban zone it is: 1. ancillary to farming activities (excluding a residential unit). 2. If not ancillary farming activities (including a residential unit) no greater than 25m² 50m².</p>

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					<p>which have occurred through a subdivision process which has confirmed the suitability of a residential unit, but are as yet unbuilt on. That should be recognised as a matter of discretion, or in the preferred alternative, added as a controlled activity as also sought by this submission. Except for more than one dwelling per lot, notification should not be a consideration, as the restricted discretionary matters are limited in their scope and need not involve third party input.</p>	<p>3. located outside outstanding natural character areas. PER-3 Any extension to a lawfully established building or structure is no greater than 20% of the GFA of the existing lawfully established building or structure. PER-4 The building or structure, or extension or addition to an existing building or structure, complies with standards: CE-S1 Maximum height. CE-S2 Colours and materials. Amend the activity status for non-compliance with PER-1, PER-2 and PER-3 from discretionary and non-complying to restricted discretionary activity in each case. Add the following restricted discretionary activity assessment matter:The effects on the characteristics, values and qualities of the coastal environment, including (but not limited to) consideration of the following matters where relevant to the application:a. the presence or absence of</p>

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						<p>buildings, structures or infrastructure;b. the temporary or permanent nature of any adverse effects;c. the location, scale and design of any proposed development;d. any means of integrating the building, structure or activity;e. the ability of the environment to absorb change; need for and location of earthworks or vegetation clearance;g. the operational or functional need of any regionally significant infrastructure to be sited in the particular location;h. Except as provided for under n and o below, any viable alternative locations for the activity or development;i. any historical, spiritual or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6;j. the likelihood of the activity exacerbating natural hazards;k. the opportunity to enhance public access and recreation;l. the ability to improve the overall quality of coastal waters; andm. any positive contribution the development has on the characteristics and</p>

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						<p>qualities.n. Whether locating the activity within the coastal environment is required to enable reasonable residential or farming use.o. Whether the location is on a previously approved building platform. Add the following clause:New buildings or structures, and extensions or alterations to existing buildings or structures which do not comply with PER1, PER2, PER3 or PER4 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</p>
Richard G A Palmer (S248)	S248.003	Coastal environment	CE-R1	Support in part	I simply cannot see the logic where my neighbour on a 1000m2 site can build a 200m2 house right but no a 25000m2 site i need a RC for a 110m2 house	amend CE-R1 size limit to 150m2 - being a modest house
Willowridge Developments Limited (S250)	S250.017	Coastal environment	CE-R1	Support in part	<p>The CE does not provide sufficient nuance or recognise the varied environments of the underlying zones. This is considered relevant in both the urban and non-urban environments described in the rule, particularly as it relates to the enablement of built form that cannot meet the permitted activity thresholds described in PER-1 and PER-2 of the CE-R1.</p> <p>The construction of any residential unit within their site of interest would require discretionary</p>	<p>Amend CE-R1-PER-1 to remove clause (1) that relates to building footprint. Amend CE-R1-PER-2 to remove clause (1). Review the building footprint controls proposed in clause (2) and provide for appropriate building footprints that reflect the varied values of each zone environment. Amend to incorporate a restricted</p>

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					<p>activity resource consent, despite the site having sufficient RLZ land that has to establish as up to 21 residential units as a permitted activity in accordance with the underlying zone provisions.</p> <p>This approach is overly restrictive, when considering the nature of the effects generated. The section 32 evaluation report and supporting Landscape Report provided as Appendix 1 do not provide sufficient analysis to support this approach.</p>	<p>discretionary activity to CE-R1 with targeted matters of discretion to provide for activities that cannot comply with the permitted standards where the proposal is outside of HNC and ONC areas.</p>
<p>New Zealand Maritime Parks Ltd (S251)</p>	<p>S251.007</p>	<p>Coastal environment</p>	<p>CE-R1</p>	<p>Support in part</p>	<p>NZMPL generally support FNDCs efforts to protect the natural character of the coastal environment from inappropriate land use, subdivision and development in accordance with section 6 of the RMA, NZCPS and RPS. However, it has concerns with the bulk and scale approach taken in the PDP, particularly in relation to building height and size in urban areas. In NZMPL's view, FNDC through its Section 32 report has not adequately assessed the proposed thresholds. When considering the scale and height of existing buildings in urban areas and in the context of each zones anticipated outcomes, the notified thresholds are considered to be in conflict and do not align with the variable values of these established environments. In NZMPL's view, the urban environment thresholds for building size should be removed and managed by the underlying zone. The coverage rules already set controls to manage the bulk and scale of built form that are aligned with the character of each zone framework.</p> <p>While it is acknowledged that the Section 32 Report mentions building size and height to manage effects in the coastal environment, it is considered that this has not sufficiently evaluated each zone environment or taken into account the existing built form values. Finally, NZMPL are concerned with the default discretionary activity status approach taken for</p>	<p>Amend PER-1 of Rule CE-R1 to remove clause(1) that relates to building footprint OR alternatively, review the thresholds for building size to align with the thresholds set by the coverage standards of the underlying zone.</p> <p>Insert a restricted discretionary activity to Rule CE-R1 with targeted matters of discretion to provide for activities that cannot comply with the permitted standards where the proposal is outside of HNC and ONC areas.</p>

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					buildings within the CE (but are outside of high or outstanding natural character areas). It is considered that when compliance is not achieved with the relevant permitted standards, that effects can be more efficiently and effectively managed through a restricted discretionary activity that has targeted matters of discretion.	
Nicole Wooster (S259)	S259.012	Coastal environment	CE-R1	Support in part	A family cemetery is located in the coastal environment. It is unclear if headstones etc would be captured by rule CE-R1 as they would be considered to be structures fixed to the land as is any concrete area associated with the grave. Unsure if this would however be covered by existing use rights and therefore not need to be covered by a rule.	Amend rules to provide for the continued operation of existing cemeteries in a coastal environment or have Council confirm that this is covered by existing use rights.
Waitoto Development Limited (S263)	S263.032	Coastal environment	CE-R1	Oppose	The submitter considers that rule CE-R1 should not apply to the Orongo Bay Special Purpose Zone which should be exempt from this rule as its imposition negates the overall purpose of the special zone.	Delete rule CE-R1 as it applies to the Orongo Bay Special Purpose Zone.
Trent Simpkin (S283)	S283.003	Coastal environment	CE-R1	Oppose	The maximum size of 300m2 is too restrictive within the urban zones. There is a large quantity of homes being designed and built that are over 300m2 and to make it mandatory to get a resource consent is just slowing the project down, especially when a home might be 305m2. In terms of a house - whether it's 200m2 or 500m2 it is actually providing a very similar visual impact because often larger homes hide the space.	Delete the 300m2 maximum floor area requirement.
Tristan Simpkin (S287)	S287.001	Coastal environment	CE-R1	Oppose	The maximum size of 300m2 is too restrictive. There is a large quantity of homes being designed and built that are over 300m2 and to make it mandatory to get a resource consent is just slowing the project down, especially when a home might be 305m2. In terms of a house - whether it's 200m2 or 500m2 it is actually providing a very similar visual impact because often larger homes hide the space.	Delete the 300m2 maximum floor area.
Far North Holdings	S320.009	Coastal environment	CE-R1	Not Stated	The submitter considers that amendments to rule CE-R1 New buildings or structures, and	Amend CE-R1 to read as follows: PER-1

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Limited (S320)					extensions or alterations to existing buildings or structures, are appropriate for all of the Far North Holdings Ltd (FNHL) landholdings, as it better reflects existing, consented and proposed land uses (s32 assessment provided with submission).	If a new building or structure is located in an urban zone it is: 1. no greater than 300m2, except within the OMDA, and the Mixed Use Zone at the Opuia Marina, Marine Business Park, Commercial Estate, and Colenzo Triangle that is no greater than 800m2...
P S Yates Family Trust (S333)	S333.065	Coastal environment	CE-R1	Oppose	<p>The rule as proposed fails to recognise the existence of residential units in the coastal environment and the benefits that subdivision, use and development associated with residential units can bring in the coastal environment. Provision should be made for buildings not ancillary farming activities (including residential units). 50m2, rather than 25m2, better provides for small farm sheds that are typical in rural environments.</p> <p>Non-conformity with the rule is more effectively and efficiently dealt with as a restricted discretionary activity. This is because the matters of discretion are capable of being confined to effects on the identified characteristics and values of the coastal environment.</p> <p>As drafted, the rule ignores that there are titles, including titles with approved building platforms, which have occurred through a subdivision process which has confirmed the suitability of a residential unit, but are as yet unbuilt on. That should be recognised as a matter of discretion, or in the preferred alternative, added as a controlled activity as also sought by this submission.</p> <p>Except for more than one dwelling per lot, notification should not be a consideration, as the restricted discretionary matters are limited in</p>	<p>Amend rule CE-R1 as follows:<i>Activity status:</i> <i>Permitted Where: PER-1</i> If a new building or structure is located in an urban zone it is: 1. no greater than 300m2. 2. located outside high or outstanding natural character areas. <i>PER-2</i> If a new building or structure is not located within an urban zone it is: 1. ancillary to farming activities (excluding a residential unit). 2. If not ancillary farming activities (including a residential unit) no greater than 25m2 50m2. 3. located outside outstanding natural character areas. <i>PER-3</i> Any extension to a lawfully established building or structure is no greater than 20% of the GFA of the existing lawfully established building or</p>

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					<p>their scope and need not involve third party input. .</p>	<p><i>structure. PER-4 The building or structure, or extension or addition to an existing building or structure, complies with standards: CE-S1 Maximum height. CE-S2 Colours and materials.</i> Amend the activity status for noncompliance with PER-1, PER-2 and PER-3 from discretionary and non-complying to restricted discretionary activity in each case. Add the following restricted discretionary activity assessment matter: <i>The effects on the characteristics, values and qualities of the coastal environment, including (but not limited to) consideration of the following matters where relevant to the application: a. the presence or absence of buildings, structures or infrastructure; b. the temporary or permanent nature of any adverse effects; c. the location, scale and design of any proposed development; d. any means of integrating the building, structure or activity; e. the ability of the environment to absorb change; f. the need for and location of earthworks or</i></p>

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						<p><i>vegetation clearance; g. the operational or functional need of any regionally significant infrastructure to be sited in the particular location; h. Except as provided for under n and o below, any viable alternative locations for the activity or development; i. any historical, spiritual or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6; j. the likelihood of the activity exacerbating natural hazards; k. the opportunity to enhance public access and recreation; l. the ability to improve the overall quality of coastal waters; and m. any positive contribution the development has on the characteristics and qualities. n. Whether locating the activity within the coastal environment is required to enable reasonable residential or farming use. o. Whether the location is on a previously approved building platform.</i></p> <p>Add the following clause: <i>New buildings or structures, and extensions or alterations to</i></p>

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						<i>existing buildings or structures which do not comply with PER1, PER2, PER3 or PER4 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</i>
Ed and Inge Amsler (S341)	S341.011	Coastal environment	CE-R1	Oppose	There should be alignment between the rules where the site is urban in nature.	Amend to align with the Mixed Use Zone of 400m ² for buildings in CE-R1.
Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd (S344)	S344.013	Coastal environment	CE-R1	Not Stated	It is considered that this rule places unnecessarily restrictive rules upon urban areas such as Paihia within the CE where amenity and character has already been compromised.	Amend CE-R1 to exclude land zoned MUZ, RSZ and LIZ or any equivalent commercial zone, to enable development to occur in accordance with the underlying zone provisions.
Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd (S344)	S344.016	Coastal environment	CE-R1	Not Stated	It is extremely onerous to limit all buildings within an existing coastal township to be managed by strict standards and that the discretionary activity status applying to the construction of new buildings (over 300m ²) within the CE but outside any ONCA can be appropriately managed through a restricted discretionary activity status, with targeted matters of discretion, as opposed to a blanket discretionary status.	Amend to provide a permitted activity tier for new buildings within an existing commercial area of a coastal township and a restricted discretionary status for proposals that do not comply (outside any ONCA). Review the relationship between MUZ and CE activity-based rules, either refined to improve clarity, or additional rules are included to ensure certain activities are clearly permitted in both areas.

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Foodstuffs North Island Limited (S363)	S363.014	Coastal environment	CE-R1	Not Stated	The submitter considers that rule CE-R1 New buildings or structures, and extensions or alterations to existing buildings or structures, places unnecessarily restrictive rules upon urban areas such as Paihia within the CE where amenity and character has already been compromised.	Amend rule CE-R1 New buildings or structures, and extensions or alterations to existing buildings or structures, to exclude land zoned MUZ, RSZ and LIZ or any equivalent commercial zone, to enable development to occur in accordance with the underlying zone provisions.
Far North District Council (S368)	S368.037	Coastal environment	CE-R1	Support in part	Spelling error in PER-2. Replace 'then' with 'than'	Amend CE-R1 PER-2 If a new building or structure is not located within an urban zone it is: 1. ancillary to farming activities (excluding a residential unit). 2. no greater than than 25m ² 3. located outside outstanding natural character areas.
Sarah Ballantyne and Dean Agnew (S386)	S386.013	Coastal environment	CE-R1	Support in part	Ballantyne & Agnew consider that the 5m height limits imposed by CE-S1 Maximum Height to all new buildings and structures within urban zones is overly restrictive. In Ballantyne & Agnew's view these areas are locations where development is already concentrated, provided for by the PDP and are supported by infrastructure. In Ballantyne & Agnew's view, the built form (like farming) does form part of the values present in these areas. The PDP encourages and seeks to consolidate development into these areas, however the limitations on building footprints and height are considered to hinder development capacity in these locations should these design controls remain in place. With respect to new buildings outside of urban zones, while it is recognised that farming forms part of the established values of natural	- Amend CE-R1-PER-1 to delete clause (1) that relates to building footprint. - Amend CE-R1-PER-2 to delete clause (1). - Review the building footprint controls proposed in clause (2) and provide for appropriate building footprints that reflect the varied values of each zone environment. - Incorporate a restricted discretionary activity to CE-R1 with targeted matters of discretion to provide for activities that cannot comply with the permitted standards and are outside of HNC and ONC areas.

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					character of the CE, Ballantyne & Agnew consider it unnecessary to limit new buildings/structures in this way, given the introduction of any new built form will be the same or similar irrespective if the building is ancillary to farming or not. Further, it is considered that CE-R1 as proposed, does not adequately provide for the variable environments that exist within the District or appropriately respond to the underlying zone framework. Finally, the default activity status of 'Discretionary Activity' resource consenting pathway for activities outside of mapped ONC and HNC areas is considered overly onerous. Targeted matters of discretion would be more appropriate to manage effects.	
Peter Malcolm (S414)	S414.001	Coastal environment	CE-R1	Support in part	A large proportion of the land in the proposed Rural Lifestyle Zone in Inlet Road is designated as Coastal (Map 84). In proposed coastal environment (CE-R1) new buildings. New buildings less than 300m ² are permitted in an urban zone but not in other zones, in particular rural lifestyle.	Amend CE-R1(PER-1) to: "If new building is located in an urban zone or Rural Lifestyle Zone it is: 1. no greater than 300m ² 2. located outside high or outstanding natural character areas."
Northland Federated Farmers of New Zealand (S421)	S421.186	Coastal environment	CE-R1	Support in part	Federated Farmers does not support the use of the high natural character layer and seeks its removal in its entirety. Federated Farmers supports new buildings ancillary to farming activities being permitted under rule CE-R1. We seek that the 25m ² size for these buildings be increased to a reasonable size. The proposed size is too restrictive and is not fit for purpose as ancillary farm buildings are typically greater in size as they need to be able to accommodate farm machinery, hay bales etc.	Amend Rule CE-R1 as follows: <ul style="list-style-type: none"> Remove all references to the use and application of high character areas/layers Amend PER-2 to increase the size from 25m² to 250m² Amend PER-2 to delete the requirement for a new building ancillary to

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					The requirement for the new buildings to be located outside of outstanding natural character areas is not support as it does not recognise the functional need for farm buildings to be located where they are needed and where they are of the most use.	farming activities to be located outside of outstanding natural character area
John Andrew Riddell (S431)	S431.039	Coastal environment	CE-R1	Not Stated	The proposed Plan is set out in the atomistic way required by the National Planning Standards. As a consequence, in addition to the amendments sought to the Kororāreka Russell Township Zone provisions, there are amendments needed to other chapters of the proposed Plan, including the Coastal Environment Overlay, Historic Heritage and Subdivision provisions for the reasons set out with respect to the provisions in the Kororāreka Russell Township zone.	Amend PER-4 of Rule CE-R1 so that it does not apply to new buildings or structures in an urban zone or extensions to a lawfully established building or structure.
Kingheim Limited (S461)	S461.002	Coastal environment	CE-R1	Support in part	The floor area restrictions for new buildings in the CE should be removed. The CE Chapter includes standards requiring colours and materials to be sympathetic to the surrounding environment (CE-S1). Provided these rules are complied with, any effects of such buildings will be mitigated. There is no need to still require consent for buildings simply because they exceed a certain size.	<p>amend CE-R1</p> <p>PER-1 If a new building or structure is located in an urban zone it is:1. no greater than 300m².</p> <p>2. located outside high or outstanding natural character areas.</p> <p>PER-2 If a new building or structure is not located within an urban zone it is:1. ancillary to farming activities (excluding a residential unit).2. no greater than 25m².</p> <p>3. located outside outstanding natural character areas</p>

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Waiaua Bay Farm Limited (S463)	S463.060	Coastal environment	CE-R1	Oppose	<p>The upshot of this rule for WBF is that in the coastal environment, a discretionary activity status applies to all development > 25 m². Even if smaller than 25 m², development is a discretionary activity if it is not ancillary to farming.</p> <p>At Kauri Cliffs the land in both the coastal environment and the RPROZ, is mainly cliffs or areas of regenerating vegetation. Farming is not carried out in these areas.</p> <p>The remaining areas of Kauri Cliffs that are in the coastal environment are in the Golf Living, Golf Playing or Lodge subzones, and accommodate limited farming activity, which will decrease further as the next stage of development is implemented.</p> <p>Therefore, the 25 m² and ancillary to farming performance standards are practically impossible for WBF to comply with. These standards are entirely misplaced in the context of Kauri Cliffs, given the activities that exist, or can reasonably be anticipated, in the Golf Living, Golf Playing or Lodge subzones.</p>	<p>Amend PER-2 of Rule CE-R1 to include new point 4. as follows:4. Located in a Special Purpose Zone, where the zone provisions prevail and this rule does not apply.</p> <p>Amend the reference to CE-S1 in PER-4 of Rule CE-R1 as follows:CE-S1 Maximum height, except in a Special Purpose Zone, where the zone provisions prevail and this rule does not apply.</p>
Top Energy Limited (S483)	S483.172	Coastal environment	CE-R1	Oppose	<p>No provision has been made to allow for new network utilities of an appropriate scale within these environments.</p> <p>CE-R1 provides limited ability for new structures within the Coastal Environment.</p> <p>Of concern to Top Energy are the rules that apply to sites not located within an Urban zone; outside that zone, new buildings are limited to 25m² and only permitted where they are associated with structures that are ancillary to farming activities. No provision has been made to allow for new network utilities of an appropriate scale within this environment.</p> <p>Top Energy generally supports a preference to underground new customer connections in the Coastal Environment where possible, but this needs to be enabled and may require additional small scale network utility buildings and structures (e.g., transformers and pillars) above</p>	<p>Amend Point 1 of PER-2 of Rule CE-R1 as follows: 1.ancillary to farming activities (excluding a residential unit) or a network utility.</p>

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					<p>ground to facilitate this which would otherwise comply with the 25m² and 5m height limit afforded to buildings and structures ancillary to farming.</p> <p>On review of the s32 analysis for the Coastal Environment chapter, it is understood that structures associated with primary production are enabled; this analysis does not expressly identify why.</p> <p>However, it is assumed it is because farming activities are a common fixture within this environment and that farming is a dominant primary sector industry within the District as is highlighted in the s32 Overview).</p> <p>Given that connection to electricity infrastructure is critical to such operations, Top Energy seeks that the same permitted activity threshold applies to network utilities.</p>	
Owen Burn (S490)	S490.005	Coastal environment	CE-R1	Oppose	<p>The standards proposed for activities within the overlays applying to the site at Orokawa Bay would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act.</p> <p>Further, the submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include imitations on the height, colour and reflectivity of buildings</p>	Delete the provisions of Rule CE-R1 relating to area, height and exterior finishes of new buildings in the Coastal Environment
Eric Kloet (S491)	S491.005	Coastal environment	CE-R1	Oppose	<p>The standards proposed for activities within the overlays applying to the site at Waipohutukawa Bay (Lots 5 and 18 of DP 391213) would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act.</p> <p>Further, the submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include imitations on the height, colour and reflectivity of buildings.</p>	Delete the provisions of Rule CE-R1 relating to area, height and exterior finishes of new buildings in the Coastal Environment

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Ironwood Trust Limited (S492)	S492.005	Coastal environment	CE-R1	Oppose	The standards proposed for activities within the overlays applying to the site at Jack's Bay and Waipiro Bay would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act. Further, the submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include the identification of farming and forestry as discretionary activities, setbacks from MHWS and imitations on the height and colour of buildings.	Delete the provisions of Rule CE-R1 relating to area, height and exterior finishes of new buildings in the Coastal Environment
William Goodfellow (S493)	S493.008	Coastal environment	CE-R1	Oppose	The submitter also considers that the activity status and standards imposed on activities within the coastal environment are unnecessarily onerous. These include imitations on setback for buildings from MHWS, and limitations over the area, height, colour and reflectivity of buildings.	Amend provisions within the plan that impose limitations on the area of new buildings located within the coastal environment overlay be deleted.
Ian Jepson (S494)	S494.008	Coastal environment	CE-R1	Oppose	Further, the submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include the identification of farming and forestry as discretionary activities, and imitations on the height, colour and reflectivity of buildings.	Amend provisions within the plan that impose limitations on the area of new buildings located within the coastal environment overlay be deleted.
Ricky Faesen Kloet (S495)	S495.009	Coastal environment	CE-R1	Oppose	The submitter considers that the proposed standards that apply to activities located within the coastal environment overlay would limit the reasonable development of land to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act.	Amend CE-R1 to remove provisions restricting the area of new buildings (inferred).
Philip Thornton (S496)	S496.006	Coastal environment	CE-R1	Oppose	The submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include imitations on the height, colour and reflectivity of buildings.	Amend provisions within the plan that impose limitations on the area of new buildings located within the coastal environment overlay be deleted.
Mark John Wyborn (S497)	S497.006	Coastal environment	CE-R1	Support in part	The imposition of controls intended to manage development make the reasonable use and development of the property unfairly and unnecessarily constrained (inferred).	Amend provisions within the plan that impose limitations on the area of new buildings located within the coastal environment overlay be

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						deleted.
<p>Northland Planning and Development 2020 Limited (S502)</p>	<p>S502.016</p>	<p>Coastal environment</p>	<p>CE-R1</p>	<p>Support in part</p>	<p>PER-2 relates to all rural zones, including Rural Production, Rural Lifestyle, Rural Residential and Settlement, as well as the Sport and Active Recreation zone. The Coastal Environment covers the entirety of the Waitangi Estate. It is considered that provision should be made for buildings which are not ancillary to farming, as PER-2 relates to smaller density rural zones, which do not consist of rural productive activities, such as farming.</p> <p>It is considered that provision should be made for buildings no greater than 25m² and not ancillary to farming, such as sheds/garages associated with sport and recreation activities. This generally aligns with the Melean Absolum Limited Landscape Report as buildings which are of such a small size will generally be ancillary to a principal activity such as a sleepout or be of such a small size that the effects are easily mitigated. We note that while the Melean landscape report refers to non-habitable buildings it does not specify if these are ancillary to farming. PER-4 provides additional controls on height and colours and materials, which are to be complied with. With these controls in place, it is considered that buildings no greater than 25m² within sites not zoned urban, will meet the objectives and policies of the coastal environment by ensuring the characteristics and qualities of the natural character of the coastal environment is preserved.</p> <p>Provision has also been made for buildings or structures ancillary to farming activities, no greater than 50m². The reasoning behind this is that farm buildings less than 50m² are generally less functional as there tends not to be sufficient space to park machinery or sufficiently store hay as an example. Offering a 25m² restriction is unlikely to be utilized especially given that a double garage is at a minimum 36m². Once</p>	<p>Amend CE-R1 PER-2 If a new building or structure is not located within an urban zone it is:</p> <ol style="list-style-type: none"> 1. ancillary to farming activities and no greater than 50m² (excluding a residential unit) or 2. a building not ancillary to farming no greater then 25m² and 3. located outside outstanding natural character areas <p>In the event this relief is not accepted, we seek that the above changes apply to the Waitangi Estate only.</p>

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					again, the height, colours and materials of such buildings are controlled by PER-4, such that any building of 50m ² or less could be considered to not adversely affect the natural character of the coastal environment. This is also consistent within Policy CE-P6 which seeks to 'enable farming activities within the coastal environment.	
Waitangi Limited (S503)	S503.014	Coastal environment	CE-R1	Not Stated	<p>PER-2 relates to all rural zones, including Rural Production, Rural Lifestyle, Rural Residential and Settlement, as well as the Sport and Active Recreation zone. The Coastal Environment covers the entirety of the Waitangi Estate. It is considered that provision should be made for buildings which are not ancillary to farming, as PER-2 relates to smaller density rural zones, which do not consist of rural productive activities, such as farming.</p> <p>It is considered that provision should be made for buildings no greater than 25m² and not ancillary to farming, such as sheds/garages associated with sport and recreation activities. This generally aligns with the Melean Absolum Limited Landscape Report as buildings which are of such a small size will generally be ancillary to a principal activity such as a sleepout or be of such a small size that the effects are easily mitigated. We note that while the Melean landscape report refers to non-habitable buildings it does not specify if these are ancillary to farming. PER-4 provides additional controls on height and colours and materials, which are to be complied with. With these controls in place, it is considered that buildings no greater than 25m² within sites not zoned urban, will meet the objectives and policies of the coastal environment by ensuring the characteristics and qualities of the natural character of the coastal environment is preserved.</p> <p>Provision has also been made for buildings or structures ancillary to farming activities, no greater than 50m². The reasoning behind this is that farm buildings less than 50m² are generally</p>	<p>Amend PER-2 of Rule CE-R1 as follows: PER-2 If a new building or structure is not located within an urban zone it is: 1.ancillary to farming activities and no greater than 50m² (excluding a residential unit) or 2.a building not ancillary to farming no greater then 25m² and 3.located outside outstanding natural character areas. In the event this relief is not accepted, we seek that the above changes apply to the Waitangi Estate only.</p>

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					less functional as there tends not to be sufficient space to park machinery or sufficiently store hay as an example. Offering a 25m ² restriction is unlikely to be utilized especially given that a double garage is at a minimum 36m ² . Once again, the height, colours and materials of such buildings are controlled by PER-4, such that any building of 50m ² or less could be considered to not adversely affect the natural character of the coastal environment. This is also consistent within Policy CE-P6 which seeks to 'enable farming activities within the coastal environment.	
Vaughan Norton-Taylor (S536)	S536.007	Coastal environment	CE-R1	Oppose	Limiting floor area of a new building or structure located in an urban zone to 300m ² and any extension to a lawfully established building or structure to 20% of the GFA of the existing lawfully established building or structure has total disregard to development options and desecration of land values. No logic or reason are given for this change.	Delete Rule CE-R1 and retain status quo (inferred)
Omata Estate (S548)	S548.003	Coastal environment	CE-R1	Oppose	The Section 32 Report on the Coastal Environment outlines that the PDP has utilised the Northland Regional Council's Regional Policy Statement mapping of the Coastal Environment and areas of High Natural Character ² . The entirety of the Omata Estate land is identified as being within the Coastal Environment and the areas of the site covered by the established native vegetation are identified as being of High Natural Character. The Coastal Environment Chapter of the PDP stipulates that a Discretionary resource consent is required to establish new buildings or structures established on sites outside of urban zones where they are not ancillary to a farming activity, are no greater than 25m ² and are outside of the Outstanding Natural Landscape (Rule CE-R1, PER-2). This activity status applies regardless of whether the new building is located outside of the High Natural Character	amend CE-R1 to provide for the establishment of new buildings on structures outside of an urban zones (not within a high natural character area or outstanding natural character area as a restricted discretionary activity with associated matters of discretion and assessment criteria

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					<p>areas. In the context of the Omata Estate land, both sites are entirely situated within the Coastal Environment. Therefore, there is no ability to locate buildings or development outside of the Coastal Environment. The PDP should provide for new buildings and structures to be established on rural sites within the Coastal Environment through a Restricted Discretionary resource consent where it can be determined that the adverse effects of development can be appropriately avoided, remedied, or mitigated. This is a better outcome and more appropriate in terms of a s32 cost and benefit analysis. Omata Estate seeks that Rule CE-R1 be amended to provide for the establishment of new buildings or structures to be located outside of urban zones as a Restricted Discretionary activity where they meet the CE-S1 Maximum Height and CE-S2 Colours and Materials standards. Appropriate matters of discretion and assessment criteria would be to ensure that the adverse effects of the development on the Coastal Environment are appropriately avoided, remedied or mitigated.</p>	
Horticulture New Zealand (S159)	S159.075	Coastal environment	CE-R2	Support in part	Provisions should be made for structures ancillary to farming activities	Amend Rule CE-R2 to include: 8. structures ancillary to primary production activities
Bentzen Farm Limited (S167)	S167.076	Coastal environment	CE-R2	Oppose	<p>There is no need for a rule for an activity class of repair and maintenance. Repairs and maintenance should be otherwise permitted under the respective rules relating to the buildings, earthworks and indigenous vegetation clearance activity classes within the overlay.</p> <p>Unforeseen consequences will result with the rule as drafted where classes of repairs and maintenance not listed will fall to discretionary activity, triggering costly and unnecessary consent processes.</p>	Delete Rule CE-R2

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Setar Thirty Six Limited (S168)	S168.075	Coastal environment	CE-R2	Oppose	<p>There is no need not be a rule for an activity class of repair and maintenance. Repairs and maintenance should be otherwise be permitted under the respective rules relating to the buildings, earthworks and indigenous vegetation clearance activity classes within the overlay. Those rules (as sought to be amended by this submission) most effectively and efficiently manage the effects of relevant activities on the resources managed by the overlay.</p> <p>Unforeseen consequences will result with the rule as drafted where classes of repairs and maintenance not listed will fall to discretionary activity, triggering costly and unnecessary consent processes.</p>	Delete Rule CE-R2
Suzanne Linda Ashmore (S169)	S169.003	Coastal environment	CE-R2	Oppose	<p>Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone.</p> <p>Rule CE-R2 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment</p>	Amend Rule CE-R2 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF
Cavalli Properties Limited (S177)	S177.003	Coastal environment	CE-R2	Oppose	<p>Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone.</p> <p>Rule CE-R2 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment</p>	Amend Rule CE-R2 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF
The Shooting Box Limited (S187)	S187.066	Coastal environment	CE-R2	Oppose	<p>There is no need not be a rule for an activity class of repair and maintenance.</p> <p>Repairs and maintenance should be otherwise be permitted under the respective rules relating to the buildings, earthworks and indigenous</p>	Delete Rule CE-R2

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					vegetation clearance activity classes within the overlay. Those rules (as sought to be amended by this submission) most effectively and efficiently manage the effects of relevant activities on the resources managed by the overlay.	
Wendover Two Limited (S222)	S222.068	Coastal environment	CE-R2	Oppose	There is no need not be a rule for an activity class of repair and maintenance. Repairs and maintenance should be otherwise be permitted under the respective rules relating to the buildings, earthworks and indigenous vegetation clearance activity classes within the overlay. Those rules (as sought to be amended by this submission) most effectively and efficiently manage the effects of relevant activities on the resources managed by the overlay. Unforeseen consequences will result with the rule as drafted where classes of repairs and maintenance not listed will fall to discretionary activity, triggering costly and unnecessary consent processes. An example is existing houses in the coastal environment, whereby their repair and maintenance (including any normal domestic maintenance) would trigger a full discretionary activity resource consent because they are not specified in the repair or maintenance rule.	Delete Rule CE-R2
Matauri Trustee Limited (S243)	S243.094	Coastal environment	CE-R2	Oppose	There is no need not be a rule for an activity class of repair and maintenance. Repairs and maintenance should be otherwise be permitted under the respective rules relating to the buildings, earthworks and indigenous vegetation clearance activity classes within the overlay. Those rules (as sought to be amended by this submission) most effectively and efficiently manage the effects of relevant activities on the resources managed by the overlay. Unforeseen consequences will result with the rule as drafted where classes of repairs and	Delete Rule CE-R2

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					maintenance not listed will fall to discretionary activity, triggering costly and unnecessary consent processes.	
Waitoto Development Limited (S263)	S263.033	Coastal environment	CE-R2	Oppose	The submitter considers that rule CE-R2 should not apply to the Orongo Bay Special Purpose Zone which should be exempt from this rule.	Delete rule CE-R2 as it applies to the Orongo Bay Special Purpose Zone.
Trent Simpkin (S283)	S283.004	Coastal environment	CE-R2	Oppose	This rule can be read two ways. Is it limiting the repair or maintenance to just this list, or is it just this list of items that council is interested in? Thought needs to be given to the wording. What if submitter wants to repair letterbox, or replant roadside landscaping (just two basic examples).	Amend to express the intent of the rule more clearly (inferred)
P S Yates Family Trust (S333)	S333.067	Coastal environment	CE-R2	Oppose	There is no need not be a rule for an activity class of repair and maintenance. Repairs and maintenance should be otherwise be permitted under the respective rules relating to the buildings, earthworks and indigenous vegetation clearance activity classes within the overlay. Those rules (as sought to be amended by this submission) most effectively and efficiently manage the effects of relevant activities on the resources managed by the overlay. Unforeseen consequences will result with the rule as drafted where classes of repairs and maintenance not listed will fall to discretionary activity, triggering costly and unnecessary consent processes. An example is existing houses in the coastal environment, whereby their repair and maintenance (including any normal domestic maintenance) would trigger a full discretionary activity resource consent because they are not specified in the repair or maintenance rule.	Delete Rule CE-R2
Northland Federated Farmers of New Zealand (S421)	S421.187	Coastal environment	CE-R2	Support	Federated Farmers supports rule CE-R2 as it is drafted in the proposed district plan	Retain Rule CE-R2

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Kingheim Limited (S461)	S461.003	Coastal environment	CE-R2	Oppose	Rule CE-R2 'Repair or maintenance' is unnecessarily restrictive and should be deleted. Under the current wording, any slight changes to existing fences, roads, network utilities, driveways and access, walking tracks, cycling tracks and farming tracks will trigger the need for resource consent	delete CE-R2
Waiaua Bay Farm Limited (S463)	S463.061	Coastal environment	CE-R2	Support	It is appropriate to provide a permitted activity status for repairs or maintenance of the listed structures.	Retain Rule CE-R2.
Top Energy Limited (S483)	S483.173	Coastal environment	CE-R2	Support	Top Energy supports the repair or maintenance of network utilities as a permitted activity.	Retain Rule CE-R2
Northland Planning and Development 2020 Limited (S502)	S502.017	Coastal environment	CE-R2	Support in part	<p>We are unsure whether it is the intent of the plan to cover just historic features or whether this rule seeks to extend wider to other elements which may not be historic. Regardless of this fact we seek that the following features also be added as they are similar in nature to others described within the list. These features are common within the coastal environment and require ongoing repair and maintenance to ensure there are no adverse impacts on the surrounding environment and that they remain in good condition. It is considered unnecessary for additional consent to be required for repair and maintenance of such features, if the size, scale and materials used are like for like.</p> <p>The same is considered to apply for buildings and structures. The Operative Plan provided for renovation and maintenance of buildings as a permitted activity, with no requirement for scale, size and materials being like for like. It is considered that with the additional control of requiring scale, size and materials to be like for like, this will ensure that any repair and maintenance on buildings and/or structures does not change how the natural character of the coastal environment is perceived. Once again, repair and maintenance of lawfully established buildings and structures is required on an on-</p>	<p>Amend PER-1 of Rule CE-R2 to include four additional points as follows:8. Carparking areas9. Board walks10. Boat ramps11. Buildings or structures</p> <p>In the event the above relief is not accepted, we seek that the changes be imposed insofar as the Waitangi Estate.</p>

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					going basis to ensure that the natural character of the coastal environment is preserved and enhanced.	
Waitangi Limited (S503)	S503.015	Coastal environment	CE-R2	Not Stated	<p>We are unsure whether it is the intent of the plan to cover just historic features or whether this rule seeks to extend wider to other elements which may not be historic. Regardless of this fact we seek that the following features also be added as they are similar in nature to others described within the list. These features are common within the coastal environment and require ongoing repair and maintenance to ensure there are no adverse impacts on the surrounding environment and that they remain in good condition. It is considered unnecessary for additional consent to be required for repair and maintenance of such features, if the size, scale and materials used are like for like.</p> <p>The same is considered to apply for buildings and structures. The Operative Plan provided for renovation and maintenance of buildings as a permitted activity, with no requirement for scale, size and materials being like for like. It is considered that with the additional control of requiring scale, size and materials to be like for like, this will ensure that any repair and maintenance on buildings and/or structures does not change how the natural character of the coastal environment is perceived. Once again, repair and maintenance of lawfully established buildings and structures is required on an on-going basis to ensure that the natural character of the coastal environment is preserved and enhanced.</p>	Amend PER-1 of Rule CE-R2 to include four additional points as follows: 8. Carparking areas 9. Board walks 10. Boat ramps 11. Buildings or structures In the event the above relief is not accepted, we seek that the changes be imposed insofar as the Waitangi Estate.
Lynley Newport (S122)	S122.001	Coastal environment	CE-R3	Support in part	<p>Rule IB-R1 permits certain indigenous vegetation clearance in "All Zones", including up to 1,000m² clearance to provide for a single residential unit, on-site services and its access, and to create or maintain a setback between a vulnerable building and vegetation. I have supported both these permitted activity clearance provisions, albeit it submitted that</p>	Amend CE-R3, PER-1: The earthworks or indigenous vegetation clearances: 1..... through 5, then add new 6. provided for as a permitted activity in Rule IB-R1 of this Plan. PER-1 & PER-2: Amend the category of activity

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					<p>1,000m2 is insufficient for dwelling, on-site servicing and access.</p> <p>No reference back to IB-R1 is included in CE-R3, PER-1. Given the clear intent of IB-R1, which is to recognise there are certain instances where limited indigenous vegetation clearance should be permitted, there should be a reference to this permitted activity in CE-R3, PER-1.</p> <p>CE-S3 is too restrictive overall. To make any indigenous clearance in an outstanding natural character area in the coastal environment a non complying activity is overly limiting and in conflict with objectives and policies in the Natural Hazards chapter regarding wildfire. Also to make any cut/fill face of more than a 1m height a non complying activity is ridiculously restrictive.</p> <p>I suggest a bit of re-set for CE-R3, PER-1, PER-2 and S3.</p>	<p>column such that the inability to achieve both/either PER-1 and PER-2 results in discretionary activity status.</p>
Horticulture New Zealand (S159)	S159.076	Coastal environment	CE-R3	Support in part	<p>Earthworks and clearance for biosecurity purposes is supported. Support providing for ancillary rural earthworks as a permitted activity to enable the ongoing productive use of land in rural environments.</p>	<p>Amend PER 1 of Rule CE-R3 to include: 6. The earthworks are ancillary rural earthworks</p>
Bentzen Farm Limited (S167)	S167.077	Coastal environment	CE-R3	Oppose	<p>Farming activities are typically part of the coastal environment and not providing for such activities would impose significant consent cost and risks on landowners.</p> <p>Exceptions are required and the need is heightened by the very broad definition of "earthworks" under the National Planning Standard 2019 that has been adopted in the plan.</p> <p>The policy CE-P10, provides the necessary matters of assessment and are sought to be repeated in the rule, with the addition of new matters.</p>	<p>Amend Rule CE-R3 as follows: Activity status: Permitted Where: PER-1 The earthworks or indigenous vegetation clearance is: 1. required for the repair or maintenance permitted under CE-R2 Repair or maintenance. 1. Required for the repair or maintenance of the following activities where they have been lawfully established and where the size, scale and materials used are like for like: 1. roads. 2. fences. 3. network utilities. 4. driveways</p>

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						<p>and access 5. walking tracks 6. cycling tracks 7. farming tracks. 2. required to provide for safe and reasonable clearance for existing overhead power lines. 3. necessary to address a risk to public health and safety. 4. for biosecurity reasons. 5. for the sustainable non-commercial harvest of plant material for rongoā Māori. 6. for vegetation clearance required to establish or maintain a firebreak within 20m of a dwelling. 7. for cultivation (for earthworks only) or domestic gardens. 8. for ecosystem protection, rehabilitation or restoration works. 9. required to maintain an operational farm (including the maintenance or reinstatement of pasture where the vegetation to be cleared is less than 15 years old and less than 6m in height) or operate a plantation forestry activity. 10. required for vegetation clearance to maintain an existing driveway to a dwelling, within 5m of that driveway. 11. required for vegetation clearance as a strip of no more</p>

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						<p>than 3.5m wide to construct new fences for the purpose of stock control or boundary delineation.12. required for vegetation clearance within the legal width of an existing formed road.</p> <p>PER-2Except as permitted under PER-1, Tthe earthworks or indigenous vegetation clearance is not provided for within CE-R3 PER-1 but it complies with standard CE-S3 Earthworks or indigenous vegetation clearance</p> <p>Amend the activity status where compliance is not achieved with rules PER-1 and PER-2 from discretionary /non complying to restricted discretionary in the case of each rule.</p> <p>Add a matter of discretion as follows:1. The effects characteristics, values and qualities of the coastal environment, having regard to:a. the temporary or permanent nature of any adverse effects;b. the ability of the environment to absorb change;c. the need for and location of earthworks or vegetation clearance;d. the</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>operational or functional need of any regionally significant infrastructure to be sited in the particular location;e. Except as provided for under k and l below, any viable alternative locations for the activity or development outside the coastal environment;f. any historical, spiritual or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6;g. the likelihood of the activity exacerbating natural hazards;h. the ability to improve the overall quality of coastal waters; andi. any positive contribution the development has on the characteristics and qualities.j. Whether locating the activity within the coastal environment is required to enable reasonable residential or farming use.k. Whether the location is on a previously approved building platform or access drive.</p> <p>Add new clause as follows:Earthworks or indigenous vegetation clearance which do not comply</p>

SUMMARY OF SUBMISSIONS

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>with PER1, PER2 or PER3 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</p>
<p>Setar Thirty Six Limited (S168)</p>	<p>S168.076</p>	<p>Coastal environment</p>	<p>CE-R3</p>	<p>Oppose</p>	<p>More exceptions for normal farming and rural practices should be provided for. In this regard, farming activities are typically part of the coastal environment and not providing for such activities would impose significant consent cost and risks on landowners. Where such areas are not farmed, then the vegetation controls provide protection from inappropriate use and development. In particular, exceptions are required for:</p> <ul style="list-style-type: none"> - Maintenance of fire breaks (for ecosystem protection and providing for the health and safety of people) - Cultivation and domestic gardens (continuation of domestic and rural activities). - Ecosystem protection and enhancement (where vegetation may need to be thinned to release new plantings) - Maintenance of driveways and roads. <p>The need for such exemptions is heightened by the very broad definition of "earthworks" under the National Planning Standard 2019 that has been adopted in the plan. Almost all ground disturbance is captured by the control.</p> <p>In each instance non-conformity should be a restricted discretionary activity. The scope of assessment is limited and the potential effects well- understood and able to be categorised as</p>	<p>Amend Rule CE-R3 as follows:</p> <p>status: Permitted Where: PER-1 The earthworks or indigenous vegetation clearance is: 1. required for the repair or maintenance permitted under CE-R2 Repair or maintenance. 1. Required for the repair or maintenance of the following activities where they have been lawfully established and where the size, scale and materials used are like for like: 1. roads.2. fences3. network utilities4. driveways and access5. walking tracks6. cycling tracks7. farming tracks. 2. required to provide for safe and reasonable clearance for existing overhead power lines. 3. necessary to address a risk to public health and safety.</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>assessment matters. The policy CE-P10, provides the necessary matters of assessment and are sought to be repeated in the rule, with the addition of new matters:</p> <ul style="list-style-type: none"> - Whether locating the activity within the ONF or ONL area is required to enable reasonable residential or farming use of the lot. - Whether the location is on a previously approved building platform. <p>The importance of providing for development on previously approved building platforms is discussed earlier in this submission.</p> <p>As essentially a technical assessment against a defined set of matters, a non-notification rule is appropriate as it will avoid unnecessary consent cost and risk burden on landowners.</p>	<p>4. for biosecurity reasons. 5. for the sustainable non-commercial harvest of plant material for rongoā Māori. 6. for vegetation clearance required to establish or maintain a firebreak within 20m of a dwelling. 7. for cultivation (for earthworks only) or domestic gardens. 8. for ecosystem protection, rehabilitation or restoration works. 9. required to maintain an operational farm (including the maintenance or reinstatement of pasture where the vegetation to be cleared is less than 15 years old and less than 6m in height) or operate a plantation forestry activity. 10. required for vegetation clearance to maintain an existing driveway to a dwelling, within 5m of that driveway. 11. required for vegetation clearance as a strip of no more than 3.5m wide to construct new fences for the purpose of stock control or boundary delineation. 12. required for vegetation clearance within the legal width of an existing formed road.</p>

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

SUMMARY OF SUBMISSIONS

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>development outside the coastal environment;f. any historical, spiritual or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6;g. the likelihood of the activity exacerbating natural hazards;h. the ability to improve the overall quality of coastal waters; andi. any positive contribution the development has on the characteristics and qualities.j. Whether locating the activity within the coastal environment is required to enable reasonable residential or farming use.k. Whether the location is on a previously approved building platform or access drive. Insert a new clause as follows:Earthworks or indigenous vegetation clearance which do not comply with PER1, PER2 or PER3 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						under section 95B(2) and (3).
Suzanne Linda Ashmore (S169)	S169.004	Coastal environment	CE-R3	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Rule CE-R3 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment	Amend Rule CE-R3 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF
Cavalli Properties Limited (S177)	S177.004	Coastal environment	CE-R3	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Rule CE-R3 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment	Amend Rule CE-R3 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF
The Shooting Box Limited (S187)	S187.067	Coastal environment	CE-R3	Oppose	Refer to submission for detailed reasons for decision(s) requested relating, but not limited to, to the following: more exceptions for normal farming and rural practices should be provided for; need for such exemptions is heightened by the very broad definition of 'earthworks' under the National Planning Standard that has been adopted in the plan; non-conformity should be a restricted discretionary activity - CE-P10 provides the necessary matters of assessment and are sought to be repeated in the rule, with the addition a some new matters.	Amend Rule CE-R3 as follows: Activity status: Permitted Where: PER-1 The earthworks or indigenous vegetation clearance is: 1. required for the repair or maintenance permitted under CE-R2 Repair or maintenance. 1. Required for the repair or maintenance of the following activities where they have been lawfully established and where the size, scale and materials used are like for like: 1. roads. 2. fences. 3. network utilities 4. driveways

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>and access5. walking tracks6. cycling tracks7. farming tracks.</p> <p>2. required to provide for safe and reasonable clearance for existing overhead power lines.</p> <p>3. necessary to address a risk to public health and safety.</p> <p>4. for biosecurity reasons.</p> <p>5. for the sustainable non-commercial harvest of plant material for rongoā Maori6. for vegetation clearance required to establish or maintain a firebreak within 20m of a dwelling.7. for cultivation (for earthworks only) or domestic gardens.8. for ecosystem protection, rehabilitation or restoration works.9. required to maintain an operational farm (including the maintenance or reinstatement of pasture where the vegetation to be cleared is less than 15 years old and less than 6m in height) or operate a plantation forestry activity.10. required for vegetation clearance to maintain an existing driveway to a dwelling, within 5m of that driveway.11. required for vegetation clearance as a strip</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>of no more than 3.5m wide to construct new fences for the purpose of stock control or boundary delineation.12. required for vegetation clearance within the legal width of an existing formed road.</p> <p>PER-2Except as permitted under PER-1, ¶the earthworks or indigenous vegetation clearance is not provided for within CE-R3 PER-1 but it complies with standard CE-S3 Earthworks or indigenous vegetation clearance</p> <p>Amend the activity status where compliance is not achieved with rules PER-1 and PER-2 from discretionary /non complying to restricted discretionary in the case of each rule.</p> <p>Add a matter of discretion as follows:1. The effects characteristics, values and qualities of the coastal environment, having regard to:a. the temporary or permanent nature of any adverse effectsb. the ability of the environment to absorb changec. the need for and location of earthworks or</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>vegetation clearance.d. the operational or functional need of any regionally significant infrastructure to be sited in the particular location;e. Except as provided for under k and l below, any viable alternative locations for the activity or development outside the coastal environment;f. any historical, spiritual or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6g. the likelihood of the activity exacerbating natural hazards;h. the ability to improve the overall quality of coastal waters; andi. any positive contribution the development has on the characteristics and qualities.j. Whether locating the activity within the coastal environment is required to enable reasonable residential or farming use.k. Whether the location is on a previously approved building platform or access drive.</p> <p>Add new clause as follows:Earthworks or indigenous vegetation</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						clearance which do not comply with PER1, PER2 or PER3 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).
Wendover Two Limited (S222)	S222.069	Coastal environment	CE-R3	Oppose	<p>More exceptions for normal farming and rural practices should be provided for. In this regard, farming activities are typically part of the coastal environment and not providing for such activities would impose significant consent cost and risks on landowners. Where such areas are not farmed, then the vegetation controls provide protection from inappropriate use and development. In particular, exceptions are required for:</p> <ul style="list-style-type: none"> - Maintenance of fire breaks (for ecosystem protection and providing for the health and safety of people) - Cultivation and domestic gardens (continuation of domestic and rural activities). - Ecosystem protection and enhancement (where vegetation may need to be thinned to release new plantings) - Maintenance of driveways and roads. <p>The need for such exemptions is heightened by the very broad definition of "earthworks" under the National Planning Standard 2019 that has been adopted in the plan. Almost all ground disturbance is captured by the control. In each instance non conformity should be a restricted discretionary activity. The scope of assessment is limited and the potential effects well</p>	<p>Amend Rule CE-R3 as follows: Activity status: Permitted Where: PER-1 The earthworks or indigenous vegetation clearance is: 1. required for the repair or maintenance permitted under CE-R2 Repair or maintenance. 1. Required for the repair or maintenance of the following activities where they have been lawfully established and where the size, scale and materials used are like for like: 1. roads 2. fences 3. network utilities 4. driveways and access 5. walking tracks 6. cycling tracks 7. farming tracks. 2. required to provide for safe and reasonable clearance for existing overhead power lines. 3. necessary to address a risk to public health and safety. 4. for biosecurity reasons.</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>understood and able to be categorised as assessment matters. The policy CE-P10, provides the necessary matters of assessment and are sought to be repeated in the rule, with the addition of new matters:</p> <ul style="list-style-type: none"> - Whether locating the activity within the ONF or ONL area is required to enable reasonable residential or farming use of the lot. - Whether the location is on a previously approved building platform. <p>The importance of providing for development on previously approved building platforms is discussed earlier in this submission.</p> <p>As essentially a technical assessment against a defined set of matters, a non-notification rule is appropriate as it will avoid unnecessary consent cost and risk burden on landowners.</p>	<p>5. for the sustainable non-commercial harvest of plant material for rongoā Māori.6. for vegetation clearance required to establish or maintain a firebreak within 20m of a dwelling.7. for cultivation (for earthworks only) or domestic gardens.8. for ecosystem protection, rehabilitation or restoration works.9. required to maintain an operational farm (including the maintenance or reinstatement of pasture where the vegetation to be cleared is less than 15 years old and less than 6m in height) or operate a plantation forestry activity.10. required for vegetation clearance to maintain an existing driveway to a dwelling, within 5m of that driveway.11. required for vegetation clearance as a strip of no more than 3.5m wide to construct new fences for the purpose of stock control or boundary delineation.12. required for vegetation clearance within the legal width of an existing formed road.</p> <p>PER-2Except as permitted</p>

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

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>development outside the coastal environment;f. any historical, spiritual or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6;g. the likelihood of the activity exacerbating natural hazards;h. the ability to improve the overall quality of coastal waters; andi. any positive contribution the development has on the characteristics and qualities.j. Whether locating the activity within the coastal environment is required to enable reasonable residential or farming use.</p> <p>Insert a new clause as follows:Earthworks or indigenous vegetation clearance which do not comply with PER1, PER2 or PER3 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Matauri Trustee Limited (S243)	S243.095	Coastal environment	CE-R3	Oppose	<p>More exceptions for normal farming and rural practices should be provided for. In this regard, farming activities are typically part of the coastal environment and not providing for such activities would impose significant consent cost and risks on landowners. Where such areas are not farmed, then the vegetation controls provide protection from inappropriate use and development. In particular, exceptions are required for:</p> <ul style="list-style-type: none"> - Maintenance of fire breaks (for ecosystem protection and providing for the health and safety of people) - Cultivation and domestic gardens (continuation of domestic and rural activities). - Ecosystem protection and enhancement (where vegetation may need to be thinned to release new plantings) - Maintenance of driveways and roads <p>The need for such exemptions is heightened by the very broad definition of "earthworks" under the National Planning Standard 2019 that has been adopted in the plan. Almost all ground disturbance is captured by the control. In each instance non-conformity should be a restricted discretionary activity. The scope of assessment is limited and the potential effects well understood and able to be categorised as assessment matters. The policy CE-P10, provides the necessary matters of assessment and are sought to be repeated in the rule, with the addition of new matters:</p> <ul style="list-style-type: none"> - Whether locating the activity within the ONF or ONL area is required to enable reasonable residential or farming use of the lot. - Whether the location is on a previously approved building platform. <p>The importance of providing for development on previously approved building platforms is discussed earlier in this submission. As essentially a technical assessment against a defined set of matters, a non-notification rule is</p>	<p>Amend Rule CE-R3 as follows: Activity status: Permitted Where: PER-1 The earthworks or indigenous vegetation clearance is: 1. required for the repair or maintenance permitted under CE-R2 Repair or maintenance. 1. Required for the repair or maintenance of the following activities where they have been lawfully established and where the size, scale and materials used are like for like: 1. roads.2. fences3. network utilities4. driveways and access5. walking tracks6. cycling tracks7. farming tracks. 2. required to provide for safe and reasonable clearance for existing overhead power lines. 3. necessary to address a risk to public health and safety. 4. for biosecurity reasons. 5. for the sustainable non-commercial harvest of plant material for rongoā Māori. 6. for vegetation clearance required to establish or maintain a firebreak within 20m of a dwelling.7. for cultivation (for earthworks only) or domestic gardens.8. for ecosystem protection, rehabilitation or</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>appropriate as it will avoid unnecessary consent cost and risk burden on landowners.</p>	<p>restoration works.9. required to maintain an operational farm (including the maintenance or reinstatement of pasture where the vegetation to be cleared is less than 15 years old and less than 6m in height) or operate a plantation forestry activity.10. required for vegetation clearance to maintain an existing driveway to a dwelling, within 5m of that driveway.11. required for vegetation clearance as a strip of no more than 3.5m wide to construct new fences for the purpose of stock control or boundary delineation.12. required for vegetation clearance within the legal width of an existing formed road.</p> <p>PER-2Except as permitted under PER-1, the earthworks or indigenous vegetation clearance is not provided for within CE-R3 PER-1 but it complies with standard CE-S3 Earthworks or indigenous vegetation clearance Amend the activity status where compliance is not achieved with rules PER-1 and PER-2 from</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>discretionary/non complying to restricted discretionary in the case of each rule.</p> <p>Add a matter of discretion as follows:1. The effects characteristics, values and qualities of the coastal environment, having regard to:a. the temporary or permanent nature of any adverse effects;b. the ability of the environment to absorb change;c. the need for and location of earthworks or vegetation clearance;d. the operational or functional need of any regionally significant infrastructure to be sited in the particular location;e. Except as provided for under k and l below, any viable alternative locations for the activity or development outside the coastal environment;f. any historical, spiritual or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6;g. the likelihood of the activity exacerbating natural hazards;h. the ability to improve the overall quality of coastal waters; andi. any</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>positive contribution the development has on the characteristics and qualities.j. Whether locating the activity within the coastal environment is required to enable reasonable residential or farming use.k. Whether the location is on a previously approved building platform or access drive. Add new clause as follows:Earthworks or indigenous vegetation clearance which do not comply with PER1, PER2 or PER3 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</p>
Waitoto Development Limited (S263)	S263.034	Coastal environment	CE-R3	Oppose	The submitter considers that rule CE-R3 should not apply to the Orongo Bay Special Purpose Zone which should be exempt from this rule.	Delete rule CE-R3 as it applies to the Orongo Bay Special Purpose Zone.
P S Yates Family Trust (S333)	S333.068	Coastal environment	CE-R3	Oppose	More exceptions for normal farming and rural practices should be provided for. In this regard, farming activities are typically part of the coastal environment and not providing for such activities would impose significant consent cost and risks on landowners. Where such areas are not farmed, then the vegetation controls provide	Amend Rule CE-R3 as follows: <i>Activity status: Permitted Where: PER-1 The earthworks or indigenousvegetation clearance</i>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>protection from inappropriate use and development. In particular, exceptions are required for:</p> <ul style="list-style-type: none"> - Maintenance of fire breaks (for ecosystem protection and providing for the health and safety of people) - Cultivation and domestic gardens (continuation of domestic and rural activities). - Ecosystem protection and enhancement (where vegetation may need to be thinned to release new plantings) - Maintenance of driveways and roads. <p>The need for such exemptions is heightened by the very broad definition of "earthworks" under the National Planning Standard 2019 that has been adopted in the plan. Almost all ground disturbance is captured by the control. In each instance non conformity should be a restricted discretionary activity. The scope of assessment is limited and the potential effects well-understood and able to be categorised as assessment matters. The policy CE-P10, provides the necessary matters of assessment and are sought to be repeated in the rule, with the addition of new matters: Whether locating the activity within the ONF or ONL area is required to enable reasonable residential or farming use of the lot.</p> <ul style="list-style-type: none"> - Whether the location is on a previously approved building platform. <p>The importance of providing for development on previously approved building platforms is discussed earlier in this submission. As essentially a technical assessment against a defined set of matters, a non-notification rule is appropriate as it will avoid unnecessary consent cost and risk burden on landowners.</p>	<p>is: 1. required for the repair or maintenance permitted under CE-R2 Repair or maintenance. <i>1. Required for the repair or maintenance of the following activities where they have been lawfully established and where the size, scale and materials used are like for like: 1. roads. 2. fences 3. network utilities 4. driveways and access 5. walking tracks 6. cycling tracks 7. farming tracks. 2. required to provide for safe and reasonable clearance for existing overhead power lines. 3. necessary to address a risk to public health and safety. 4. for biosecurity reasons. 5. for the sustainable non-commercial harvest of plant material for rongoā Māori. 6. for vegetation clearance required to establish or maintain a firebreak within 20m of a dwelling. 7. for cultivation (for earthworks only) or domestic gardens. 8. for ecosystem protection, rehabilitation or restoration works. 9. required to maintain an operational farm (including the maintenance or reinstatement of pasture</i></p>

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						<p>where the vegetation to be cleared is less than 15 years old and less than 6m in height) or operate a plantation forestry activity. 10. required for vegetation clearance to maintain an existing driveway to a dwelling, within 5m of that driveway. 11. required for vegetation clearance as a strip of no more than 3.5m wide to construct new fences for the purpose of stock control or boundary delineation. 12. required for vegetation clearance within the legal width of an existing formed road. PER-2 Except as permitted under PER-1, the earthworks or indigenous vegetation clearance is not provided for within CE-R3 PER-1 but it complies with standard CE-S3 Earthworks or indigenous vegetation clearance Amend the activity status where compliance is not achieved with rules PER-1 and PER-2 from discretionary /non complying to restricted discretionary in the case of each rule. Insert a matter of discretion as follows: 1. The</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p><i>effects characteristics, values and qualities of the coastal environment, having regard to:</i></p> <ul style="list-style-type: none"> a. <i>the temporary or permanent nature of any adverse effects;</i> b. <i>the ability of the environment to absorb change;</i> c. <i>the need for and location of earthworks or vegetation clearance;</i> d. the operational or functional need of any regionally significant infrastructure to be sited in the particular location; e. <i>Except as provided for under k and l below, any viable alternative locations for the activity or development outside the coastal environment;</i> f. <i>any historical, spiritual or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6;</i> g. <i>the likelihood of the activity exacerbating natural hazards;</i> h. <i>the ability to improve the overall quality of coastal waters; and</i> i. <i>any positive contribution the development has on the characteristics and qualities.</i> j. <i>Whether locating the activity within the coastal environment is required to enable reasonable residential or farming use.</i> k.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						<p>Whether the location is on a previously approved building platform or access drive. Insert new clause as follows:<i>Earthworks or indigenous vegetation clearance which do not comply with PER1, PER2 or PER3 shall be assessed without public or limited notification under sections 95A and 95B of the Resource Management Act unless special circumstances exist or notification is required under section 95B(2) and (3).</i></p>
Director-General of Conservation (Department of Conservation) (S364)	S364.070	Coastal environment	CE-R3	Oppose	The Director-General considers that proposed Rule CE-R3 does not adequately give effect to Policy 11 of NZCPS.	Delete Rule CE-R3. Alternatively clarify how Rule CE-R3 gives effect to Policy 11 of the NZCPS.
Director-General of Conservation (Department of Conservation) (S364)	S364.071	Coastal environment	CE-R3	Oppose	The Director-General requests clarity on the inclusion of vegetation clearance for biosecurity reasons. For example, in what circumstances would an unlimited amount of indigenous vegetation be cleared as a Permitted Activity for biosecurity reasons? Can any member of the public remove indigenous vegetation for biosecurity reasons or is it only specific organisations/entities?	Amend Rule CE-R3 to clarify the inclusion of vegetation clearance for biosecurity reasons. Insert a definition for "biosecurity reasons", if appropriate. For example, limit to 'pest' and 'unwanted organism' as defined in the Biosecurity Act 1993.
Northland Federated Farmers of New	S421.188	Coastal environment	CE-R3	Oppose	Federated Farmers seeks the deletion of rule CE-R3. The rule contains unnecessary duplication from the zoning, earthworks and indigenous biodiversity chapters which already	Delete Rule CE-R3

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Zealand (S421)					include provisions to appropriately manage earthworks and vegetation clearance.	
John Andrew Riddell (S431)	S431.040	Coastal environment	CE-R3	Not Stated	Not stated	Amend Rule CE-R3 so that it does not apply to earthworks or indigenous vegetation clearance within an urban zone
Kapiro Conservation Trust (S442)	S442.119	Coastal environment	CE-R3	Oppose	There is a risk that including this rule will lead to contradictions with the IB and earthwork rules. The standards do look more strict than the IB chapter for areas that are in a ONC, HNC and other	Delete CE-R3 in first instance Or Amend to include conditions that ensure compliance with the IB and earthworks rules or make them even more strict.
Kapiro Conservation Trust (S442)	S442.160	Coastal environment	CE-R3	Support	This rule provides reasonable protection for natural character values.	Retain Rule CE-R3 Clarify that any "natural wetland" includes riparian margins.
Pacific Eco-Logic (S451)	S451.016	Coastal environment	CE-R3	Support	This rule provides reasonable protection for natural character values	Retain Rule CE-R3 Clarify that any "natural wetland" includes riparian margins
Waiaua Bay Farm Limited (S463)	S463.062	Coastal environment	CE-R3	Oppose	The result of clause PER-2 of this rule is to impose permitted limits (via standard CE-S3) on earthworks or indigenous vegetation clearance of: Nil permitted in the ONC80 area that the Proposed Plan seeks to apply to the Totara Forest; 50 m ² for 10 years (i.e. 5 m ² per year) in a HNC area such as covers extensive areas of Kauri Cliffs coastal margin; and 400 m ² for 10 years (i.e., 40 m ² per year) for areas in the coastal environment but not in outstanding or high natural character areas. If these meagre permitted limits are breached, a non-complying activity status applies. It is guaranteed that WBF will need to breach these permitted limits during the term of the Proposed Plan if it is to carry out golf course maintenance, track construction and maintenance, vegetation management and	Amend PER-2 of Rule CE-R3 as follows: PER-2 The earthworks or indigenous vegetation clearance is not provided for within CE-R3 PER-1 but it: 1. complies with standard CE-S3 Earthworks or indigenous vegetation clearance; or 2. is in the Golf Living, Golf Playing or Lodge subzones of the Kauri Cliffs zone Insert the following additional activity status for PER-2 of Rule CE-R3 as follows: Activity status where compliance not

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					<p>infrastructure installation duties/activities that are part of its regular operations. It goes without saying that the future residential subdivision of land in the Golf Living subzone will, where it encroaches into the coastal environment, also breach these highly restrictive provisions.</p> <p>The consequential non-complying activity status is a highly onerous regulatory intervention that is in WBF's opinion, likely to generate ongoing resource consenting burdens. These will be of little/no benefit to the environment or the community but a significant drag on resources that could be better allocated to WBFs business and ecological restoration activities.</p>	<p>achieved with PER-2 in the Kauri Cliffs Zone: Discretionary</p>
<p>Top Energy Limited (S483)</p>	<p>S483.175</p>	<p>Coastal environment</p>	<p>CE-R3</p>	<p>Not Stated</p>	<p>Top Energy supports-R3 in particular PER-1 (2) but seeks that this be extended to provide for upgrades as provided for in the new rule sought</p>	<p>Amend PER 1 of Rule CE-R3 as follows (or to the same effect) to provide for earthworks and vegetation clearance associated with upgrades of infrastructure as a permitted activity.</p> <p>PER-1</p> <p>The earthworks or indigenous vegetation clearance is:</p> <p>1.required for repair or maintenance permitted under CE-R2 Repair or Maintenance-; or</p> <p>2.required to provide for safe and reasonable clearance for existing overhead power lines-; or</p> <p>3.necessary to ensure the health and safety of the public-; or</p> <p>f.for biosecurity reasons-; or</p> <p>5.for the sustainable non-commercial harvest of plant material for rongoā Māori-;</p>

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						or6.Required for the upgrade of network utilities where the works are permitted by CE-RX
Royal Forest and Bird Protection Society of New Zealand (S511)	S511.100	Coastal environment	CE-R3	Oppose	There is a risk that including this rule will lead to contradictions with the IB and earthwork rules. The standards do look more strict than the IB chapter for areas that are in a ONC, HNC and other	Delete CE-R3 in first instance Or Amend to include conditions that ensure compliance with the IB and earthworks rules or make them even more strict
Fire and Emergency New Zealand (S512)	S512.036	Coastal environment	CE-R3	Support in part	Fire and Emergency may be required to remove vegetation in the event of an emergency or to reduce fire risk. This is enabled under Section 65 and 68 of the Fire and Emergency New Zealand Act 2017. The exact quantities of vegetation disturbance required cannot be determined in advance, and will be unique to the risk or emergency response required. Fire and Emergency considers that the reference to managing fire risk and so recommends similar language as in IB-R1 so that the plan aligns with the actions required by Fire and Emergency personnel under the Fire and Emergency New Zealand Act 2017.	amend CE-R3 2. required to provide for safe and reasonable clearance for existing overhead power lines. 3. necessary to address a risk to public health and safety or damage to property.4. To create and/or maintain firebreaks to manage fire risk 5. for biosecurity reasons
Horticulture New Zealand (S159)	S159.077	Coastal environment	CE-R4	Oppose	Existing use rights should apply to lawfully established farming activities. Restrictions should only apply to a new farming activity with farming inside a high natural character area should be controlled and inside an outstanding natural character area RDIS.	Amend PER-1 of Rule CE-R4 as follows: The farming activity is located outside high or outstanding natural character areas. The rural production activity is lawfully established or a new rural production activity outside high or outstanding natural character areas. Amend activity status where

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						<p>compliance with PER-1 not achieved:Discretionary (outside an outstanding natural character area)Non-complying (inside an outstanding natural character area)Controlled inside high natural character areas Restricted Discretionary inside an outstanding natural character area</p> <p>Amend the reference to 'farming' to 'rural production' activities</p>
<p>Bentzen Farm Limited (S167)</p>	<p>S167.078</p>	<p>Coastal environment</p>	<p>CE-R4</p>	<p>Oppose</p>	<p>This does not implement policy CE-P6 of the Proposed Plan which recognises that that farming should be provided for in the coastal environment.</p> <p>While existing farms may be protected by existing use rights, new farming methods or practices may not be, and may trigger the need for a resource consent with the rule as proposed.</p> <p>The rule will impose significant compliance costs on existing farms where resource consents may be required for every new aspect of their operation.</p> <p>As per the overview explanation of overlays in the Proposed Plan, where there is no specific rule relevant to the activity, then it reverts to its underlying zoning. If this is the case, the then the rule can and should be deleted for the reasons above.</p>	<p>Delete rule CE-R4 (assuming reliance can then be placed on the activity status for farming in the underlying zoning as per "Applications Subject to Multiple Provisions" section of the Proposed Plan)Or, in the alternative, Amend rule CE-R4 so that Farming is a permitted activity in the overlay.</p> <p>Amend rule CE-R4 as follows: Activity status: PermittedWhere:PER-1The farming activity is located outside high or outstanding natural character areas.Activity status where compliance is not achieved with PER-1:Discretionary (outside an outstanding natural character</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						area)Non-complying (inside an outstanding natural character area)Activity status where compliance not achieved: Not applicable
Suzanne Linda Ashmore (S169)	S169.005	Coastal environment	CE-R4	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Rule CE-R4 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment	Amend Rule CE-R4 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF
Cavalli Properties Limited (S177)	S177.005	Coastal environment	CE-R4	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Rule CE-R4 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment	Amend Rule CE-R4 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF
Wendover Two Limited (S222)	S222.070	Coastal environment	CE-R4	Oppose	Under this rule, farming becomes a non-complying activity in the coastal environment when combined with the ONL or ONF overlay. This does not implement policy CE-P6 of the Proposed Plan which recognises that that farming should be provided for in the coastal environment. While existing farms may be protected by existing use rights, new farming methods or practices may not be, and may trigger the need for a resource consent with the rule as proposed. This ignores that in large sections of the district, working farms are in the coastal environment. The rule will impose	Delete rule CE-R4 (assuming reliance can then be placed on the activity status for farming in the underlying zoning as per "Applications Subject to Multiple Provisions" section of the Proposed Plan) Or, in the alternative Amend rule CE-R4 so that Farming is a permitted activity in the overlay as per the following: Activity status: Permitted Where: PER-1 The farming activity is located

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					<p>significant compliance costs on existing farms where resource consents may be required for every new aspect of their operation. The rule as proposed is not effective nor efficient as the effects on the coastal environment are better managed through controls on earthworks, vegetation clearance and buildings, rather than the activity of farming. As per the overview explanation of overlays in the Proposed Plan, where there is no specific rule relevant to the activity, then it reverts to its underlying zoning (for example, if Rural Production then farming is a permitted activity). If this is the case, the then the rule can and should be deleted for the reasons above. If that is not the case, then an alternative relief is sought that farming is a permitted activity in the overlay.</p>	<p>outside high or outstanding natural character areas. Activity status where compliance is not achieved with PER-1: Discretionary (outside an outstanding natural character area) Non-complying (inside an outstanding natural character area) Activity status where compliance not achieved: Not applicable</p>
<p>Matauri Trustee Limited (S243)</p>	<p>S243.096</p>	<p>Coastal environment</p>	<p>CE-R4</p>	<p>Oppose</p>	<p>Under this rule, farming becomes a non-complying activity in the coastal environment when combined with the ONL or ONF overlay. This does not implement policy CE-P6 of the Proposed Plan which recognises that that farming should be provided for in the coastal environment.</p> <p>While existing farms may be protected by existing use rights, new farming methods or practices may not be, and may trigger the need for a resource consent with the rule as proposed. This ignores that in large sections of the district, working farms are in the coastal environment.</p> <p>The rule will impose significant compliance costs on existing farms where resource consents may be required for every new aspect of their operation.</p> <p>The rule as proposed is not effective nor efficient as the effects on the coastal environment are better managed through controls on earthworks, vegetation clearance and buildings, rather than the activity of farming.</p>	<p>Delete rule CE-R4 (assuming reliance can then be placed on the activity status for farming in the underlying zoning as per "Applications Subject to Multiple Provisions" section of the Proposed Plan)</p> <p>Or, in the alternative, Amend rule CE-R4 so that Farming is a permitted activity in the overlay. Amend rule CE-R4 as follows: Activity status: Permitted Where: PER-1 The farming activity is located outside high or outstanding natural character areas. Activity status where compliance is not achieved with PER-1: Discretionary (outside an outstanding natural character area) Non-complying (inside an</p>

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					As per the overview explanation of overlays in the Proposed Plan, where there is no specific rule relevant to the activity, then it reverts to its underlying zoning (for example, if Rural Production then farming is a permitted activity). If this is the case, then the rule can and should be deleted for the reasons above. If that is not the case, then an alternative relief is sought that farming is a permitted activity in the overlay.	outstanding natural character area) Activity status where compliance not achieved: Not applicable
IDF Developments Limited (S253)	S253.005	Coastal environment	CE-R4	Oppose	Large areas of the district's coastline are farmed and this maintains the invasion of pest and weed species in proximity to the coastline. Stewardship of the land via farming practices should be encouraged within the district plan. The proposed rule is effectively taking land away from production activities	Delete the restriction preventing farming within high or outstanding natural character areas (inferred)
Northland Federated Farmers of New Zealand (S421)	S421.189	Coastal environment	CE-R4	Oppose	Federated Farmers supports the right of existing farm activities to occur as permitted activities within the coastal environment. We recognise that the majority of the high and outstanding natural character layers capture biodiversity and non-farming land as well as farmland. Federated Farmers wishes to ensure that any existing farming activities and farmland located in these overlays within the coastal environment are permitted to continue. It is not appropriate for the district plan not to provide for existing, lawfully established farming activities to continue in the coastal environment. It is important to ensure that existing farmland is preserved and allowed to continue for future generations with a balance needing to achieve with the maintenance of the existing values formed by the coastal area.	Amend Rule CE-R4 to provide for existing farming activities and farmland as permitted activities within the coastal environment
Waiaua Bay Farm Limited (S463)	S463.063	Coastal environment	CE-R4	Support	WBF agrees that it is appropriate to require resource consent for farming activities proposed in identified HNC or ONC areas.	Retain Rule CE-R4
Suzanne Linda	S169.006	Coastal environment	CE-R5	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any	Amend Rule CE-R5 so that it does not apply to land within the Coastal Environment overlay where such

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Ashmore (S169)					extent greater than provided for by the rules of the underlying zone. Rule CE-R5 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment	land is not within an ONC, ONL or ONF
Cavalli Properties Limited (S177)	S177.006	Coastal environment	CE-R5	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Rule CE-R5 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment	Amend Rule CE-R5 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF
Kapiro Conservation Trust (S442)	S442.120	Coastal environment	CE-R5	Support in part	CE-R5 fails to require the removal of demolished materials from a site.	Amend with conditions requiring the removal of demolition material.
Waiaua Bay Farm Limited (S463)	S463.064	Coastal environment	CE-R5	Support	WBF agrees with the unequivocal provision of a permitted activity status for demolition in the coastal environment.	Retain Rule CE-R5
Royal Forest and Bird Protection Society of New Zealand (S511)	S511.101	Coastal environment	CE-R5	Support in part	CE-R5 fails to require the removal of demolished materials from a site	Amend with conditions requiring the removal of demolition material
PF Olsen Limited (S91)	S91.014	Coastal environment	CE-R6	Oppose	There is no provision for non-complying activities under the Natural and Built Environments Bill. Plantation forests and plantation forestry activities are primary production activities in a working rural landscape. Where plantation forest already exists within the Coastal Environment, it should be considered as a permitted activity and the associated plantation forest activities should also be permitted.	Delete Rule CE-R6 Amend Rule CE-R6 to only apply to the afforestation of land in the Coastal Environment. Amend Rule CE-R6 to only apply to those plantation forest activities that have the potential to impact natural character, and these should be

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					<p>The permitted activity regulations of the NES-PF are appropriate to give effect to policies 11, 13, 15 and 22 of the New Zealand Coastal Policy Statement.</p> <p>Plantation forestry is a long term land use, with considerable financial inputs decades before any financial benefits are realised. To remove certainty of harvest and the ability to undertake other plantation forest activities is unreasonable and not commensurate with evidence based policies.</p> <p>The section 32 analysis states that there are more stringent rules for plantation forestry rule to give effect to policy 13(2) of the New Zealand Coastal Policy Statement. Based on this, plantation forestry activities that have the potential to impact on natural character should be the focus, not all plantation forestry activities and not the existence of the plantation forest. This is justification for a restricted discretionary rule for new afforestation and a controlled activity status for the other plantation forestry activities that have the potential to impact natural character in the Coastal Environment, as well as a permitted activity framework for the existing plantation forests.</p>	<p>controlled (RMA) or permitted (NBA) with appropriate matters of control or permitted activity standards.</p>
<p>Summit Forests New Zealand Limited (S148)</p>	<p>S148.033</p>	<p>Coastal environment</p>	<p>CE-R6</p>	<p>Not Stated</p>	<p>The chapter on the Coastal Environment fails to provide equitably for all primary production activities. In particular, it fails to recognise that, where plantation forestry already exists within the Coastal Environment, it should be considered as a legitimate part of the landscape and provided for as a permitted activity subject to the provisions of the NES-PF.</p> <p>While the notes to this chapter refer to the Plan's ability to establish more stringent rules than the NES-PF, no justification for this has been provided in the section 32 report and, doing so, would fail to meet the wider policies and objectives of the Plan for example PPROZ-01, RPROZ-03, RPROZ-04, and RPROZ-P1.</p>	<p>Delete CE-R6</p>

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Manulife Forest Management (NZ) Ltd (S160)	S160.026	Coastal environment	CE-R6	Oppose	The submitter is opposed to rule CE-R6 as it is considered that making production forestry a discretionary activity is onerous and it is already established in the coastal environment and is a valuable land use in the prevention of erosion.	Delete rule CE-R6
Suzanne Linda Ashmore (S169)	S169.007	Coastal environment	CE-R6	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Rule CE-R6 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment	Amend Rule CE-R6 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF
Cavalli Properties Limited (S177)	S177.007	Coastal environment	CE-R6	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Rule CE-R6 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment.	Amend Rule CE-R6 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF
Nicole Wooster (S259)	S259.016	Coastal environment	CE-R6	Support in part	Is the intent to control the planting of exotic plantation forests such as pine trees or any type of plantation forest e.g. manuka or totora? This may take on more importance as farmland is converted into different land uses with govt regulations promoting land use changes through freshwater regs and future emission taxes. Marginal farmland in the coastal environment may be converted into forestry for either milling or carbon credits. This is applicable to our property as a portion of the farm is in the coastal environment and environmentally / economically over time it may be more suited to forestry or carbon credits. You may for example plant manuka to then collect the oil as well. If you allowed the area to naturally regenerate (to avoid needing a	Amend rule to consider whether only exotic trees should require resource consent.

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					consent under the rule) then it would potentially be considered a SNA therefore you would want to have a plantation forest to be exempt.	
John Andrew Riddell (S431)	S431.041	Coastal environment	CE-R6	Not Stated	The proposed Plan is set out in the atomistic way required by the National Planning Standards. As a consequence, in addition to the amendments sought to the Kororāreka Russell Township Zone provisions, there are amendments needed to other chapters of the proposed Plan, including the Coastal Environment Overlay, Historic Heritage and Subdivision provisions for the reasons set out with respect to the provisions in the Kororāreka Russell Township zone.	Amend DIS-1 of Rule CE-R6 so that the activity is not located in high natural character areas as well as outstanding natural character areas
Suzanne Linda Ashmore (S169)	S169.008	Coastal environment	CE-R7	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Rule CE-R7 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment	Amend Rule CE-R7 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF
Cavalli Properties Limited (S177)	S177.008	Coastal environment	CE-R7	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Rule CE-R7 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment	Amend Rule CE-R7 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF
John Andrew Riddell (S431)	S431.042	Coastal environment	CE-R7	Not Stated	The proposed Plan is set out in the atomistic way required by the National Planning Standards. As a consequence, in addition to the amendments sought to the Kororāreka Russell Township Zone provisions, there are amendments needed to other chapters of the proposed Plan, including the Coastal Environment Overlay, Historic Heritage and	Amend DIS-1 of Rule CE-R7 so that the activity is not located in high natural character areas as well as outstanding natural character areas

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Subdivision provisions for the reasons set out with respect to the provisions in the Kororāreka Russell Township zone.	
Suzanne Linda Ashmore (S169)	S169.009	Coastal environment	CE-R8	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Rule CE-R8 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment	Amend Rule CE-R8 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF
Cavalli Properties Limited (S177)	S177.009	Coastal environment	CE-R8	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Rule CE-R8 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment.	Amend Rule CE-R8 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF
Kapiro Conservation Trust (S442)	S442.121	Coastal environment	CE-R8	Support in part	Support prohibition on any new mineral extraction activities in the coastal environment.	Retain CE-R8.
Royal Forest and Bird Protection Society of New Zealand (S511)	S511.102	Coastal environment	CE-R8	Support	Support prohibition on any new mineral extraction activities in the coastal environment	Retain CE-R8
Suzanne Linda Ashmore (S169)	S169.010	Coastal environment	CE-R9	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Rule CE-R9 is an unnecessary constraint on permitted development under the General	Amend Rule CE-R9 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF

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					Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment	
Cavalli Properties Limited (S177)	S177.010	Coastal environment	CE-R9	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Rule CE-R9 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment	Amend Rule CE-R9 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF
Kapiro Conservation Trust (S442)	S442.122	Coastal environment	CE-R9	Support	Support prohibition on land fills, managed fills and clean fills.	Retain CE-R9.
Royal Forest and Bird Protection Society of New Zealand (S511)	S511.103	Coastal environment	CE-R9	Support	Support prohibition on land fills, managed fills and clean fills	Retain CE-R9
Bayswater Inn Ltd (S29)	S29.008	Coastal environment	Standards	Oppose	Coastal Environment Overlay - With regard to the inclusion of 40 Marsden Road, Paihia, in the coastal environment overlay, the PDP has introduced new rules which have an impact on the subdivision status, along with the future development of the sites. The creation of lots in the coastal environment would in terms of subdivision be assessed as a Discretionary Activity, whereas it is currently a Controlled Activity. Some of the restrictions on future development are illogical and unreasonable	Amend the coastal environment rules to exempt existing/established urban areas (including 40 Marsden Road, Paihia) from the restrictions on future development including: <ul style="list-style-type: none"> • maximum floor area of 300 m² • maximum extension of 20% • limits on excavation and filling • maximum height of 5 metres • additional controls on indigenous vegetation removal

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						<ul style="list-style-type: none"> subdivision as a discretionary activity
Good Journey Limited (S82)	S82.012	Coastal environment	Standards	Oppose	<p>The standards of the Coastal Environment Overlay are not supported by appropriate analysis, do not meet the provisions of s.32 of the Act, and do not accord with Part II of the RMA 1991.</p> <p>The standards within the Coastal Environment overlay do not recognise different attributes and apply a generic set of rules that are unwarranted in an urban environment.</p> <p>The nett effect of the coastal environment overlay provisions is that all newly built form or extensions within an urban zoned area (which contains both residential and mixed use development zones) will trigger full discretionary resource consent for any development which exceeds one storey in height, exceeds the height of the nearest ridgeline, increases the floor area by more than 20%, is not finished in a BS5252 colour palette and has a reflectance value greater than 30%.</p>	Delete the requirements for resource consent for building additions exceeding 20% in GFA, buildings exceeding one storey in height, reference to specific colours and reflectivity limitations in urban areas.
Russell Protection Society (INC) (S179)	S179.071	Coastal environment	Standards	Support	<p>In view of the fact that coastal zones are not provided for in the Proposed district plan, then the Coastal Environment, Natural Character and Natural Features and Landscape Overlays become very important in helping to define the boundaries of Russell and in safeguarding a suitable backdrop or canvass which to interpret and appreciate the historic township.</p> <p>It is especially important that these overlays provide adequate protection to the headlands framing Russell and the natural coastal escarpments that characterize the balance of the Russell Peninsula. For this reason it is important to control subdivision and development of coastal lands in the area.</p>	Retain standards
The Paihia Property Owners	S330.004	Coastal environment	Standards	Support in part	The submitter supports in part standards in the Coastal Environment (inferred), however the PDP approach does not appropriately justify some provisions as no specific locality	Amend standards in the Coastal Environment (inferred) to promote more enabling and appropriate

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Group (S330)					assessments have been undertaken to suggest that they are appropriate in a highly modified urban environment such as Paihia.	provisions as they relate to urban areas such as Paihia.
Nicole Way and Christopher Huljich as Trustees of the Trssh Birnie Settlement Trust (S345)	S345.008	Coastal environment	Standards	Oppose	<p>The Resource Consents at Mataka Station enable development, and completion of the Mataka Station development, notwithstanding the provisions of the Proposed District Plan. The Proposed District Plan fails to recognise, have regard to, or provide for the development and subdivision enabled by the Resource Consents.</p> <p>The Proposed District Plan provisions will restrict development of the Property, and Mataka Station more generally, in a manner that is inconsistent with the Resource Consents and the integrated and comprehensive development authorised by those. The Council's s32 analysis does not mention, or consider approved but unimplemented developments within the Property and Mataka Station more generally, nor elsewhere. The "low intensity" development controls and height limits proposed within the Coastal Environment are given very little analysis.</p> <p>The proposed provisions are inconsistent with the Act and relevant planning instruments.</p>	<p>Amend to explicitly, and specifically provide for, and preserve the activities and land uses authorised under the Resource Consents at Mataka Station.</p> <p>and/or</p> <p>Insert a new special purpose zone and/or structure plan together with appropriate provisions (objectives, policies and rules) enabling the residential activity and development as is authorised by the Resource Consents as a permitted activity (where they are in general accordance with the Resource Consents) as well as appropriate activities within the Rural Production Zone, regardless of the provisions of the CE, ONL or HNC.</p> <p>and/or</p> <p>Amend the provisions of the Proposed District Plan to preserve the activities and buildings authorised by the Resource Consents on the Property.</p>
The Paihia Property Owners Group (S565)	S565.005	Coastal environment	Standards	Support in part	<p>The report provided by Melean Absolum Limited, that supports the Coastal Environment s32 Report prepared by Council, only suggests potential rules for the Coastal Environment within an urban area. There is no detailed evidence provided within either report to support these 'suggestions'. The PDP includes to rules such as a 5m height limit, 300m2 building / floor area coverage, and 400m2 indigenous vegetation and earthworks limits within an urban area. There is limited rationale as to why and how these provisions were selected. it is not</p>	<p>Amend the standards within the Coastal Environment to promote more enabling and appropriate provisions as they relate to urban areas such as Paihia.</p>

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					clear why 5m was selected, or why this height limit is appropriate. No specific locality assessments have been undertaken specifically to suggest that this is appropriate in a highly modified urban environment such as Paihia.	
Lynley Newport (S123)	S123.001	Coastal environment	CE-S1	Support in part	I would like see an increase from 5m to 6m. In the numerous applications I have prepared for buildings in outstanding landscapes and General Coastal Zone of the Operative District Plan I have come across many examples where the architect, in endeavouring to introduce some interesting angles and recesses and features that help mitigate the visual impact of the building, has slightly encroached a 5m height limit. Without increasing the risk of visual impact, I believe the standard can be relaxed to 6m. I also believe that the limitless and ill defined nature of the wording of the rest of CE-S1, items 1 & 2 could lead to over zealous interpretation of the standard and require consent when none should be required. For example what if the nearest 'ridgeline', headland or peninsula is on another property, or more than 1km away?	Amend CE-S1. 1: The maximum height of any new building or structure above ground level is 6m and must not exceed the height of the nearest ridgeline, headland or peninsula within or adjacent to the property. Similar wording change should be made to CE-S1. 2.
Bentzen Farm Limited (S167)	S167.079	Coastal environment	CE-S1	Oppose	The maximum height specified of 5m may or may not be appropriate in the circumstances, and is best assessed and determined at resource consent stage for the building. The requirement to not exceed the height of the nearest ridgeline, headland or peninsula as a height limit lacks precision and measurability, with these factors better taken into account at resource consent stage.	Delete Standard CE-S1
Setar Thirty Six Limited (S168)	S168.077	Coastal environment	CE-S1	Oppose	The maximum height specified of 5m may or may not be appropriate in the circumstances, and is best assessed and determined at resource consent stage for the building The height limit of the zone would otherwise apply to smaller (less than 50m ² structures). The requirement to not exceed the height of the nearest ridgeline, headland or peninsula as a height limit lacks precision and measurability,	Delete Standard CE-S1

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					with these factors better taken into account at resource consent stage	
Suzanne Linda Ashmore (S169)	S169.011	Coastal environment	CE-S1	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Standard CE-S1 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment	Amend Standard CE-S1 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF
Cavalli Properties Limited (S177)	S177.011	Coastal environment	CE-S1	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Standard CE-S1 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment.	Amend Standard CE-S1 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF.
Russell Protection Society (INC) (S179)	S179.080	Coastal environment	CE-S1	Support in part	for example the permitted height limit within the overlay is 5m (CE-S1) whereas the permitted height in the Kororareka Russell township zone is appropriately set at 7.2m (KRT-S1)	Amend Coastal Environment overlays within urban areas following an investigation of the challenges in applying
The Shooting Box Limited (S187)	S187.068	Coastal environment	CE-S1	Oppose	The maximum height specified of 5m may or may not be appropriate in the circumstances, and is best assessed and determined at resource consent stage or the building. The height limit of the zone would otherwise apply to smaller (less than 50m ² structures). The requirement to not exceed the height of the nearest ridgeline, headland or peninsula as a height limit lacks precision and measurability, with these factors better taken into account at resource consent stage.	Delete Standard CE-S1.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Paul Hayman (S210)	S210.001	Coastal environment	CE-S1	Oppose	The steep topography of submitters site at 277 Wainui Road means it isn't possible to build a house which could comply with this rule (5m maximum height) without huge excavations.	Amend the standard to the maximum height of the zone in which the property is located in.
Wendover Two Limited (S222)	S222.071	Coastal environment	CE-S1	Oppose	The maximum height specified of 5m may or may not be appropriate in the circumstances, and is best assessed and determined at resource consent stage for the building. The height limit of the zone would otherwise apply to smaller (less than 50m ² structures). The requirement to not exceed the height of the nearest ridgeline, headland or peninsula as a height limit lacks precision and measurability, with these factors better taken into account at resource consent stage.	Delete Standard CE-S1
Matauri Trustee Limited (S243)	S243.097	Coastal environment	CE-S1	Oppose	The maximum height specified of 5m may or may not be appropriate in the circumstances, and is best assessed and determined at resource consent stage for the building. The height limit of the zone would otherwise apply to smaller (less than 50m ² structures). The requirement to not exceed the height of the nearest ridgeline, headland or peninsula as a height limit lacks precision and measurability, with these factors better taken into account at resource consent stage.	Delete Standard CE-S1
Richard G A Palmer (S248)	S248.004	Coastal environment	CE-S1	Support in part	CE-S1 makes no real allowance for buildings built on sloping land. 5m is simply too low where a single level house will not comply	amend CE-S1 to increase the maximum height of nay new building or strucutre above ground level to 8m
Willowridge Developments Limited (S250)	S250.018	Coastal environment	CE-S1	Oppose	The narrow approach for the management of height in the CE is considered to inadequately provide for the variable values of existing environments and underlying zones. Fails to take into account areas that are zoned either mixed use or industrial where height limits are set at 12m, with many existing buildings that already exceed this proposed limit. The 5m height limit is considered inappropriate in these environments.	Review the height limits proposed in CE-S1 and provide tailored height limits for each zone.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
New Zealand Maritime Parks Ltd (S251)	S251.008	Coastal environment	CE-S1	Oppose	NZMPL consider that the maximum 5m building height standard inadequately acknowledges the heights of existing buildings established in urban areas. For instance, many buildings already established within the Opuia industrial park exceed 5m in height and have a functional and operational need to do so, i.e., marine services that accommodate large boats and equipment	Amend the height limits proposed in Standard CE-S1 and provide tailored height limits for each zone.
IDF Developments Limited (S253)	S253.006	Coastal environment	CE-S1	Oppose	The 5.0m height limit will restrict building design and layout options. This should be increased to 6.0m. The reference to the nearest ridgeline, headland or peninsula is void for certainty and should be removed. There is too much ambiguity with this wording and should be removed	Delete the maximum height of 5.0m and the reference to " <i>the nearest ridgeline, headland or peninsula</i> " (inferred)
Josh Henwood (S256)	S256.003	Coastal environment	CE-S1	Oppose	The permitted height under the Mixed Use area is 8.5 metres. The 5m proposed height under the Coastal Environment zone allows for only 1 level. On steep sites, this is not practical, and much of Paihia is on steep sites.	Amend standard to align with Mixed Use Zone maximum height of 8.5 metres.
Waitoto Development Limited (S263)	S263.035	Coastal environment	CE-S1	Oppose	The submitter considers that standard CE-S1 should not apply to the Orongo Bay Special Purpose Zone which should be exempt from this standard.	Delete standard CE-S1 as it applies to the Orongo Bay Special Purpose Zone.
Trent Simpkin (S283)	S283.001	Coastal environment	CE-S1	Oppose	A maximum height of 5m for any standard house or building is very difficult to achieve. No zone in the old District Plan had a max height of under 8 metres. To add to this, most of the coastal land in the Far North is sloping, and we are now forced by the definition of 'Height' to only use Rolling Height as a method (average height method has been removed) so therefore nearly all new homes will breach this maximum height rule. It is not possible to building a house on a sloping site without breaching 5m maximum height, which will mean hundreds of resource consents for FNDC to process.	Amend maximum height to 8m as per the old District Plan.
Leisa Henwood (S285)	S285.001	Coastal environment	CE-S1	Oppose	The permitted height in the Mixed Use zone is 10m. A 5m maximum height is not practicable as many sites in Paihia are steep and a 5m height would not even allow a 2 storey dwelling.	Amend standard CE-S1 to make the permitted mixed use height 10m.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Tristan Simpkin (S287)	S287.003	Coastal environment	CE-S1	Oppose	<p>A maximum height of 5m for any standard house or building is very difficult to achieve. To add to this, most of the coastal land in the Far North is sloping, and we are now forced by the definition of 'Height' to only use Rolling Height as a method (average height method has been removed) so therefore nearly all new homes will breach this maximum height rule. No zone in the old DP had a max height of under 8m. It is not possible to build a house on a sloping site without breaching a 5m maximum height, which will mean hundreds of additional needless resource consents for FNDC to process.</p> <p>For example:, assume a flat building site, FFL will be around 700mm for a timber floor, Stud Height 2550 or 2700, Truss Height approx 2000 = over 5m already for a very standard home. Add a sloping site to this scenario and all of a sudden the breach is large.</p>	Amend maximum height to 8 metres (as per the Operative District Plan).
Terry Henwood (S289)	S289.001	Coastal environment	CE-S1	Oppose	<p>The permitted height in the Mixed Use zone is 10m. A 5m maximum height is not practicable as many sites in Paihia are steep and a 5m height would not even allow a 2 storey dwelling. A 5m height does not allow scope for new motels in Paihia. Zone A1 does not affect any rear neighbours as to height.</p>	Amend standard CE-S1 to make the permitted mixed use height 10m.
Bruce and Kim Rogers (S293)	S293.003	Coastal environment	CE-S1	Oppose	<p>This standard is prohibitive and the permitted standard in the MUZ in area B in 10m. A 5m height for a two-story building with 2.4m high floors is not practicable.</p>	Amend CE-S1 to reflect the permitted Mixed Use Standard MUZ-S1 in Area B of 10m maximum height.
Bruce and Kim Rogers (S294)	S294.005	Coastal environment	CE-S1	Oppose	<p>The permitted standard in the Mixed Use Zone in Area A (Paihia) is 8.5m and a 5m maximum height for a two-storey building within 2.4m high floors is not practicable.</p>	Amend standard CE-S1 to reflect the permitted Mixed Use standard in Area A of Paihia which is 8.5m.
Chris Sharp (S313)	S313.001	Coastal environment	CE-S1	Support	<p>Doves Bay is a well-established built environment, that includes few undeveloped sites. A fair proportion of dwellings are built to the maximum heights currently permitted. Many are located on the ridgeline, highly visible from a wide visual catchment. For this reason, the restrictions on development are unreasonable</p>	Delete the rule or establish more appropriate thresholds that are more fitting with development, i.e do not apply a blanket approach to properties in the coastal environment.

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					and will not mitigate any effects that are not already existing.	
Far North Holdings Limited (S320)	S320.010	Coastal environment	CE-S1	Not Stated	The submitter considers that the insertion of additional sub-clauses into standard CE-S1 Maximum height, is appropriate and necessary relief to achieve the aims of this submission (s32 assessment provided with submission).	<p>Insert the following into standard CE-S1 Maximum height, as follows:</p> <ol style="list-style-type: none"> 1. The maximum height of any new building or structure above ground level is 5m and must not exceed the height of the nearest ridgeline, headland or peninsula. 2. Any extension to a building or structure must not exceed the height of the existing building above ground level or exceed the height of the nearest ridgeline, headland or peninsula. <p>This standard does not apply to:</p> <ol style="list-style-type: none"> i. The Orongo Bay zone ii. the OMDA, the Mixed Use Zone at the Opuā Marina, where the maximum height limit is 16m. iii. Marine Business Park, Commercial Estate, and Colenso Triangle where the maximum height limit is 12m.
P S Yates Family Trust (S333)	S333.069	Coastal environment	CE-S1	Oppose	The maximum height specified of 5m may or may not be appropriate in the circumstances, and is best assessed and determined at resource consent stage for the building. The height limit of the zone would otherwise apply to smaller (less than 50m ² structures). The requirement to not exceed the height of the	Delete Standard CE-S1

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					nearest ridgeline, headland or peninsula as a height limit lacks precision and measurability, with these factors better taken into account at resource consent stage.	
Ed and Inge Amsler (S341)	S341.012	Coastal environment	CE-S1	Oppose	A 5m height limit imposed by the standard seems to be at odds with the residential / commercial intent of the MUZ. For example, a 5m height limit does not provide genuine bottom floor commercial and above ground residential uses. It is likely that residential activities will not be favourable in this zone, although should be supported with more enabling height provisions in the Coastal Environment.	Amend the 5m height limit to be increased in urban areas to a more appropriate limit, particularly where the Mixed Use Zone is present in CE-S1.
Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd (S344)	S344.014	Coastal environment	CE-S1	Not Stated	It is considered that this standard places unnecessarily restrictive rules upon urban areas such as Paihia within the CE where amenity and character has already been compromised	Amend CE-S1 to exclude land zoned MUZ, RSZ and LIZ or any equivalent commercial zone, to enable development to occur in accordance with the underlying zone provisions.
Chris Sharp (S350)	S350.001	Coastal environment	CE-S1	Oppose	Do not apply a blanket approach to properties in the coastal environment. Opito Bay is a well established built environment with no undeveloped sites. A number of dwellings are built to the maximum height currently permitted. Many are located on ridgelines and beach frontage, highly visible from a wide visual catchment. For this reason the proposed restrictions are unreasonable and will not mitigate any effects that are not already existing.	Delete rule CE-S1 or amend to establish thresholds that are more fitting with the development.
Far North District Council (S368)	S368.003	Coastal environment	CE-S1	Support in part	This standard affects a number of built up urban areas across the district. Further investigation is required to determine whether urban zones should be excluded from this standard, given the sliding scale of 'natural character' from urban to	Delete urban zones from this standard, if further investigation shows that it is appropriate in the Coastal Environment.

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					rural and the already built up nature of existing 'urban' areas.	
Sarah Ballantyne and Dean Agnew (S386)	S386.014	Coastal environment	CE-S1	Oppose	Ballantyne & Agnew's consider that the built form of urban zones is part of the established values of these environments. It is considered that these height limits in urban zones have not been thoroughly assessed, and reliance on the underlying zone thresholds will sufficiently manage the effects. Further, Ballantyne & Agnew consider the wording in clause (1) refers to the 'nearest ridgeline, headland or peninsula' needs to be reconsidered. These terms are not defined, and may cause interpretation issues of how and when these apply to a particular relevant. Particularly in locations where there are multiple ridgelines and headlands, Russell township is a perfect example of this with two headlands that encompass the bay and various ridgelines that define the town. Ridgeline, headland and peninsula are not defined terms and are somewhat subjective terms to include within rule criteria for the purpose of determining whether consent is required or not. It is also unclear as to whether the rule is intending to protect the skyline within the CE or act as a generic visual amenity consent trigger. If the former, we consider the rule could be reworded to make reference to the "height of the tallest/highest surrounding ridgeline, headland or peninsula".	Delete CE-S1 Or Amend CE-S1 to make reference to the "height of the tallest/highest surrounding ridgeline, headland or peninsula". And Insert definitions of ridgeline, headland and peninsula.
John Andrew Riddell (S431)	S431.043	Coastal environment	CE-S1	Not Stated	Not stated	Amend standard CE-S1 so that it does not apply to any urban zone as well as not applying to the Orongo Bay zone.
Waiaua Bay Farm Limited (S463)	S463.065	Coastal environment	CE-S1	Oppose	The imposition of a generic 5m permitted height limit over all land in the coastal environment is a very notable change introduced by the Proposed Plan. This is likely to heavily constrain some landowners' ability to use and develop land in accordance with its zoned purpose.	Amend the exclusions within Standard CE-S1 to also exclude Special Purpose Zone - Kauri Cliffs

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					<p>This highly conservative and all encompassing proposed rule is not mandated by any provisions of the Regional Policy Statement for Northland, the Proposed Regional Plan for Northland August 2022 - Appeals Version, nor by the New Zealand Coastal Policy Statement.</p> <p>The planning issues created by the introduction of a resource consent requirement for buildings taller than 5m are apparent when considering the Special Purposes Zones. Such zones are, according to the Kauri Cliffs s32 report:</p> <p>"...locations where detailed site assessment and development have been completed by way of a resource consent, development plan, structure plan or master plan to result in outcomes for the area, managed by way of area specific objectives, policies and methods. Each Special Area is unique, with individual circumstances, site constraints, surrounding environment, resource management issues and development potential".</p> <p>Given the foregoing, the Special Purposes Zones anticipate, and provide individualised planning frameworks for, unique developments. Introducing a 5 m permitted height limit as proposed by this rule contradicts the bespoke development outcomes that have previously been considered and embedded in the Special Purpose Zones, in Kauri Cliffs case since the commencement of the Operative Plan in 2009.</p>	
David Truscott (S476)	S476.004	Coastal environment	CE-S1	Oppose	The coastal environment height limit of 5 metres conflicts with the adopted Rawene Design Guidelines where 2 storey buildings are recommended. RPS objective 3.14 does not set absolute protection in all cases and can accommodate a degree of modification. This flexibility should apply in Rawene.	Amend policy CE-S1 to increase permitted building heights from 5m to 8m in the Rawene HHA Part A.
William Goodfellow (S493)	S493.011	Coastal environment	CE-S1	Oppose	The submitter also considers that the activity status and standards imposed on activities within the coastal environment are unnecessarily onerous. These include imitations on setback for	Amend provisions within the plan that impose limitations on the height of new buildings located within the coastal environment overlay be

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					buildings from MHWS, and limitations over the area, height, colour and reflectivity of buildings.	deleted.
Ian Jepson (S494)	S494.011	Coastal environment	CE-S1	Oppose	Further, the submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include the identification of farming and forestry as discretionary activities, and imitations on the height, colour and reflectivity of buildings.	Amend provisions within the plan that impose limitations on the height of new buildings located within the coastal environment overlay be deleted.
Ricky Faesen Kloet (S495)	S495.007	Coastal environment	CE-S1	Oppose	The submitter considers that the proposed standards that apply to activities located within the coastal environment overlay would limit the reasonable development of land to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act. These include limitations on the height and colour of buildings.	Delete CE-S1 (inferred).
Philip Thornton (S496)	S496.009	Coastal environment	CE-S1	Oppose	The submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include imitations on the height, colour and reflectivity of buildings.	Amend provisions within the plan that impose limitations on the height of new buildings located within the coastal environment overlay be deleted.
Mark John Wyborn (S497)	S497.009	Coastal environment	CE-S1	Support in part	The imposition of controls intended to manage development make the reasonable use and development of the property unfairly and unnecessarily constrained (inferred).	Amend provisions within the plan that impose limitations on the height of new buildings located within the coastal environment overlay be deleted.
Northland Planning and Development 2020 Limited (S502)	S502.018	Coastal environment	CE-S1	Support in part	Amendment to the permitted height allowance is requested. Within the underlying Operative zone rules, the minimum permitted height is 8 metres, with the exception of the rural production zone which allows for 12 metres. The coastal zone covers a large area of rural zoned land which has a functional need to establish sheds for machinery and general farm buildings which would easily exceed the 5m threshold. Enabling an 8m height restriction ensures most farm buildings are able to comply with the standard. The additional requirement to not exceed the height of the nearest ridgeline, headland or peninsula provides additional mitigation in comparison to the existing rule set.	Amend point 1 of Standard CE-S1 as follows: <ul style="list-style-type: none"> 1. The maximum height of any new building or structure above ground level is 58m and must not exceed the height of the nearest ridgeline, headland or peninsula. <p>In the event that an 8m height restriction is not accepted we seek further relief that a 6m height</p>

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					We do note that the Melean Landscape Assessment does discuss a 5m height restriction as being acceptable. However, this report provides little justification as to why a 5m height restriction has been utilised. We do note that generally many single-story houses which are constructed exceed a 5m height restriction.	restriction be accepted as generally most single story houses would fit within this height restriction. In the event the above relief is not accepted, we seek that the changes apply insofar as the Waitangi Estate.
Waitangi Limited (S503)	S503.016	Coastal environment	CE-S1	Not Stated	Amendment to the permitted height allowance is requested. Within the underlying Operative zone rules, the minimum permitted height is 8 metres, with the exception of the rural production zone which allows for 12 metres. The coastal zone covers a large area of rural zoned land which has a functional need to establish sheds for machinery and general farm buildings which would easily exceed the 5m threshold. Enabling an 8m height restriction ensures most farm buildings are able to comply with the standard. The additional requirement to not exceed the height of the nearest ridgeline, headland or peninsula provides additional mitigation in comparison to the existing rule set. We do note that the Melean Landscape Assessment does discuss a 5m height restriction as being acceptable. However, this report provides little justification as to why a 5m height restriction has been utilised. We do note that generally many single-story houses which are constructed exceed a 5m height restriction.	Amend point 1 of Standard CE-S1 as follows: <ul style="list-style-type: none"> 1. The maximum height of any new building or structure above ground level is 58m and must not exceed the height of the nearest ridgeline, headland or peninsula. In the event that an 8m height restriction is not accepted we seek further relief that a 6m height restriction be accepted as generally most single story houses would fit within this height restriction. In the event the above relief is not accepted, we seek that the changes apply insofar as the Waitangi Estate.
Vaughan Norton-Taylor (S536)	S536.008	Coastal environment	CE-S1	Oppose	Limiting the maximum height of any new building or structure above ground level to 5m has total disregard to development options and desecration of land values. No logic or reason are given for this change.	Delete Standard CE-S1 and retain status quo (inferred)
Bentzen Farm Limited (S167)	S167.080	Coastal environment	CE-S2	Support in part	The rule should allow for natural materials also which typically sit well in the coastal environment.	Amend Standard CE-S2 as follows: The exterior surfaces of buildings or structures shall: <ul style="list-style-type: none"> 1. be constructed of materials

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						and/or finished to achieve a reflectance value no greater than 30%. 2. have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette or are a natural finish stone or timber.
Setar Thirty Six Limited (S168)	S168.078	Coastal environment	CE-S2	Support in part	The rule should allow for natural materials also which typically sit well in the coastal environment.	Amend Standard CE-S2 as follows: The exterior surfaces of buildings or structures shall: 1. be constructed of materials and/or finished to achieve a reflectance value no greater than 30%. 2. have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette or are a natural finish stone or timber.
Suzanne Linda Ashmore (S169)	S169.012	Coastal environment	CE-S2	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Standard CE-S2 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment	Amend Standard CE-S2 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF
Cavalli Properties Limited (S177)	S177.012	Coastal environment	CE-S2	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Standard CE-S2 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the	Amend Standard CE-S2 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF

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					Northland Regional Policy Statement provisions for the Coastal Environment	
The Shooting Box Limited (S187)	S187.069	Coastal environment	CE-S2	Support in part	The rule should allow for natural materials also which typically sit well in the coastal environment.	Amend Standard CE-S2 as follows: The exterior surfaces of buildings or structures shall: 1. be constructed of materials and/or finished to achieve a reflectance value no greater than 30%. 2. have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette or are a natural finish stone or timber.
Wendover Two Limited (S222)	S222.072	Coastal environment	CE-S2	Support in part	The rule should allow for natural materials also which typically sit well in the coastal environment.	Amend Standard CE-S2 as follows: The exterior surfaces of buildings or structures shall: 1. be constructed of materials and/or finished to achieve a reflectance value no greater than 30%. 2. have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette or are a natural finish stone or timber.
Matauri Trustee Limited (S243)	S243.098	Coastal environment	CE-S2	Support in part	The rule should allow for natural materials also which typically sit well in the coastal environment.	Amend Standard CE-S2 as follows: The exterior surfaces of buildings or structures shall: 1. be constructed of materials and/or finished to achieve a reflectance value no greater than 30%. 2. have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette or are a natural finish stone or

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						timber.
Nicole Wooster (S259)	S259.013	Coastal environment	CE-S2	Support in part	Bridges over coastal areas, boat ramps and wharfs would be regulated by this standard. Clause 2 is impracticable as we do not paint our wharf. Further graves and associated headstones may also be inadvertently captured by this rule and not comply.	Amend to practically regulate graves, bridges, wharfs and boat ramps or provide for their natural finish.
Waitoto Development Limited (S263)	S263.036	Coastal environment	CE-S2	Oppose	The submitter considers that standard CE-S2 should not apply to the Orongo Bay Special Purpose Zone which should be exempt from this standard.	Delete standard CE-S2 as it applies to the Orongo Bay Special Purpose Zone.
Trent Simpkin (S283)	S283.002	Coastal environment	CE-S2	Support in part	There is no allowance for timber i.e. cedar/larch, or concrete, steel, aluminium finishes. Referencing the BS5252 colour palette means that the color has to be painted, whereas it is beneficial in many coastal areas to use natural products like timber cladding with stained finishes.	Amend standard to read ' if the exterior surface is painted , it must have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette'
Tristan Simpkin (S287)	S287.002	Coastal environment	CE-S2	Support in part	There is no allowance for timber i.e. cedar/larch, or concrete, steel, aluminium finishes. Referencing the BS5252 colour palette means that the color has to be painted, whereas it is beneficial in many coastal areas to use natural products like timber cladding with stained finishes.	Amend the standard to read: ' if the exterior surface is painted, it must have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette'
P S Yates Family Trust (S333)	S333.070	Coastal environment	CE-S2	Support in part	The rule should allow for natural materials also which typically sit well in the coastal environment.	Amend Standard CE-S2 as follows: The exterior surfaces of buildings or structures shall: 1. be constructed of materials and/or finished to achieve a reflectance value no greater than 30%. 2. have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette or are a natural finish stone or timber.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd (S344)	S344.015	Coastal environment	CE-S2	Not Stated	It is considered that this standard places unnecessarily restrictive rules upon urban areas such as Paihia within the CE where amenity and character has already been compromised	Amend CE-S2 to exclude land zoned MUZ, RSZ and LIZ or any equivalent commercial zone, to enable development to occur in accordance with the underlying zone provisions.
Woolworths New Zealand Limited (S458)	S458.004	Coastal environment	CE-S2	Support in part	Under CE-S2, paint colour and reflectivity is specified. Countdown's 'pawpaw green' colour has a light reflective value of 12%, but given this is a custom colour it is not located within this generic Resene colour palette and therefore any repainting of the existing store or additions to the store would require resource consent as a Discretionary Activity. This is considered unnecessary for a paint colour that is used and accepted nationwide with no known visual effects, and maintains a low light reflectivity which is understood to be the intent of such rule.	Amend Rule CE-S2 where it restricts the exterior colours of buildings. This should only restrict the reflectivity value and not specify a pre-approved colour palette.
William Goodfellow (S493)	S493.012	Coastal environment	CE-S2	Oppose	The submitter also considers that the activity status and standards imposed on activities within the coastal environment are unnecessarily onerous. These include imitations on setback for buildings from MHWS, and limitations over the area, height, colour and reflectivity of buildings.	Amend provisions within the plan that impose limitations on the exterior finishes of new buildings located within the coastal environment overlay be deleted.
Ian Jepson (S494)	S494.012	Coastal environment	CE-S2	Oppose	The submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include imitations on the height, colour and reflectivity of buildings.	Amend provisions within the plan that impose limitations on the exterior finishes of new buildings located within the coastal environment overlay be deleted.
Ricky Faesen Kloet (S495)	S495.008	Coastal environment	CE-S2	Oppose	The submitter considers that the proposed standards that apply to activities located within the coastal environment overlay would limit the reasonable development of land to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act. These include limitations on the height and colour of buildings.	Delete CE-S2 (inferred).

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Philip Thornton (S496)	S496.010	Coastal environment	CE-S2	Oppose	The submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include imitations on the height, colour and reflectivity of buildings.	Amend provisions within the plan that impose limitations on the exterior finishes of new buildings located within the coastal environment overlay be deleted.
Mark John Wyborn (S497)	S497.010	Coastal environment	CE-S2	Support in part	The imposition of controls intended to manage development make the reasonable use and development of the property unfairly and unnecessarily constrained (inferred).	Amend provisions within the plan that impose limitations on the exterior finishes of new buildings located within the coastal environment overlay be deleted.
Northland Planning and Development 2020 Limited (S502)	S502.019	Coastal environment	CE-S2	Support in part	Reference to the BS5252 standard colour range has been removed. Many coloursteel colours, which have an LRV of less than 30% are not listed within the BS5252 standard colour palette. This results in consent being required for a large number of sheds/garages, dwelling roofs, which are constructed of coloursteel materials and have an LRV of less than 30%, but are not stated within the BS5252 standard colour palette range. The Resene BS5252 colour range was created in 2008 and is therefore very outdated. It also gives an unfair trade advantage to Resene where only their products can be utilised. It is considered that with the requirement of an LRV no greater than 30%, the intention of this rule will still be achieved, and will remove the need for consent for coloursteel products which have an LRV of less than 30% (as well as any other products which have the same issue). Furthermore, by deleting point 2, it enables natural wood products such as cedar to be utilised which are not painted or stained without requiring consent.	Amend CE-S2 The exterior surfaces of buildings or structures shall: 1. be constructed of materials and/or finished to achieve a light reflectance value no greater than 30%. 2. have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette or if not accepted 2. If painted have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette or equivalent product
Waitangi Limited (S503)	S503.017	Coastal environment	CE-S2	Not Stated	Reference to the BS5252 standard colour range has been removed. Many coloursteel colours, which have an LRV of less than 30% are not listed within the BS5252 standard colour palette. This results in consent being required for a large number of sheds/garages, dwelling roofs, which are constructed of coloursteel materials and	Amend Standard CE-S2 as follows: The exterior surfaces of buildings or structures shall: 1. be constructed of materials and/or finished to achieve

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					<p>have an LRV of less than 30%, but are not stated within the BS5252 standard colour palette range. The Resene BS5252 colour range was created in 2008 and is therefore very outdated. It also gives an unfair trade advantage to Resene where only their products can be utilised. It is considered that with the requirement of an LRV no greater than 30%, the intention of this rule will still be achieved, and will remove the need for consent for coloursteel products which have an LRV of less than 30% (as well as any other products which have the same issue). Furthermore, by deleting point 2, it enables natural wood products such as cedar to be utilised which are not painted or stained without requiring consent.</p>	<p>a light reflectance value no greater than 30%.</p> <p>2. have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette.</p> <p>In the event this relief is not accepted we ask that Council make the following changes to point 2:If painted have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette or equivalent product</p>
<p>Lynley Newport (S122)</p>	<p>S122.002</p>	<p>Coastal environment</p>	<p>CE-S3</p>	<p>Support in part</p>	<p>Rule IB-R1 permits certain indigenous vegetation clearance in "All Zones", including up to 1,000m2 clearance to provide for a single residential unit, on-site services and its access, and to create or maintain a setback between a vulnerable building and vegetation. I have supported both these permitted activity clearance provisions, albeit it submitted that 1,000m2 is insufficient for dwelling, on-site servicing and access.</p> <p>No reference back to IB-R1 is included in CE-R3, PER-1. Given the clear intent of IB-R1, which is to recognise there are certain instances where limited indigenous vegetation clearance should be permitted, there should be a reference to this permitted activity in CE-R3, PER-1. CE-S3 is too restrictive overall. To make any indigenous clearance in an outstanding natural</p>	<p>Amend CE-S3 to read: Any earthworks or indigenous vegetation clearancemust (where relevant):</p> <ol style="list-style-type: none"> 1. Not exceed a total area of 50m2 for 10 years from the notification of the DistrictPlan in an area of outstanding natural character. 2. Not exceeda total area of 100m2 for 10 years from the notification of the District Plan in anarea of high natural character. 3. Not exceed a total area of 500m2 for 10 years from the notification of the District Plan in an area outside high or outstandingnatural character areas.

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					<p>character area in the coastal environment a non complying activity is overly limiting and in conflict with objectives and policies in the Natural Hazards chapter regarding wildfire. Also to make any cut/fill face of more than a 1m height a non complying activity is ridiculously restrictive. I suggest a bit of re-set for CE-R3, PER-1, PER-2 and S3.</p>	<p>Not exceed a cut height or fill depth of 1.5m and screen any exposed faces.</p>
<p>Bentzen Farm Limited (S167)</p>	<p>S167.081</p>	<p>Coastal environment</p>	<p>CE-S3</p>	<p>Oppose</p>	<p>Amendments are sought to the rule so that earthworks or indigenous vegetation clearance associated with access and/or a building platform are not subject to the preceding subclause 1-3s. As drafted, it could be interpreted that only earthworks and vegetation clearance for the purpose of access and/or a building platform are permitted. Life of District Plan as a compliance measure is unnecessarily limited and does not recognise the ability for the land to heal each season (ie calendar year) after earthworks. Screening should only be from public places (which includes the CMA) for the rule to efficiently apply.</p>	<p>Amend Standard CE-S2 (CE-S3 inferred) as follows: Any earthworks or indigenous vegetation clearance must (where relevant):</p> <ol style="list-style-type: none"> 1. not occur in outstanding natural character areas. 2. not exceed a total area of 50m² for 10 years from the notification of the District Plan per calendar year in an area of high natural character. 3. not exceed a total area of 400m² for 10 years from the notification of the District Plan per calendar year in an area outside high or outstanding natural character areas. 4. not exceed a cut height or fill depth of 1m 1.5m. 5. screen any exposed faces visible from a public place; or 6. be for the purpose of access and/or a building platform. <p>Note: The NESF requires a 10m setback from any natural wetland in respect of</p>

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						earthworks or vegetation clearance and may require consent from the Regional Council.
Setar Thirty Six Limited (S168)	S168.079	Coastal environment	CE-S3	Oppose	<p>Amendments are sought to the rule so that earthworks or indigenous vegetation clearance associated with access and/or a building platform are not subject to the preceding subclause 1-3s. Otherwise, such works would trigger the need for consent in almost every instance (building platforms generally being greater than 50m²).</p> <p>Also, as drafted, it could be interpreted that only earthworks and vegetation clearance for the purpose of access and/or a building platform are permitted (eg not farming earthworks and vegetation clearance).</p> <p>These changes are appropriate because earthworks or indigenous vegetation clearance associated with the building is assessed as a restricted discretionary activity matter with the building resource consent application.</p> <p>Life of District Plan as a compliance measure is unnecessarily limited and does not recognise the ability for the land to heal each season (ie calendar year) after earthworks.</p> <p>Screening should only be from public places (which includes the CMA) for the rule to efficiently apply</p>	<p>Amend Standard CE-S3 (inferred) as follows: Any earthworks or indigenous vegetation clearance must (where relevant):</p> <ol style="list-style-type: none"> 1. not occur in outstanding natural character areas. 2. not exceed a total area of 50m² for 10 years from the notification of the District Plan per calendar year in an area of high natural character. 3. not exceed a total area of 400m² for 10 years from the notification of the District Plan per calendar year in an area outside high or outstanding natural character areas. 4. not exceed a cut height or fill depth of 1m 1.5m. 5. screen any exposed faces visible from a public place; or 6. be for the purpose of access and/or a building platform. <p>Note: The NESF requires a 10m setback from any natural wetland in respect of earthworks or vegetation clearance and may require</p>

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						consent from the Regional Council.
Suzanne Linda Ashmore (S169)	S169.013	Coastal environment	CE-S3	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Standard CE-S3 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment	Amend Standard CE-S3 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF
Cavalli Properties Limited (S177)	S177.013	Coastal environment	CE-S3	Oppose	Where there is no ONC, ONL or ONF within the Coastal Environment Overlay, there is no requirement to restrict development to any extent greater than provided for by the rules of the underlying zone. Standard CE-S3 is an unnecessary constraint on permitted development under the General Residential zone and is inconsistent with the Northland Regional Policy Statement provisions for the Coastal Environment.	Amend Standard CE-S3 so that it does not apply to land within the Coastal Environment overlay where such land is not within an ONC, ONL or ONF.
The Shooting Box Limited (S187)	S187.070	Coastal environment	CE-S3	Oppose	Refer to submission for detailed reasons for decision(s) requested relating, but not limited to, to the following: earthworks and indigenous vegetation clearance would trigger the need for consent in almost every instance (building platforms generally being greater than 50m ²); it could be interpreted that only earthworks and vegetation clearance for the purpose of access and/or a building platform are permitted; life of district plan as a compliance measure is unnecessarily limited and does not recognise the ability for the land to heal each season; and screening should only be from public places.	Amend Standard CE-S2 (CE-S3 inferred) as follows: Any earthworks or indigenous vegetation clearance must (where relevant): 1. not occur in outstanding natural character areas. 2. not exceed a total area of 50m ² for 10 years from the notification of the District Plan per calendar year in an area of high natural character. 3. not exceed a total area of 400m ² for 10 years from the notification of the District Plan per calendar year in an area

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						<p>outside high or outstanding natural character areas.</p> <p>4. not exceed a cut height or fill depth of 1m 1.5m.</p> <p>5. screen any exposed faces visible from a public place; or</p> <p>6. be for the purpose of access and/or a building platform.</p> <p>Note: The NESF requires a 10m setback from any natural wetland in respect of earthworks or vegetation clearance and may require consent from the Regional Council.</p>
<p>Wendover Two Limited (S222)</p>	<p>S222.073</p>	<p>Coastal environment</p>	<p>CE-S3</p>	<p>Oppose</p>	<p>Amendments are sought to the rule so that earthworks or indigenous vegetation clearance associated with access and/or a building platform are not subject to the preceding subclause 1-3s. Otherwise, such works would trigger the need for consent in almost every instance (building platforms generally being greater than 50m²).</p> <p>Also, as drafted, it could be interpreted that only earthworks and vegetation clearance for the purpose of access and/or a building platform are permitted (eg not farming earthworks and vegetation clearance). These changes are appropriate because earthworks or indigenous vegetation clearance associated with the building is assessed as a restricted discretionary activity matter with the building resource consent application.</p> <p>Life of District Plan as a compliance measure is unnecessarily limited and does not recognise the ability for the land to heal each season (ie calendar year) after earthworks.</p>	<p>Amend Standard CE-S3 as follows:</p> <p>Any earthworks or indigenous vegetation clearance must (where relevant):</p> <ol style="list-style-type: none"> 1. not occur in outstanding natural character areas. 2. not exceed a total area of 50m² for 10 years from the notification of the District Plan per calendar year in an area of high natural character. 3. not exceed a total area of 400m² for 10 years from the notification of the District Plan per calendar year in an area outside high or outstanding natural character areas. 4. not exceed a cut height or fill

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					Screening should only be from public places (which includes the CMA) for the rule to efficiently apply.	depth of 1m 1.5m . 5. screen any exposed faces visible from a public place.; or 6. be for the purpose of access and/or a building platform. Note: The NESF requires a 10m setback from any natural wetland in respect of earthworks or vegetation clearance and may require consent from the Regional Council.
Matauri Trustee Limited (S243)	S243.099	Coastal environment	CE-S3	Oppose	Amendments are sought to the rule so that earthworks or indigenous vegetation clearance associated with access and/or a building platform are not subject to the preceding subclause 1-3s. Otherwise, such works would trigger the need for consent in almost every instance (building platforms generally being greater than 50m ²). Also, as drafted, it could be interpreted that only earthworks and vegetation clearance for the purpose of access and/or a building platform are permitted (e.g. not farming earthworks and vegetation clearance). These changes are appropriate because earthworks or indigenous vegetation clearance associated with the building is assessed as a restricted discretionary activity matter with the building resource consent application. Life of District Plan as a compliance measure is unnecessarily limited and does not recognise the ability for the land to heal each season (i.e. calendar year) after earthworks. Screening should only be from public places	Amend Standard CE-S2 (CE-S3 inferred) as follows: Any earthworks or indigenous vegetation clearance must (where relevant): 1. not occur in outstanding natural character areas. 2. not exceed a total area of 50m ² for 10 years from the notification of the District Plan per calendar year in an area of high natural character. 3. not exceed a total area of 400m ² for 10 years from the notification of the District Plan per calendar year in an area outside high or outstanding natural character areas. 4. not exceed a cut height or fill depth of 1m 1.5m .

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					(which includes the CMA) for the rule to efficiently apply	5. screen any exposed faces visible from a public place; or 6. be for the purpose of access and/or a building platform. Note: The NESF requires a 10m setback from any natural wetland in respect of earthworks or vegetation clearance and may require consent from the Regional Council.
IDF Developments Limited (S253)	S253.007	Coastal environment	CE-S3	Oppose	The proposed provisions work against the enabling intent of the Rural Productive Zone. Earthworks and vegetation clearance go hand in hand with a productive farming environment. The provisions are too restrictive, and it is unclear how Council will actively monitor the earthworks component of the provision, particularly in relation to a 10 year threshold and a 1m cut for standard rural activities. In that sense, the provisions are unlikely to achieve any value or link to the objectives proposed	Delete the 400m ² limitation on earthworks and indigenous vegetation clearance in the Coastal Environment and the 1m cut or fill depth limitation (inferred)
Nicole Wooster (S259)	S259.011	Coastal environment	CE-S3	Support in part	A family cemetery is located in the coastal environment. It is unclear if earthworks associated with a cemetery would be permitted. The rules do not provide for it as an activity and it would breach these standards due to the depth and area over a course of 10 years. However, Council may consider that this would be covered by existing use rights for a lawfully established cemetery.	Amend Standard CE-S3 to ensure operations of an existing cemetery are provided for in the rules or have Council confirm that this is not required as it is covered by existing use rights.
Waitoto Development Limited (S263)	S263.037	Coastal environment	CE-S3	Oppose	The submitter considers that standard CE-S3 should not apply to the Orongo Bay Special Purpose Zone which should be exempt from this standard.	Delete standard CE-S3 as it applies to the Orongo Bay Special Purpose Zone.
P S Yates Family	S333.071	Coastal environment	CE-S3	Oppose	Amendments are sought to the rule so that earthworks or indigenous vegetation clearance associated with access and/or a building	Amend Standard CE-S2 (CE-S3 inferred) as follows: <i>Any</i>

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Trust (S333)					<p>platform are not subject to the preceding subclause 1-3s. Otherwise, such works would trigger the need for consent in almost every instance (building platforms generally being greater than 50m²).</p> <p>Also, as drafted, it could be interpreted that only earthworks and vegetation clearance for the purpose of access and/or a building platform are permitted (eg not farming earthworks and vegetation clearance).</p> <p>These changes are appropriate because earthworks or indigenous vegetation clearance associated with the building is assessed as a restricted discretionary activity matter with the building resource consent application.</p> <p>Life of District Plan as a compliance measure is unnecessarily limited and does not recognise the ability for the land to heal each season (ie calendar year) after earthworks.</p> <p>Screening should only be from public places (which includes the CMA) for the rule to efficiently apply.</p>	<p><i>earthworks or indigenous vegetation clearance must (where relevant):</i> 1. <i>not occur in outstanding natural character areas.</i> 2. <i>not exceed a total area of 50m² for 10 years from the notification of the District Plan per calendar year</i> in an area of high natural character. 3. <i>not exceed a total area of 400m² for 10 years from the notification of the District Plan per calendar year</i> in an area outside high or outstanding natural character areas. 4. <i>not exceed a cut height or fill depth of 1m 1.5m.</i> 5. <i>screen any exposed faces visible from a public place;</i> or 6. <i>be for the purpose of access and/or a building platform.</i> Note: <i>The NESF requires a 10m setback from any natural wetland in respect of earthworks or vegetation clearance and may require consent from the Regional Council.</i></p>
Ed and Inge Amsler (S341)	S341.013	Coastal environment	CE-S3	Oppose	<p>When coupled with development in the Mixed Use Zone, the effects of earthworks are likely to be temporary in nature. The sediment and erosion control requirements are already outlined in the Earthworks Chapter and in many</p>	<p>Amend the following: where earthworks in the Mixed Use Zone are required alongside development, the provisions should enable a greater area and cut / fill</p>

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					cases there will be limited approaches to manage the temporary visual amenity effects from earthworks as the rules seem to be targeting.	depths; and, to screen all exposed faces or require a resource consent should only relate to those faces which can be seen from a public place.
Tapuaetahi Incorporation (S407)	S407.001	Coastal environment	CE-S3	Support in part	In terms of the Coastal Environment provisions, CE-S3 Earthworks or indigenous vegetation clearance is not at all reasonable in the context of a working farm, which a large part of the landholding is. Operational requirements associated with farming offer many examples as to why these rules are considered overly onerous. This includes: <ul style="list-style-type: none"> - Changes to farm race track alignment and widening; - Providing farm infrastructure such as troughs, yards, and fences. 	Amend CE-S3: Any earthworks or indigenous vegetation clearance must (where relevant): 1. not occur in outstanding natural character areas. 2. not exceed a total area of 50m ² for 10 years from the notification of the District Plan in an area of high natural character. 3. not exceed a total area of 2,5400m² for 10 years from the notification of the District Plan in an area outside high or outstanding natural character areas. 4. not exceed a cut height or fill depth of 1m. 5. screen any exposed faces. Note: The NESF requires a 10m setback from any natural wetland in respect of earthworks or vegetation clearance and may require consent from the Regional Council.
Kapiro Conservation Trust (S442)	S442.123	Coastal environment	CE-S3	Support in part	Support strict limits on vegetation clearance and earthworks in high and outstanding natural character areas. Particularly CE-S3(3) appears	Amend CE-S3 to ensure alignment with any amendments to CE-R3 above to make sure these rules and

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					to override the IB provisions in regards to SNAs. This is not clear and should be tightened up.	standards are at least as strict as the IB chapter or even stricter.
Waiaua Bay Farm Limited (S463)	S463.066	Coastal environment	CE-S3	Not Stated	<p>If the relief sought in respect of the deletion of the ONC80 layer from the Totara Forest is not granted (refer to submission points S463.056 to S463.058), WBF seeks that this rule is amended to provide a discretionary pathway for earthworks and vegetation removal within the ONC80, given that this area has been modified and needs ongoing maintenance to provide amenity to guests and future residents of Kauri Cliffs.</p> <p>Sub-clause (2) needs to be amended as 50 m² per calendar year is much more appropriate than 50 m² per 10 years. The latter is highly conservative, and these effects can be managed with appropriate management plans.</p> <p>For areas outside the HNC area there is no need for such a conservative approach and a discretionary activity provides an appropriate pathway.</p>	<p>Amend points 2. and 3. of Standard CE-S3 as follows:</p> <p>2. not exceed a total area of 50 m² for 10 years from the notification of the District Plan per calendar year, in an area of high natural character.</p> <p>3. not exceed a total area of 400 m² for 10 years from the notification of the District Plan per calendar year in an area outside high or outstanding natural character areas.</p>
Owen Burn (S490)	S490.006	Coastal environment	CE-S3	Oppose	<p>The standards proposed for activities within the overlays applying to the site at Orokawa Bay would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act.</p> <p>Further, the submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include imitations on the height, colour and reflectivity of buildings.</p>	Delete the provisions of Standard CE-S3 limiting the aerial extent and height of cut and fill of earthworks.
Eric Kloet (S491)	S491.006	Coastal environment	CE-S3	Oppose	<p>The standards proposed for activities within the overlays applying to the site at Waipohutukawa Bay (Lots 5 and 18 of DP 391213) would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act.</p> <p>Further, the submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These</p>	Delete the provisions of Standard CE-S3 limiting the aerial extent and height of cut and fill of earthworks.

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					include imitations on the height, colour and reflectivity of buildings.	
Ironwood Trust Limited (S492)	S492.006	Coastal environment	CE-S3	Oppose	The standards proposed for activities within the overlays applying to the site at Jack's Bay and Waipiro Bay would limit the reasonable development of land within the overlay to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act. Further, the submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include the identification of farming and forestry as discretionary activities, setbacks from MHWS and imitations on the height and colour of buildings	Delete the provisions of Standard CE-S3 limiting the aerial extent and height of cut and fill of earthworks.
William Goodfellow (S493)	S493.013	Coastal environment	CE-S3	Oppose	The submitter also considers that the activity status and standards imposed on activities within the coastal environment are unnecessarily onerous. These include imitations on setback for buildings from MHWS, and limitations over the area, height, colour and reflectivity of buildings.	Amend provisions limiting the aerial extent and height of cut and fill of earthworks be deleted.
Ian Jepson (S494)	S494.013	Coastal environment	CE-S3	Oppose	Further, the submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include the identification of farming and forestry as discretionary activities, and imitations on the height, colour and reflectivity of buildings.	Amend provisions limiting the aerial extent and height of cut and fill of earthworks be deleted.
Ricky Faesen Kloet (S495)	S495.010	Coastal environment	CE-S3	Oppose	The submitter considers that the proposed standards that apply to activities located within the coastal environment overlay would limit the reasonable development of land to an extent that is unnecessarily onerous and inconsistent with the purpose of the Act.	Delete CE-S3 (inferred).
Philip Thornton (S496)	S496.011	Coastal environment	CE-S3	Oppose	The imposition of controls intended to manage development make the reasonable use and development of the property unnecessarily onerous (inferred).	Amend provisions limiting the aerial extent and height of cut and fill of earthworks be deleted.
Mark John Wyborn (S497)	S497.011	Coastal environment	CE-S3	Support in part	The imposition of controls intended to manage development make the reasonable use and development of the property unfairly and unnecessarily constrained (inferred).	Amend provisions limiting the aerial extent and height of cut and fill of earthworks be deleted.

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Northland Planning and Development 2020 Limited (S502)	S502.020	Coastal environment	CE-S3	Support in part	It is understood that some controls are needed on indigenous vegetation clearance within the coastal environment, which is why no changes have been proposed to the stated amount. While the 10-year timeframe is easily able to monitor from aerials for vegetation clearance, for earthworks this is not the case. This is especially evident on larger blocks which are farmed where small scale earthworks are undertaken regularly. It is considered more appropriate to allow 400m ² of earthworks per calendar year for sites within the coastal environment overlay. This will ensure that earthworks are controlled to a certain degree, whilst still enabling ongoing farming activities as well as establishment of some new buildings or structures, which do not breach the 400m ² area. The provision for 400m ² of earthworks per calendar year is considered to be a good compromise to ensure that the objectives and policies within the coastal environment overlay are adhered to.	Amend point 3 of Standard CE-S3 as follows: 1. For indigenous vegetation clearance - not exceed a total area of 400m² for 10 years from the notification of the District Plan and for earthworks - not exceed a total area of 400m² per calendar year in an area outside high or outstanding natural character areas. In the event Council does not accept the relief above, we seek that this applies to Waitangi Estate only.
Waitangi Limited (S503)	S503.018	Coastal environment	CE-S3	Not Stated	It is understood that some controls are needed on indigenous vegetation clearance within the coastal environment, which is why no changes have been proposed to the stated amount. While the 10-year timeframe is easily able to monitor from aerials for vegetation clearance, for earthworks this is not the case. This is especially evident on larger blocks which are farmed where small scale earthworks are undertaken regularly. It is considered more appropriate to allow 400m ² of earthworks per calendar year for sites within the coastal environment overlay. This will ensure that earthworks are controlled to a certain degree, whilst still enabling ongoing farming activities as well as establishment of some new buildings or structures, which do not breach the 400m ² area. The provision for 400m ² of earthworks per calendar year is considered to be	Amend point 3 of Standard CE-S3 as follows: 1. For indigenous vegetation clearance - not exceed a total area of 400m² for 10 years from the notification of the District Plan and for earthworks - not exceed a total area of 400m² per calendar year in an area outside

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					a good compromise to ensure that the objectives and policies within the coastal environment overlay are adhered to.	high or outstanding natural character areas. In the event Council does not accept the relief above, we seek that this applies to Waitangi Estate only.
Royal Forest and Bird Protection Society of New Zealand (S511)	S511.104	Coastal environment	CE-S3	Support in part	Support strict limits on vegetation clearance and earthworks in high and outstanding natural character areas. Particularly CE-S3(3) appears to override the IB provisions in regards to SNAs. This is not clear and should be tightened up.	Amend CE-S3 to ensure alignment with any amendments to CE-R3 above to make sure these rules and standards are at least as strict as the IB chapter or even stricter.
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527)	S527.025	Coastal environment	CE-S3	Oppose	PDP standard CE-S3 allows an excessively large area (up to 400m ²) earthworks or indigenous vegetation clearance in areas that are not high or outstanding natural character areas.	Amend to reduce the earthworks and indigenous vegetation clearance in areas that are not high or outstanding natural character areas (inferred)
Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527)	S527.026	Coastal environment	CE-S3	Oppose	Note under CE-S3 incorrectly refers only to a 10m setback distance in the NES-F in relation to regional council consent, when in fact the NES-F provisions also cover some activities within 100m of a natural wetland that require consent from the regional council.	Amend the note to give effect to the NES-F
Carbon Neutral NZ Trust (S529)	S529.150	Coastal environment	CE-S3	Support	PDP standard CE-S3 allows an excessively large area (up to 400m ²) earthworks or indigenous vegetation clearance in areas that are not high or outstanding natural character areas. A Note under CE-S3 incorrectly refers only to a 10m setback distance in the NES-F in relation to regional council consent, when in fact the NES-F provisions also cover some activities within 100m of a natural wetland that require consent from the regional council. The Note should be amended.	Amend CE-S3 note to reflect NES-F provisions

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Lynley Newport (S93)	S93.001	Coastal environment	CE-R10	Support in part	Support the need to manage development within coastal hazard areas but believe all hazard provisions should be located in the Natural Hazards chapter. A cross reference in the Coastal Environment back to the Natural hazards chapter can be included.	Transfer Rule CE-R10 from the Coastal Environment chapter (rules section addressing coastal hazards) into the Natural Hazards chapter. Consequently, insert a cross reference within the Coastal Environment chapter to this effect.
Willowridge Developments Limited (S250)	S250.016	Coastal environment	CE-R10	Support in part	Consider that existing activities and buildings should be recognised and provided for. The default performance standard of no increase in GFA or footprint of structures is overly restrictive and will require unnecessary resource consent applications.	Amend CE-R10 to provide for additional and alterations to existing activities as a permitted activity.
New Zealand Maritime Parks Ltd (S251)	S251.009	Coastal environment	CE-R10	Support in part	The PDP seeks to manage the risk from natural hazards to people, property and infrastructure. NZMPL's site of interest is subject to Coastal Flood hazards, while NZMPL appreciate the importance of managing risk from natural hazards, it considers that existing activities and buildings should be recognised and provided for. NZMPL consider that the default performance standard of no increase in GFA or footprint of structures, is overly restrictive and will require unnecessary resource consent applications	Amend Rule CE-R10 to provide for additional and alterations to existing activities as a permitted activity.
Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd (S344)	S344.019	Coastal environment	CE-R10	Not Stated	The default performance standard of no increase in GFA or footprint of structures is overly restrictive and will require unnecessary resource consent applications.	Amend CE-R10 to provide for additional and alterations to existing activities as a permitted activity.
John Andrew Riddell (S431)	S431.044	Coastal environment	CE-R10	Not Stated	Not stated	Amend the 'matters of discretion' in Rule CE-R10 to refer to Rule CE-R16 instead of Rule CE-R17
William Goodfellow (S493)	S493.009	Coastal environment	CE-R10	Oppose	The submitter also considers that the activity status and standards imposed on activities within the coastal environment are unnecessarily	Amend the provisions within the plan that impose limitations on the area of new buildings located within

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					onerous. These include imitations on setback for buildings from MHWS, and limitations over the area, height, colour and reflectivity of buildings.	the coastal environment overlay be deleted.
Ian Jepson (S494)	S494.009	Coastal environment	CE-R10	Oppose	Further, the submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include the identification of farming and forestry as discretionary activities, and imitations on the height, colour and reflectivity of buildings.	Amend the provisions within the plan that impose limitations on the area of new buildings located within the coastal environment overlay be deleted.
Philip Thornton (S496)	S496.007	Coastal environment	CE-R10	Oppose	The submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include imitations on the height, colour and reflectivity of buildings.	Amend the provisions within the plan that impose limitations on the area of new buildings located within the coastal environment overlay be deleted.
Mark John Wyborn (S497)	S497.007	Coastal environment	CE-R10	Support in part	The imposition of controls intended to manage development make the reasonable use and development of the property unfairly and unnecessarily constrained (inferred).	Amend the provisions within the plan that impose limitations on the area of new buildings located within the coastal environment overlay be deleted.
Lynley Newport (S93)	S93.002	Coastal environment	CE-R11	Support in part	Support the need to manage development within coastal hazard areas but believe all hazard provisions should be located in the Natural Hazards chapter. A cross reference in the Coastal Environment back to the Natural hazards chapter can be included.	Transfer Rule CE-R11 from the Coastal Environment chapter (rules section addressing coastal hazards) into the Natural Hazards chapter. Consequently, insert a cross reference within the Coastal Environment chapter to this effect.
John Andrew Riddell (S431)	S431.045	Coastal environment	CE-R11	Not Stated	Not stated	Amend the 'matters of discretion' in Rule CE-R11 to refer to Rule CE-R16 instead of Rule CE-R17
Top Energy Limited (S483)	S483.176	Coastal environment	CE-R11	Support	Top Energy supports the permitted activity status for this activity where there is no increase in footprint for above ground infrastructure and does not direct coastal inundation. Top Energy also supports the restricted discretionary activity status for non-compliance with this rule.	Retain Rule CE-R11
Lynley Newport (S93)	S93.003	Coastal environment	CE-R12	Support in part	Support the need to manage development within coastal hazard areas but believe all hazard provisions should be located in the Natural	Transfer Rule CE-R12 from the Coastal Environment chapter (rules section addressing coastal hazards)

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					Hazards chapter. A cross reference in the Coastal Environment back to the Natural hazards chapter can be included.	into the Natural Hazards chapter. Consequently, insert a cross reference within the Coastal Environment chapter to this effect.
Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd (S344)	S344.020	Coastal environment	CE-R12	Not Stated	CE-R12 as drafted will not enable the development of any form of new building, change of use of buildings or extension of existing buildings of appropriate size without the requirement to obtain a resource consent. This is overly restrictive and will require unnecessary resource consent applications.	Amend CE-R12 to provide new buildings and structures within urban zoned land as a permitted activity.
Tapuaetahi Incorporation (S407)	S407.002	Coastal environment	CE-R12	Support in part	It is contended that a provision should be provided within the PDP which enables, as a permitted activity, the ability for people to exercise their existing use rights, where rebuilding a house 'like for like' and which result in effects which are the same or similar in character, intensity, and scale.	Amend CE-R12 to: Activity status: Permitted Where: PER-1 The building or structure is one of the following: i. above ground buildings and structures with a footprint of 10m2 or less and are not used for a vulnerable activity. ii. decks less than 30m2 and less than 1m in height. PER 2 The building or structure including any associated earthworks, does not direct coastal inundation onto other properties. PER 3 All standards of the relevant zone applying to the activity are met. Exemption: A building or structure which is developed in accordance with s10 and s20 of the RMA.
John Andrew	S431.046	Coastal environment	CE-R12	Not Stated	Not stated	Amend the 'matters of discretion' in Rule CE-R12 to refer to Rule CE-

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Riddell (S431)						R16 instead of Rule CE-R17
Ngā Tai Ora - Public Health Northland (S516)	S516.060	Coastal environment	CE-R12	Support	Ngā Tai Ora support the concept of managing vulnerable activities within hazard areas.	Retain Rule CE-R12
Lynley Newport (S93)	S93.004	Coastal environment	CE-R13	Support in part	Support the need to manage development within coastal hazard areas but believe all hazard provisions should be located in the Natural Hazards chapter. A cross reference in the Coastal Environment back to the Natural hazards chapter can be included.	Transfer Rule CE-R13 from the Coastal Environment chapter (rules section addressing coastal hazards) into the Natural Hazards chapter. Consequently, insert a cross reference within the Coastal Environment chapter to this effect.
Northland Planning and Development 2020 Limited (S502)	S502.021	Coastal environment	CE-R13	Support in part	If you need consent for any other rule in a zone then you also breach this standard. This should be removed for this reason as it triggers unnecessary consent.	Delete PER-5 of Rule CE-R13 If similar wording remains, we ask that an assessment of the district is completed to ensure that there are no special zones or lifestyle zoning which may lie outside of the Rural environment which would trigger this rule.
Waitangi Limited (S503)	S503.019	Coastal environment	CE-R13	Not Stated	If you need consent for any other rule in a zone then you also breach this standard. This should be removed for this reason as it triggers unnecessary consent.	Delete PER-5 of Rule CE-R13 If similar wording remains, we ask that an assessment of the district is completed to ensure that there are no special zones or lifestyle zoning which may lie outside of the Rural environment which would trigger this rule.
Lynley Newport (S93)	S93.005	Coastal environment	CE-R14	Support in part	Support the need to manage development within coastal hazard areas but believe all hazard provisions should be located in the Natural Hazards chapter. A cross reference in the Coastal Environment back to the Natural hazards chapter can be included.	Transfer Rule CE-R14 from the Coastal Environment chapter (rules section addressing coastal hazards) into the Natural Hazards chapter. Consequently, insert a cross reference within the Coastal Environment chapter to this effect.

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Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd (S344)	S344.021	Coastal environment	CE-R14	Not Stated	CE-R14 as drafted will not enable the development of any form of new building, change of use of buildings or extension of existing buildings of appropriate size without the requirement to obtain a resource consent. This is overly restrictive and will require unnecessary resource consent applications.	Amend CE-R14 to provide new buildings and structures within urban zoned land as a permitted activity.
William Goodfellow (S493)	S493.010	Coastal environment	CE-R14	Oppose	The submitter also considers that the activity status and standards imposed on activities within the coastal environment are unnecessarily onerous. These include imitations on setback for buildings from MHWS, and limitations over the area, height, colour and reflectivity of buildings.	Amend the provisions within the plan that impose limitations on the area of new buildings located within the coastal environment overlay be deleted.
Ian Jepson (S494)	S494.010	Coastal environment	CE-R14	Oppose	Further, the submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include the identification of farming and forestry as discretionary activities, and imitations on the height, colour and reflectivity of buildings.	Amend the provisions within the plan that impose limitations on the area of new buildings located within the coastal environment overlay be deleted.
Philip Thornton (S496)	S496.008	Coastal environment	CE-R14	Oppose	The submitter considers that the activity status imposed on activities within the coastal environment are unnecessarily onerous. These include imitations on the height, colour and reflectivity of buildings.	Amend the provisions within the plan that impose limitations on the area of new buildings located within the coastal environment overlay be deleted.
Mark John Wyborn (S497)	S497.008	Coastal environment	CE-R14	Support in part	The imposition of controls intended to manage development make the reasonable use and development of the property unfairly and unnecessarily constrained (inferred).	Amend the provisions within the plan that impose limitations on the area of new buildings located within the coastal environment overlay be deleted.
Ngā Tai Ora - Public Health Northland (S516)	S516.061	Coastal environment	CE-R14	Support	Ngā Tai Ora support the concept of managing vulnerable activities within hazard areas.	Retain Rule CE-R14
Lynley Newport (S93)	S93.006	Coastal environment	CE-R15	Support in part	Support the need to manage development within coastal hazard areas but believe all hazard provisions should be located in the Natural Hazards chapter. A cross reference in the	Transfer Rule CE-R15 from the Coastal Environment chapter (rules section addressing coastal hazards) into the Natural Hazards chapter.

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					Coastal Environment back to the Natural hazards chapter can be included.	Consequently, insert a cross reference within the Coastal Environment chapter to this effect.
Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd (S344)	S344.022	Coastal environment	CE-R15	Not Stated	CE-R15 as drafted will not enable the development of any form of new building, change of use of buildings or extension of existing buildings of appropriate size without the requirement to obtain a resource consent. This is overly restrictive and will require unnecessary resource consent applications.	Amend CE-R15 to provide new buildings and structures within urban zoned land as a permitted activity.
Lynley Newport (S93)	S93.007	Coastal environment	CE-R16	Support in part	Support the need to manage development within coastal hazard areas but believe all hazard provisions should be located in the Natural Hazards chapter. A cross reference in the Coastal Environment back to the Natural hazards chapter can be included.	Transfer Rule CE-R16 from the Coastal Environment chapter (rules section addressing coastal hazards) into the Natural Hazards chapter. Consequently, insert a cross reference within the Coastal Environment chapter to this effect.
Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd (S344)	S344.023	Coastal environment	CE-R16	Not Stated	CE-R16 as drafted will not enable the development of any form of new building, change of use of buildings or extension of existing buildings of appropriate size without the requirement to obtain a resource consent. This is overly restrictive and will require unnecessary resource consent applications.	Amend CE-R16 to provide new buildings and structures within urban zoned land as a permitted activity.
Lynley Newport (S93)	S93.008	Coastal environment	CE-R17	Support in part	Support the need to manage development within coastal hazard areas but believe all hazard provisions should be located in the Natural Hazards chapter. A cross reference in the Coastal Environment back to the Natural hazards chapter can be included.	Transfer Rule CE-R17 from the Coastal Environment chapter (rules section addressing coastal hazards) into the Natural Hazards chapter. Consequently, insert a cross reference within the Coastal Environment chapter to this effect.
Northland Planning and Developme	S502.022	Coastal environment	CE-R17	Support in part	seek that the hyperlinking is checked to ensure CE-R17 is covering the right information	Amend to ensure that the hyperlinking in CE-R17 is covering the right information

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nt 2020 Limited (S502)						
Ngā Tai Ora - Public Health Northland (S516)	S516.062	Coastal environment	CE-R17	Oppose	The provision duplicates Rule HS-R8, Ngā Tai Ora support the activity status of HS-R8.	Delete Rule CE-R17
Lynley Newport (S93)	S93.009	Coastal environment	CE-R18	Support in part	Support the need to manage development within coastal hazard areas but believe all hazard provisions should be located in the Natural Hazards chapter. A cross reference in the Coastal Environment back to the Natural hazards chapter can be included.	Transfer Rule CE-R18 from the Coastal Environment chapter (rules section addressing coastal hazards) into the Natural Hazards chapter. Consequently, insert a cross reference within the Coastal Environment chapter to this effect.
Northland Planning and Development 2020 Limited (S502)	S502.023	Coastal environment	CE-R18	Oppose	CE-R18 is a copy of CE-R17	Delete CE-R18
Ngā Tai Ora - Public Health Northland (S516)	S516.063	Coastal environment	CE-R18	Oppose	The provision duplicates Rule HS-R8, Ngā Tai Ora support the activity status of HS-R8.	Delete Rule CE-R18
Lynley Newport (S93)	S93.010	Coastal environment	CE-R19	Support in part	Support the need to manage development within coastal hazard areas but believe all hazard provisions should be located in the Natural Hazards chapter. A cross reference in the Coastal Environment back to the Natural hazards chapter can be included.	Transfer Rule CE-R19 from the Coastal Environment chapter (rules section addressing coastal hazards) into the Natural Hazards chapter. Consequently, insert a cross reference within the Coastal Environment chapter to this effect.
Paihia Properties Holdings Corporate Trustee Limited and	S344.024	Coastal environment	CE-R19	Oppose	CE, HNCA, ONCA and Coastal Hazards are overlays in the district plan, management of land use and activities is more appropriately managed via the underlying zone. It is considered that a catch all default of	Delete Rule CE-R19

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UP Management Ltd (S344)					discretionary activity is inappropriate and restrictive.	
Lynley Newport (S93)	S93.011	Coastal environment	CE-S4	Support in part	Support the need to manage development within coastal hazard areas but believe all hazard provisions should be located in the Natural Hazards chapter. A cross reference in the Coastal Environment back to the Natural hazards chapter can be included.	Transfer Standard CE-S4 from the Coastal Environment chapter (standards section addressing coastal hazards) into the Natural Hazards chapter. Consequently, insert a cross reference within the Coastal Environment chapter to this effect.
RS Eng Ltd (S562)	S562.001	Coastal environment	CE-S4	Not Stated	Standard CE-S4 is incorrectly worded and could be misinterpreted. The standard also requires minimum floor levels which are greater than required by the building code. New buildings only require a design life of 50 years, and thus 0.5m of sea level rise. Whilst subdivisions require planning timeframes of 100 years, so the 1m sea level rise is correct.	Amend Standard CE-S4 to separate new buildings from subdivision.
Lynley Newport (S93)	S93.012	Coastal environment	CE-S5	Support in part	Support the need to manage development within coastal hazard areas but believe all hazard provisions should be located in the Natural Hazards chapter. A cross reference in the Coastal Environment back to the Natural hazards chapter can be included.	Transfer Standard CE-S5 from the Coastal Environment chapter (standards section addressing coastal hazards) into the Natural Hazards chapter. Consequently, insert a cross reference within the Coastal Environment chapter to this effect.
Bentzen Farm Limited (S167)	S167.082	Coastal environment	CE-S5	Oppose	As drafted, the standard may trigger the need for an engineering report for a resource consent for an activity anywhere on a site subject to a coastal hazard overlay. In most instances, the coastal hazard overlays are limited in area on a property. The related rules in this section consistently refer to 'location' which limits the assessment to the location of the activity sought, relative to the overlay. The standard should also refer to location to avoid this potential interpretation.	Amend standard CE-S5 as follows: Any application for a resource consent in relation to a site location that is potentially affected by a coastal hazard must be accompanied by a report prepared by a suitably qualified and experienced engineer that addresses the matters identified in the

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						relevant objectives, policies, performance standards and matters of control/discretion.
Setar Thirty Six Limited (S168)	S168.080	Coastal environment	CE-S5	Oppose	As drafted, the standard may trigger the need for an engineering report for a resource consent for an activity anywhere on a site subject to a coastal hazard overlay. In most instances, the coastal hazard overlays are limited in area on a property. The related rules in this section consistently refer to 'location' which limits the assessment to the location of the activity sought, relative to the overlay. The standard should also refer to location to avoid this potential interpretation.	Amend standard CE-S5 as follows: Any application for a resource consent in relation to a site location that is potentially affected by a coastal hazard must be accompanied by a report prepared by a suitably qualified and experienced engineer that addresses the matters identified in the relevant objectives, policies, performance standards and matters of control/discretion.
The Shooting Box Limited (S187)	S187.071	Coastal environment	CE-S5	Oppose	As drafted, the standard may trigger the need for an engineering report for a resource consent for an activity anywhere on a site subject to a coastal hazard overlay. In most instances, the coastal hazard overlays are limited in area on a property. The related rules in this section consistently refer to 'location' which limits the assessment to the location of the activity sought, relative to the overlay. The standard should also refer to location to avoid this potential interpretation.	Amend standard CE-S5 as follows: Any application for a resource consent in relation to a site location that is potentially affected by a coastal hazard must be accompanied by a report prepared by a suitably qualified and experienced engineer that addresses the matters identified in the relevant objectives, policies, performance standards and matters of control/discretion.

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Wendover Two Limited (S222)	S222.074	Coastal environment	CE-S5	Support in part	As drafted, the standard may trigger the need for an engineering report for a resource consent for an activity anywhere on a site subject to a coastal hazard overlay. In most instances, the coastal hazard overlays are limited in area on a property. The related rules in this section consistently refer to 'location' which limits the assessment to the location of the activity sought, relative to the overlay. The standard should also refer to location to avoid this potential interpretation.	Amend standard CE-S5 as follows: Any application for a resource consent in relation to a site location that is potentially affected by a coastal hazard must be accompanied by a report prepared by a suitably qualified and experienced engineer that addresses the matters identified in the relevant objectives, policies, performance standards and matters of control/discretion.
Matauri Trustee Limited (S243)	S243.100	Coastal environment	CE-S5	Oppose	As drafted, the standard may trigger the need for an engineering report for a resource consent for an activity anywhere on a site subject to a coastal hazard overlay. In most instances, the coastal hazard overlays are limited in area on a property. The related rules in this section consistently refer to 'location' which limits the assessment to the location of the activity sought, relative to the overlay. The standard should also refer to location to avoid this potential interpretation.	Amend standard CE-S5 as follows: Any application for a resource consent in relation to a site location that is potentially affected by a coastal hazard must be accompanied by a report prepared by a suitably qualified and experienced engineer that addresses the matters identified in the relevant objectives, policies, performance standards and matters of control/discretion