

SECTION 32 REPORT

Natural Features and Landscapes

May 2022

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1 Executive Summary

The Far North District has an extensive coastline with many harbours, large tracts of indigenous vegetation and a wide variety of natural processes that operate at varying scales. This has created a District rich in unique landscapes and features. In many instances, these landscapes are celebrated by cultural associations and stories. Modification of these places has been minimal largely due to their remote locations, historic heritage and in some cases challenging topography and geomorphology.

While Outstanding Natural Landscapes (**ONL**) and Outstanding Natural Features (**ONF**) provide important public benefit for the district, including the economic benefits of tourism, recreational use as well as aesthetic and cultural values, there is a cost to the landowner in terms of development rights. There is a challenge to balance the need to protect the characteristics and qualities of ONL and ONF while providing for appropriate use and development and enabling the use of Māori land. Landscapes and natural features are currently controlled in Chapter 12 Natural and Physical Resources within the Operative District Plan (**ODP**).

The approach in the Proposed Far North District Plan (**PDP**) seeks to align with the Natural features and natural landscapes chapter within the New Zealand Coastal Policy Statement (**NZCPS**) and the Regional Policy Statement for Northland (**RPS**). To give effect to this policy direction, the Natural Features and Landscapes chapter includes rules and standards that:

- Provide for limited development within ONL and ONF, whilst protecting their characteristics and qualities.
- Provide for permitted activity rules that:
 - Enable the repair and maintenance of certain activities;
 - Enable farming activities where they existed at the time the pdp was notified;
 - Enable buildings and structures ancillary to primary production; and
 - Enable limited extensions to lawfully established buildings and structures.
- Provide for limited activities as a discretionary activity.
- Identify prohibited activity status for new quarries and mining, land fill, managed fill and clean fill.
- Manage the height of buildings and structures, colours and materials as well as earthworks and indigenous vegetation clearance.

The main changes to the overall proposed management approach include:

- Use of updated mapping, which was undertaken by the RPS. ONL have been further updated through Outstanding Natural Features: Identifying and Mapping sites in Far North District Council: Methodology Report – Bruce W Hayward FRSNZ PhD: May 2016 (**Appendix 2**)
- Changes in language used within the provisions to give effect to high order planning documents.
- Changes in thresholds and activities provided for which is in line with the higher order planning documents, case law and a landscape report prepared by Melean Absolum Limited (**Appendix 1**).
- Provisions that align with the ‘hybrid approach’ of the PDP that focuses more on activity based rules compared to the effects based approach in the ODP.

2 Introduction and Purpose

2.1 Purpose of report

This report provides an evaluation undertaken by the Far North District Council (**Council**) in preparation of district plan provisions for the ONL and ONF topics in the PDP. This assessment is required by Section 32 of the Resource Management Act 1991 (**RMA**).

Section 32 of the RMA requires Councils to examine whether the proposed objectives are the most appropriate to achieve the purpose of the RMA and whether the provisions (i.e. policies, rules and standards) are the most appropriate way to achieve the objectives. This assessment must identify and assess environmental, economic, social, and cultural effects, benefits and costs anticipated from the implementation of the provisions. Section 32 evaluations represent an on-going process in RMA plan development and a further evaluation under section 32AA of the RMA is expected throughout the review process in response to submissions received following notification of the PDP.

This report sets out the issues for the Natural Features and Landscapes chapter, provides an overview of the statutory and policy context, and any specific consultation. The report also includes a review of the ODP and evaluation of alternatives to determine the most appropriate way(s) to achieve the purpose of the RMA in relation to the topic.

2.2 Overview of the topic

Council has obligations under section 6(b) of the RMA to protect ONL and ONF from inappropriate subdivision, use and development. The management and protection of outstanding landscapes and features is a significant resource management issue in the Far North District, with approximately 22% of the District being identified as ONL and 1.6% as ONF. These areas were identified through the regional mapping project undertaken by the Northland Regional Council (**NRC**) as part of the RPS in 2016. Further work and ground-truthing was also done by Council with respect to ONF in 2017.

Natural Features and Landscapes are managed together in Chapter 12 of the Operative District Plan (**ODP**). While the provisions in the ODP are of a similar nature to those proposed in the PDP, a more stringent framework is now applied to align with the policy framework of the NZCPS and the RPS. Further consideration now needs to be taken where ONL and ONF are located within the coastal environment, where the interpretation of policy has changed through the *'King Salmon'* decision. The coastal environment is principally addressed in its own chapter of the PDP in accordance with the National Planning Standards (**Planning Standards**).

Whether a natural landscape or feature is deemed to be 'outstanding' is determined through an assessment process that identifies whether the sum of its values (characteristics and qualities) equates to being considered "*conspicuous, eminent, especially because of excellence*" or "*remarkable in*"¹.

ONL and ONF are generally those that are unmodified. However, the Environment Court has recognised, in the context of landscapes that a spectrum of naturalness exists ranging from "*pristine natural landscapes to cityscapes*"². ONL and ONF were mapped by the NRC as part of their update of the RPS in 2016. The assessment methods used to identify them are summarised in RPS Appendix 1. In brief, ONL were identified using the following criteria:

- Natural science factors;
- Aesthetic values; and
- Experiential factors.

ONF were identified using the "Inventory (and maps) of Important Geological Sites and Landforms in the Northland Region", Geological Society of New Zealand unpublished report 95/2 (1995). Further

¹ C180 / 99, Wakatipu Environmental Society Inc v Queenstown Lakes District Council [para 82]

² Ibid [para 89]

work was undertaken by Council in 2017, in accordance with the RPS, to further identify and delineate ONF in the Far North District.

The change in provisions pertaining to the Natural Features and Landscapes chapter are part of a consolidated review of the Far North District Plan. The provisions proposed in this assessment have modified the existing provisions in the ODP to ensure the Natural Features and Landscapes provisions are consistent with the drafting of the PDP and the current policy environment, including NZCPS and the RPS.

Natural Features and Landscapes may also be subject to other District Wide Matters, including the protection of significant natural areas, natural character and the coastal environment. These topics have been evaluated within separate section 32 reports. The proposed Natural Features and Landscapes provisions will not conflict with any other relevant District Wide Matter provisions.

3 Statutory and Policy Context

3.1 Resource Management Act

The **Section 32 Overview Report** for the PDP provides a summary of the relevant statutory requirements in the RMA relevant to the PDP. This section provides a summary of the matters in Part 2 of the RMA (purpose and principles) of direct relevance to this topic.

Section 74(1) of the RMA states that district plans must be prepared in accordance with the provisions of Part 2. The purpose of the RMA is the sustainable management of natural and physical resources which is defined in section 5(2) of the RMA as:

“...sustainable management means managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural wellbeing, and for their health and safety while –

- (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.”*

To achieve the purpose of the RMA, all those exercising functions and powers under the RMA are required to:

- Recognise and provide for the matters of national importance identified in section 6
- Have particular regard to a range of other matters in section 7
- Take into account the principles of the Treaty of Waitangi in section 8 of the RMA.

The following section 6 matters are directly relevant to the Natural Features and Landscapes chapter:

- (b) The protection of outstanding Natural Features and Landscapes from inappropriate subdivision, use, and development.
- (e) The relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.

Section 6(b) is of primary relevance and specifically identifies ONL and ONF for protection. ONL in the PDP are consistent with those that have been identified in the RPS and account for approximately 22% of the Far North District’s land area, while ONF account for approximately 1.6%. Section 6(e) is also relevant given the extent of ‘General land owned by Māori’, ‘Māori customary land’ and ‘Māori freehold land’ (Māori land) identified within ONL and to a lesser extent ONF. Māori land accounts for approximately 16% of all land in the Far North District.

- ONL cover approximately 20% of all Māori land. Most of these ONL are found outside the coastal environment. Approximately one quarter of ONL on Māori land are located in the coastal environment.
- ONF cover approximately 1.8% of all Māori land. Approximately 90% of the ONF on Māori land are located in the coastal environment.
- The following section 7 matters are directly relevant to the Natural Features and Landscapes chapter

The following section 7 matters are directly relevant to the Natural Features and Landscapes chapter:

- (a) Kaitiakitanga:
- (b) The efficient use and development of natural and physical resources:
- (c) The maintenance and enhancement of amenity values:
- (e) Maintenance and enhancement of the quality of the environment:
- (f) Any finite characteristics of natural and physical resources:

Section 8 of the RMA requires that all persons exercising functions and powers under it take into account the principles of the Treaty of Waitangi, which have been considered in the preparation of the Natural Features and Landscapes chapter.

3.2 Higher order planning instruments

Section 75(3) of the RMA requires district plans to give effect to higher order planning instruments – National Policy Statement (**NPS**), National Planning Standards (**Planning Standards**), and the relevant Regional Policy Statement (**RPS**). The **Section 32 Overview Report** provides a more detailed summary of the relevant RMA higher order planning instruments relevant to the PDP. The sections below provide an overview of provisions in higher order planning instruments directly relevant to the Natural Features and Landscapes chapter in the PDP.

3.2.1 National Planning Standards

Section 75(3)(ba) of the RMA requires that district plans give effect to the Planning Standards. The Planning Standards were gazetted in April 2019 and the purpose is to assist in achieving the purpose of the RMA and improve consistency in the structure, format and content of RMA plans. The following standards and directions in the Planning Standards are of direct relevance to the Natural Features and Landscapes chapter.

In accordance with Mandatory Direction 7.21, if the following matters are addressed, they must be located in the *Natural Features and Landscapes* chapter:

- a. Identification of features and landscapes that are outstanding, significant or otherwise valued;
- b. Provisions to protect and manage outstanding natural features and landscapes including from inappropriate subdivision, use and development; and
- c. Provisions to manage other valued features and landscapes.

3.2.2 National Policy Statements

Section 75(3)(a) of the RMA requires that the district plans give effect to any NPS, and the NZCPS must be given effect to under section 75(3)(b). The table below outlines the provisions in the NZCPS are directly relevant to the Natural Features and Landscapes chapter.

NZCPS	
Policy 6	Activities in the coastal environment
Policy 15	Natural features and natural landscapes

The NZCPS only relates to ONL and ONF located inside the coastal environment.

The NZCPS is relevant and while principally addressed in the Coastal Environment chapter of the PDP it provides clear guidance in regard to the assessment and protection of ONL and ONF within the coastal environment. Policy 15 in the NZCPS requires subdivision, use and development to 'avoid' adverse effects on ONL and ONF.

The interpretation of Policy 15 in the NZCPS was made clear through the '*King Salmon*' decision³. The *King Salmon* decision determined how policies are to be interpreted, particularly where they are prescriptive in their intent. Policy 15(a) of the NZCPS requires activities to 'avoid' adverse effects on ONL and ONF in the coastal environment. The words in the NZCPS are clear and directive. Where the word 'avoid' is used it means 'not allow' or 'prevent the occurrence of'. *King Salmon* states that an 'overall balancing approach' should not be used when implementing the policies of the NZCPS. In the case of Policy 15 an 'environmental bottom line' is created and the adverse effects cannot be balanced against positive effects through revisiting Part 2 of the RMA.

In the context of the clear direction in Policy 15, Policy 6 of the NZCPS also requires:

- The provision of infrastructure to provide for the reasonably foreseeable needs of population growth without compromising values of the coastal environment.
- Recognition and appropriate provision of tangata whenua needs for papakāinga, marae and associated developments.

3.2.3 National Environmental Standards

Under section 74(1)(f) of the RMA, a district plan must be prepared in accordance with any regulations, which includes NES. Section 44A of the RMA requires local authorities to recognise NES by ensuring plan rules do not conflict with or duplicate provisions in a NES. The National Environmental Standards for Plantation Forestry 2017 (**NES-PF**) applies to any forest of at least one hectare that has been planted specifically for commercial purposes and will be harvested and provides a consistent set of regulations for plantation forestry activities. It covers 8 core plantation forestry activities, allowing these to be carried out as permitted activities, subject to conditions to manage potential effects on the environment, these are:

- Afforestation (planting new forest)
- Pruning and thinning to waste (selective felling of trees where the felled trees remain on site)
- Earthworks
- River crossings
- Forestry quarrying (extraction of rock, sand, or gravel within a plantation forest or for operation of a forest on adjacent land)
- Harvesting
- Mechanical land preparation
- Replanting.

The NES-PF recognises there may be a need for flexibility to protect sensitive local environments and provides for more stringent regulation of ONL and ONF in Regulation 6. Regulation 12 offers further consideration by ensuring there is no afforestation provided for within ONL or ONF as a permitted activity.

3.2.4 Regional Policy Statement for Northland

Section 75(3) of the RMA requires district plans to 'give effect' to any RPS. The RPS was made operative on 14 June 2018. The table below outlines the provisions in the RPS are directly relevant to the Natural Features and Landscapes chapter.

³ SC 82/2013 [2014] NZSC 38 Environmental Defence Society Inc v New Zealand King Salmon Company Limited

RPS	
Objective 3.14	Natural character, outstanding natural features, outstanding natural landscapes and historic heritage
Objective 3.15	Active Management
Policy 4.5.1	Identification of the coastal environment, outstanding natural features and outstanding natural landscapes and high and outstanding natural character
Policy 4.5.2	Application of the Regional Policy Statement - Maps
Policy 4.6.1	Managing effects on the characteristics and qualities Natural Character, Natural Features and Landscapes
Policy 4.7.1	Promote active management
Policy 4.7.2	Support landowner and community efforts

The RPS covers the management of natural and physical resources across the Northland Region. The provisions within the RPS give guidance at a higher planning level in terms of the significant regional issues.

In summary, the PDP approach gives effect to the relevant objectives and policies of the RPS through the following management measures:

- Applying updated maps that were created through the regional mapping project undertaken by the NRC as part of the RPS.
- Applying a two tiered approach to the protection of ONL and ONF where located within and outside the coastal environment.
- Enabling activities that are consistent and do not compromise the characteristics and qualities of ONL and ONF.
- Enable the consideration of ancestral uses that form part of the characteristics and qualities of ONL and ONF where they were not identified through the original mapping project.
- Encourage restoration and enhancement.
- Applying methods to control any adverse effects on the characteristics and qualities of ONL and ONF.

3.3 Regional Plan for Northland

Section 75(4)(b) of the RMA states that any district plan must not be inconsistent with a regional plan for any matter stated in section 30(1) of the RMA. Section 74(2)(a) of the RMA states that when preparing or changing a district plan, a territorial authority shall have regard to any proposed regional plan of its region in regard to any matter of regional significance or for which the regional council has primary responsibility under Part 4 of the RMA. The operative Northland Regional Plans and proposed Northland Regional Plan are summarised in the **Section 32 Overview Report**. The table below provides an overview of regional plan provisions directly relevant to the Natural Features and Landscapes chapter.

Proposed Regional Plan	
Objective F.1.12	Natural character, outstanding natural features, historic heritage and places of significance to tangata whenua
Policy D.2.1	Rules for managing natural and physical resources
Policy D.2.17	Managing adverse effects on natural character, outstanding natural landscapes and outstanding natural features

The Proposed Regional Plan combines the operative Regional Plans (coastal, air quality, water and soil) into one plan. The provisions of the Proposed Regional Plan relating to managing natural and physical resources and more specifically outstanding natural features and landscapes will be relevant for any proposed development. The relevant objectives and policies have been taken into consideration in the drafting of the Natural Features and Landscapes chapter.

3.4 Iwi and Hapū Environmental Management Plans

When preparing and changing district plans, Section 74(2A) of the RMA requires Council to take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the district. At present there are 14 iwi planning documents accepted by Council which are set out and summarised in the **Section 32 Overview Report**.

Each plan is comprehensive and covers a range of issues of importance to the respective iwi or hapū. The plans contain statements of identity and whakapapa and identify the rohe over which mana whenua is held. The cultural and spiritual values associated with the role of kaitiaki over resources within their rohe are articulated.

The key issues in these plans that have been taken into account in the preparation of the provision for the Natural Features and Landscapes chapter are as follows:

- As kaitiaki, having responsibility in ensuring that sacred sites are protected and remain undisturbed.
- The ongoing damage and destruction to areas or sites with customary values which contribute to or form a part of a cultural landscape.
- The desecration of cultural landscapes and the little regard had for expert cultural advice.
- Inappropriate land use, buildings and structures compromising cultural and spiritual values.

Spiritual, cultural and historical associations form part of the criteria for identifying and attributing characteristics and qualities to an ONL in accordance with the mapping methods and criteria in the RPS. Spiritual and cultural values were not well represented in terms of their characteristics and qualities when the NRC undertook the mapping process for ONL.

The policy framework within the Natural Features and Landscapes chapter supports the additional consideration of ancestral relationships and use of Māori Purpose or Treaty Settlement land as forming part of the characteristics and qualities of an ONL or ONF in any assessment. Furthermore, any historical, spiritual or cultural association held by tangata whenua will be included as a matter of consideration for any resource consent application. Very few buildings or structures are provided for within the proposed rules and methods for ONL and ONF meaning in the majority of cases consent will be required.

3.5 Other Legislation and Policy Documents

When preparing or changing a district plan, section 74(2)(b)(i) of the RMA requires territorial authorities to have regard to management plans and strategies prepared under other Acts to the extent that it has a bearing on resource management issues of the district. The **Section 32 Overview**

Report provides a more detailed overview of strategies and plans prepared under legislation that are relevant to PDP.

Several of the Community Plans held by Council reference landscapes and features, recognising the importance of maintaining the values of these landscapes and features located within their rohe. This sentiment aligns Council's obligation under section 6 of the RMA to protect ONL and ONF from inappropriate subdivision, use, and development.

4 Current state and Resource Management Issues

This section provides an overview of the relevant context for the current approach to manage Natural Features and Landscapes through the ODP, and key issues raised through consultation. It concludes with a summary of the key resource management issues for Natural Features and Landscapes to be addressed through the PDP.

4.1 Context

The current mapping of ONL in the ODP was based on a landscape assessment undertaken by LA4 Landscape Architects in 1995. The ONF in the ODP were mapped based on the Geo-Preservation Inventory "Inventory of Important Geological Sites and Landforms in the Northland Region", Geological Society of New Zealand Miscellaneous Publication No. 67, Kenny JA and Hayward BW, (1993).

4.2 Operative District Plan Approach

4.2.1 Summary of current management approach

The management of landscapes and natural features is contained within Chapter 12 of the ODP (Natural and Physical Resources – Landscape and Natural Features). The objectives and policies of the ODP aim to protect outstanding landscapes and natural features areas through identifying these areas in line with the RPS that was operative at the time. The policy framework aims to avoid, remedy or mitigate significant adverse effects on the character of outstanding natural features and landscapes, while taking into consideration positive effects as well as cumulative effects. There is also emphasis on the visual effects of built development and a list of criteria to consider when resource consent is sought.

The ODP has a number of non-statutory methods to achieve the protection of landscapes and natural features, including the encouragement of permanent legal protection, codes of conduct for land development and education.

The primary mechanism for managing outstanding landscapes and features in the ODP is by rules that control:

- The planting of trees, including thresholds and instances where it is appropriate as a permitted activity.
- Utility services where they are positioned above and underground.
- Excavation and filling, including thresholds where it is appropriate as a permitted activity.
- Vegetation clearance, including thresholds and instances where it is appropriate as a permitted activity.
- Buildings within onl, including size, colour and location controls where it is appropriate as a permitted activity
- Development on onf or within outstanding landscape features.

There is also a 'development bonus' provision included which seeks to encourage the permanent protection or enhancement of ONL or ONF. The number of bonus lots is discretionary and relative to the protection or enhancement offered through an application.

4.2.2 Limitation with current approach

The Council has reviewed the current ODP approach, which has been informed technical advice, internal workshops and feedback from the community.

A number of limitations with the ODP approach have been identified through this process, including:

- The terms 'Outstanding landscapes' and 'outstanding landscape features' are not consistent with the terms used in the RMA and higher order statutory documents.
- The provisions are not consistent with the management approach and language in the NZCPS and the RPS. The ODP does not follow the two tier policy approach of the NZCPS and the RPS in terms of the level of protection required for ONL and ONF in the coastal environment. This language stems from the Supreme Court's King Salmon decision⁴, which determines how policies are to be interpreted particularly where the word 'avoid' is used.
- The ODP does not have a statutory mechanism to identify ONL or ONL, so therefore does not give effect to the RPS.
- The ODP Rule 12.1.6.1.2 sets out a number of exemptions for indigenous vegetation clearance in outstanding landscapes. Some of these exemptions are justified (i.e. removal for maintenance of existing infrastructure and safety of people and property). However, a permitted standard of 1,000m² of clearance to provide for a building platform and access could incur adverse effects on an ONL. Of particular relevance are ONL located in the coastal environment where the framework now requires that adverse effects are avoided. The report prepared by Melean Absolum Limited supports the permitted threshold in the PDP which is significantly smaller at 50m².

4.3 Key issues identified through consultation

The **Section 32 Overview Report** provides a detailed overview of the consultation and engagement Council has undertaken with tangata whenua, stakeholders and communities throughout the district to inform the development of the PDP and the key issues identified through this consultation and engagement. This section provides an overview of key issues raised through consultation in relation to the Natural Features and Landscapes chapter and a summary of advice received from iwi authorities.

4.3.1 Summary of issue raised through consultation

There was a reasonable level of interest in the Natural Features and Landscapes chapter from the community through consultation and engagement of the PDP. Much of the feedback simply either supported or opposed the provisions. In terms of the more detailed feedback the following was identified through this process:

- Clarification of how natural landscapes and features within the coastal environment which are not identified as ONL or ONF are addressed.
- Better integration with the Ecosystems and Indigenous Biodiversity chapter ensuring there is consistency.
- Better linkages to the worksheets for ONL and ONF.
- The need to follow through for prohibited activities where land use and subdivision that would result in any loss of and/or destruction of the characteristics and qualities of ONL and ONF.
- The accuracy of the mapping project undertaken by the NRC and the ability to change the maps.
- Better recognition of the role of regional or critical infrastructure.
- ONLs and ONFs should be left to the Department of Conservation and NRC to address.

In response to the above:

⁴ SC 82/2013 [2014] NZSC 38 Environmental Defence Society Inc v New Zealand King Salmon Company Limited

- The regional mapping project undertook an assessment of the region in terms of ONL and ONF, those that were not identified as being outstanding default to being 'other' landscapes and features. The characteristics and qualities that contribute to their natural character in a coastal context are appropriately protected in the Coastal Environment chapter of the PDP.
- The standards for earthworks and indigenous vegetation have been amended to be consistent with other overlays in the PDP.
- More comprehensive linkages and schedules are provided for the worksheets for ONL and ONF.
- New quarries, mining, land fill, managed fill and clean fill are considered to result in the loss of and/or destruction of the characteristics and qualities of ONL and ONF and are now prohibited.
- The mapping project was undertaken by the NRC for the RPS and went through a full schedule 1 public RMA process. No further assessments have been undertaken to challenge the existing mapping, as such Council will give effect to the RPS, as it is required to do.
- Within policy NFL-P8 recognition is given to the functional need for any regionally significant or critical infrastructure in any assessment of a discretionary or non-complying activity. The maintenance and repair of network utilities is a permitted activity in NFL-R2, where this is not achieved, the activity is provided for as a discretionary activity.
- The PDP is required to give effect to the RPS, therefore must include maps and provisions for the protection of ONL and ONF from inappropriate subdivision, use and development.

4.3.2 Summary of advice from iwi authorities

Section 32(4A)(a) of the RMA requires that evaluation reports include a summary of advice on a proposed plan received from iwi authorities. The **Section 32 Overview Report** provides an overview of the process to engage with tangata whenua and iwi authorities in the development of the PDP and key issues raised through that process. Three pieces of feedback were received in relation to the Natural Features and Landscapes chapter. In summary the feedback identified:

- A lack of incentives to help create behaviour change.
- Minimal tangata whenua inclusion in identifying ONL and ONF, which were introduced by the NRC. The issue being that technical information will be required to support changes and this is likely to be costly in nature.

Section 3.4 above provided a summary of the key concerns and issues raised in hapū and iwi environmental management plans.

Section 5 of this report outlines how the proposed management approach responds to this advice in accordance with section 32(4A)(b) of the RMA.

4.4 Summary of resource management issues

Outstanding landscapes and features has been identified as a 'Significant Resource Management Issue' (**SRMI**) in the development of the PDP.

Outstanding landscapes and features

Council is required to protect the Far North's outstanding natural landscapes and features. There is a tension between this requirement and the need to provide landowners with the ability to develop. We need to protect outstanding natural landscapes and features from inappropriate subdivision, use and development. At the same time, we must enable Māori to benefit from their ancestral lands in ways that do not compromise features or landscapes that are deemed worthy of protection.

The following SRMI are also considered to be of relevance to the Natural Features and Landscapes chapter given in some circumstances their location in the coastal environment and on Māori land.

- Partnerships with tangata whenua; and
- Coastal management.

Based on the analysis of relevant context, current management approach, and feedback from consultation, the key resource management issues for Natural features and Landscapes to be addressed through the PDP are that:

- Appropriate measures are in place to ensure that subdivision, use and development do not adversely affect the characteristics and qualities of identified ONL and ONF.
- Appropriate protection is given to ONL and ONF inside and outside the coastal environment in accordance with the policy framework instructed by higher order statutory documents.
- Appropriate land use and activities are provided for within the provisions, while ensuring adequate protection for ONL and ONF.
- The characteristics and qualities of ONL and ONF in Māori Purpose zoned land and Treaty Settlement land need to be considered in terms of ancestral use of that land, given the lack of information currently afforded by the regional mapping project.
- Earthworks and indigenous vegetation clearance are managed to ensure it is only enabled in limited circumstances and is linked to other overlay provisions in the PDP to ensure protection. Noting that earthworks and indigenous vegetation clearance in this chapter is amenity related.

5 Proposed District Plan Provisions

The proposed provisions are set out in the Natural Features and Landscapes chapter of the PDP. These provisions should be referred to in conjunction with this evaluation report.

5.1 Strategic Objectives

The PDP includes a strategic direction section which is intended as high level direction for the PDP and guidance on how best to implement the Council's community outcomes set out in Far North 2100 and its Long Term Plan. The strategic objectives of direct relevance to the Natural Features and Landscapes chapter are:

Cultural prosperity:

- Objective 2: Te ao Māori, tikanga Māori and tangata whenua as kaitiaki, embedded in and integral to decision making.

Social prosperity:

- Objective 1: Community wellbeing is heightened by a sense of place.

Environmental prosperity:

- Objective 2: Collaborative relationships with iwi and hapū in order to support tangata whenua to carry out their obligation and responsibility as kaitiaki.
- Objective 6: The natural character of the coastal environment and outstanding natural features and landscapes are managed to ensure their long-term protection for future generations.

5.2 Proposed Management Approach

This section provides a summary of the proposed management approach for the Natural Features and Landscapes chapter focusing on the key changes from the ODP. The **Section 32 Overview Report** outlines and evaluates general differences between the PDP provisions and ODP, includes moving from an effects-based plan to a 'hybrid plan' that includes effects and activities-based provisions and an updated plan format and structure to align with the Planning Standards.

The main changes in the management approach for Natural Features and Landscapes are:

- A change in the management of ONL and ONF inside and outside the coastal environment. This stems from the Supreme Court’s King Salmon decision, which determines how policies are to be interpreted particularly where the word ‘avoid’ is used. The PDP will follow the two tier policy approach of the NZCPS and the RPS in terms of the level of protection required for ONL and ONF in the coastal environment.
- A mechanism to add or amend ONL and ONL on the PDP maps and schedule where accompanied by an assessment in accordance with the mapping methods and criteria in the PDP appendices and schedules.
- A strengthened level of protection for ONL and ONF than that currently afforded in the ODP, with more explicit direction in terms of what activities can and cannot occur within ONL and on ONF.
- A change in the management of plantation forestry as a result of the introduction of the NES-PF. The standard allows Council to set a higher restriction with respect to afforestation within an ONL or an ONF.
- A change in the approach to the rules as they relate to activities on ONF. This is in line with the approach taken for Auckland Council and more recently adopted by Whanagrei District Council in their district plan. The proposed provisions are more explicit in terms of listing activities that can or cannot occur on ONF where the ODP simply makes any application for development on an outstanding natural feature a discretionary activity.
- A change in the way Council provides for the enablement of the development and use of Māori land. The proposed provisions better recognise Council’s obligation to provide for the relationship Māori have with their ancestral lands. This is achieved both through identifying Māori Purpose and Treaty Settlement Land zones and through the proposed provisions in the Natural Features and Landscapes chapter by explicitly recognising the relationship Māori have with their ancestral lands form part of the characteristics and qualities of ONL and ONF.

The sections below provide a high-level summary of the objectives, policies, and rules and other methods for the Natural Features and Landscapes chapter.

5.3 Summary of proposed objectives and policies

This section provides a summary of the proposed objectives and provisions which are the focus of the section 32 evaluation in section 7 and 8 of this report.

5.3.1 Summary of objectives

The proposed management approach for the Natural Features and Landscapes chapter includes objectives that seeks to ensure the long term protection of the ONLs and ONFs, that ensures land use is consistent with the characteristics and qualities of these areas and ensures that the ancestral relationships tangata whenua have are recognised and provided for.

5.3.2 Summary of provisions

For the purposes of section 32 evaluations, ‘provisions’ are the *“policies, rules, or other methods that implement, or give effect to, the objectives of the proposed plan or change”*.

The proposed management approach for Natural Features and Landscapes chapter includes policies that:

- Enable the identification of ONL and ONF in accordance with mapping methods and criteria. This policy also recognises that the RPS has made provision for the mapped ONL and ONF to

be changed at any time (using the Schedule 1 process), provided any changes are consistent with the attributes and criteria listed in Appendix 1 of the RPS⁵.

- Applies a two tier approach to the protection of ONL and ONF inside and outside the coastal environment in accordance with the NZCPS and the RPS.
- Enable forms of primary production, where the use forms part of the values that established the landscape or feature. This recognises that these activities, where they existed at the time the ONL or ONF was identified, are appropriate and form part of the characteristics attributed to an ONL or ONF.
- Make provision for the consideration of ancestral use of Māori land in the identification of the characteristics and qualities that make up an ONL or ONF. The approach accepts that these relationships form part of the characteristics and qualities that contribute to the values of that land, regardless of whether they were recognised through the regional mapping project and listed in the NRC worksheets.
- Encourage restoration and enhancement of ONL and ONF.
- Prohibits land use that would result in the loss or destruction of ONL and ONF characteristics and qualities.
- Provides a list of relevant matters for consideration when applying for consent.

The proposed management approach for the Natural Features and Landscapes chapter includes rules and standards that:

- Enable limited buildings and structures, and extensions to lawfully established buildings and structures as a permitted activity. Otherwise, buildings and structures require consent as a discretionary or non-complying activity depending on whether they are located within the coastal environment.
- Enable the demolition of buildings and structures.
- Enable the repair and maintenance of legally established activities.
- Enable limited earthworks and indigenous vegetation clearance to support the repair and maintenance of legally established activities, powerlines, public health and safety, biosecurity and the sustainable non-commercial harvest of plant materials for Rongoa Māori.
- Provide for farming as a discretionary activity outside the coastal environment and make farming inside the Coastal Environment non-complying where existing use rights are not present.
- Provide for plantation forestry by way of consent where it is located outside of the coastal environment.
- Provide for the extension of quarries and mines by way of consent where they are located outside of the coastal environment.
- Apply non-complying activity status to new buildings and structures (excluding that ancillary to primary production inside the coastal environment).
- Prohibit new quarries, mining, land fill, managed fill and clean fill.
- Apply height limits to buildings or structures provided for within the rules.
- Apply colour and material standards for buildings and structures.
- Apply standards and thresholds for earthworks and indigenous vegetation clearance.

5.3.3 Responding to advice from iwi authorities

Section 32(4A) of the RMA requires evaluation reports to summarise advice received from iwi authorities on a proposed plan and the response to that advice, including any provisions that are intended to give effect to the advice. Section 4.3.2 of this report provides a summary of advice received from iwi authorities on the Natural Features and Landscapes chapter.

⁵ Regional Policy Statement for Northland 2016: Method 4.5.4(2)

Te Runanga O Ngāti Rēhia provided feedback on the Draft District Plan Natural Features and Landscapes chapter, which it supported in principle. In short Te Runanga O Ngāti Rēhia provided the following feedback:

- *Incentives need to be investigated and utilised to help create behaviour change.* It is not clear from the feedback what the incentives are needed for. ONL and ONF are protected in accordance with section 6 of the RMA and provisions within the PDP are considered appropriate and supported by a landscape architect. A non-statutory method may be sought to incentivise protection of ONL and ONF and could potentially be delivered through the Long Term Plan.
- *NFL-P5– this clause restricts Māori land and settlement land to activities that are consistent with the ancestral use of that land. This restricts the potential development opportunities of the land, opportunities that Māori have been marginalised from and unable to grow and develop their land to their benefit as other general landowners have. It needs to be open to use and develop the land in a way that meets the aspirations of the and holders without adverse effects on the natural features and landscapes.* Policy NFL-P5 was drafted to fill the gap that the RPS left in terms of understanding the cultural associations with landscapes. Where land use and subdivision is consistent with the ancestral use of that land and does not compromise any identified characteristics and qualities then it may be provided for. The provisions in this chapter have nothing to do with land tenure more the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development.

Te Runanga O Te Rarawa have provided the following feedback on the Draft District Plan Natural Features and Landscapes chapter:

- *Support Objective NFL-O3, retain the objective.* Acknowledged.
- *The cultural and spiritual wellbeing of a hapū and the relationship to the amenity values of an outstanding landscape or natural feature can be degraded by a development that is inappropriately sited or designed. The relationship of Māori cultural values associated with landscapes, especially in relation to wellbeing and mental health should be provided for. Objective NFL-O3 is not given effect through the accompanying policies and rules, in particular NFL-P8 (k) does not go far enough to protect tangata whenua relationships with the landscape. NFL-P1, NFL-P2 and NFL-P3 do offer protection of tangata whenua relationships through identification and avoidance of adverse effects on the characteristics and qualities, of which ancestral use is one of those characteristics and qualities. Further NFL-P8 has been redrafted to also have regard to the matters set out in policy TW-P6 on top of any historical, spiritual or cultural association held by tangata whenua.*
- *Add new Policy NFL-P9 as follows: NFL-P9 Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of land use and subdivision on the relationship of tangata whenua with the landscape.* Being that ancestral use is one of the characteristics and qualities in identifying or assessing a natural feature or landscape it is considered to be already addressed by NFL-P1, NFL-P2 and NFL-P3.
- *Ridgelines are not identified as outstanding natural features within the Plan. Ridges are prominent and highly visible features of the landscape and many have cultural significance (e.g., historic routes, territorial boundaries). For that reason, ridgelines should be protected from inappropriate development and subdivision. All ridgelines are not considered to be outstanding natural features as assessed by the subject matter expert who identified them. To be included evidence would need to be provided in accordance with the criteria for establishing them and then considered for inclusion. Ridgelines are however a consideration within NFL-S1 in terms of the height of buildings and structures.*

Kahukuraariki, Matauri X, Ngati Kuri, Ngai Takoto, Whaingaroa, Ngati Kuta, Te Aupori have provided the following feedback on the Draft District Plan Natural Features and Landscapes chapter:

- *These areas are typically assessed and categorized with minimal tangata whenua inclusion and could potentially be more actively participated within if the cultural landscape theme / thread so actively discussed in many Iwi / Hapu Environmental Plans were taken up. Unfortunately, the Regional Council has set these areas however, there may be opportunity for these to be questioned during the District Plan process. The issue here however is that technical information will be required to support changes, and this is likely to be costly in nature.* It is acknowledged that the regional mapping project did little to recognise spiritual and cultural values as well as ancestral use attributed to ONL and ONF. The provisions in the PDP recognise and acknowledge this by explicitly making provision for these considerations when applying for resource consent. It is also acknowledged that expert evidence will be required to amend the mapping currently applied to ONL and ONF, and there is a cost to that. The PDP also has to go through a full schedule 1 process and is a chance for landowners or submitters to make changes. As mentioned, changes will need to be supported by evidence in accordance with the methodology and assessment criteria.
- *Areas which may be 'outstanding' may also be traditional papakainga, nohoanga, cultural or customary areas. The Plan takes a broad brush approach in that essentially any typical built development undertaken requires resource consent. If it could be shown that areas were traditionally occupied there should be some permitted provisions which provide for the recognition of this historical association. This is particularly true when tangata whenua have had little involvement and inclusion in the mapping and categorisation of 'outstanding' areas and features.* It is acknowledged that the regional mapping project did little to recognise spiritual and cultural values as well as ancestral use attributed to ONL and ONF. The provisions in the PDP recognise and acknowledge this by explicitly making provision for these considerations when applying for resource consent. Policy NFL-P5 was drafted to fill the gap that the RPS left in terms of understanding the cultural associations with landscapes. Where land use and subdivision is consistent with the ancestral use of that land and does not compromise any identified characteristics and qualities then it may be provided for.

Ngati Kuta have provided the following feedback on the Draft District Plan Natural Features and Landscapes chapter:

- *It is noted that these areas are typically assessed and categorized with minimal tangata whenua inclusion and could potentially be more actively participated within if the cultural landscape theme / thread so actively discussed in many Iwi / Hapu Environmental Plans are included.* It is acknowledged that the regional mapping project did little to recognise spiritual and cultural values as well as ancestral use attributed to ONL and ONF. The provisions in the PDP recognise and acknowledge this by explicitly making provision for these considerations when applying for resource consent. The PDP also has to go through a full schedule 1 process and is a chance for landowners or submitters to make changes. Changes will need to be supported by evidence in accordance with the methodology and assessment criteria.
- *Retain NFL-O3, Tangata whenua input into Natural Features and Landscape have been minimal and this objective allows for their story to be told in areas mapped for other qualities.* It is acknowledged that the regional mapping project did little to recognise spiritual and cultural values as well as ancestral use attributed to ONL and ONF. The provisions in the PDP recognise and acknowledge this by explicitly making provision for these considerations when applying for resource consent.
- *Include a new objective which identifies and protects Cultural Landscapes that are found in the District.* The natural features and landscapes chapter addresses ONLs and ONFs, if a landscape or feature is deemed to be an ONL or ONF on cultural and spiritual grounds then it can be mapped and included.

- *Include a new Policy which considers effects on identified Cultural Landscapes. Rules would be those similar to those already found in the Section. The natural features and landscapes chapter addresses ONLs and ONFs, if a landscape or feature is deemed to be an ONL or ONF on cultural and spiritual grounds then it can be mapped and included.*

Te Runanga o Whaingaroa - Te Ukaipo have provided the following feedback on the Draft District Plan Natural Features and Landscapes chapter:

- *It is noted that these areas are typically assessed and categorized with minimal tangata whenua inclusion and could potentially be more actively participated within if the cultural landscape theme / thread so actively discussed in many Iwi / Hapu Environmental Plans are included. It is acknowledged that the regional mapping project did little to recognise spiritual and cultural values as well as ancestral use attributed to ONL and ONF. The provisions in the PDP recognise and acknowledge this by explicitly making provision for these considerations when applying for resource consent. The PDP also has to go through a full schedule 1 process and is a chance for landowners or submitters to make changes. Changes will need to be supported by evidence in accordance with the methodology and assessment criteria.*
- *Retain NFL-O3, Tangata whenua input into Natural Features and Landscape have been minimal and this objective allows for their story to be told in areas mapped for other qualities. It is acknowledged that the regional mapping project did little to recognise spiritual and cultural values as well as ancestral use attributed to ONL and ONF. The provisions in the PDP recognise and acknowledge this by explicitly making provision for these considerations when applying for resource consent.*
- *Include a new objective which identifies and protects Cultural Landscapes that are found in the District. The natural features and landscapes chapter addresses ONLs and ONFs, if a landscape or feature is deemed to be an ONL or ONF on cultural and spiritual grounds then it can be mapped and included.*
- *Include a new Policy which considers effects on identified Cultural Landscapes. Rules would be those similar to those already found in the Section. The natural features and landscapes chapter addresses ONLs and ONFs, if a landscape or feature is deemed to be an ONL or ONF on cultural and spiritual grounds then it can be mapped and included.*

6 Approach to Evaluation

6.1 Introduction

The overarching purpose of section 32 of the RMA is to ensure all proposed statements, standards, regulations, plans or changes are robust, evidence-based and are the most appropriate, efficient and effective means to achieve the purpose of the RMA. At a broad level, section 32 requires evaluation reports to:

- Examine whether the objectives in the proposal are the most appropriate to achieve the purpose of the RMA.
- Examine whether the provisions are the most appropriate way to achieve the objectives through identifying reasonably practicable options for achieving the objectives and assessing the efficiency and effectiveness of the provisions, including an assessment of environmental, economic, social and cultural benefits and costs.

These steps are important to ensure transparent and robust decision-making and to ensure stakeholders and decision-makers can understand the rationale for the proposal. There are also requirements in section 32(4A) of the RMA to summarise advice received from iwi authorities on the proposal and the response to that advice through the provisions.

6.2 Evaluation of scale and significance

Section 32(1)(c) of the RMA requires that evaluation reports contain a level of detail that corresponds with the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of this proposal. This step is important as it determines the level of detail required in the evaluation of objectives and provisions so that it is focused on key changes from the status quo.

The scale and significance of the environmental, economic, social and cultural effects of the provisions for the Natural Features and Landscapes chapter are evaluated in the table below.

Criteria	Comment	Assessment
Raises any principles of the Treaty of Waitangi	The principles of partnership, participation and protection have been taken into consideration in the drafting of the PDP provisions. Development within ONL and ONF has the potential to generate adverse environmental and cultural effects on a range of Section 6 RMA matters as outlined in Section 3.1 of this report. The potential for this however has been reduced with the strengthening of provisions, which are supported by the NZCPS where located within the coastal environment. It is also noted that other chapters in the PDP may apply on identified ONL and ONF which will afford further protection. It is acknowledged however that the provisions impact the ability for tangata whenua to undertake development on their land. The provisions aim to better recognise the ancestral relationships tangata whenua have with the land through specific provisions given the absence of such consideration through the mapping worksheets in the RPS.	Medium
Degree of change from the Operative Plan	Natural Features and Landscapes will be provided for in the PDP in the District-wide matters section, consistent with the District-wide provisions in the ODP. The extent to which identified ONL and ONF are marginally greater in the PDP. There is a shift in relation to the policy framework and management of ONL and ONF in the PDP as a result of case law, specifically the <i>'King Salmon'</i> decision. As a result, where ONL and ONF are located within the coastal environment adverse effects must be 'avoided'. Building thresholds as well as vegetation thresholds have decreased in the PDP to reflect the change in higher order policy direction. Amendments have also been made to reflect the Planning Standards and electronic plan format, as well as the required alignment with the RPS.	Medium
Effects on matters of	The protection of Natural Features and Landscapes are a matter of national importance.	Low

Criteria	Comment	Assessment
national importance	There are multiple matters in section 6 of the RMA that overlap in this PDP chapter. These matters and resultant overlays will ensure heightened protection and management where applicable. The provisions that relate to the Natural Features and Landscapes ensure the characteristics and qualities that are attributed to ONL and ONF are protected, and the effects are managed in accordance with higher order statutory documents.	
Scale of effects – geographically (local, district wide, regional, national).	The PDP approach generally rolls over that applied in the ODP with some additional restrictions applied to ensure the protection of the characteristics and qualities in alignment with the RPS direction. In particular where ONL and ONF are located in the coastal environment where adverse effects need to be avoided. The geographic extent of ONL and ONF in the PDP is only marginally greater than that in the ODP. Approximate one third of ONL are located on private land. In comparison approximately one half of ONF is on private land.	Low
Scale of people affected – current and future generations (how many will be affected – single landowners, multiple landowners, neighbourhoods, the public generally, future generations?).	The scale of people affected by the proposed changes will generally be limited to current and future landowners, and as stated the geographical extent of ONL and ONF has only increased marginally. The mapping of ONL and ONF is more recent than that currently applied in the ODP so is considered a more accurate reflection of these landscapes and features and covers approximately 22% of the district. While the provisions are more restrictive to ensure effect is given to higher order statutory documents, it will ensure appropriate protection to ensure these landscapes and features are protected for current and future generations.	Low
Scale of effects on those with specific interests, e.g., Tangata Whenua	As highlighted above the Natural Features and Landscapes provisions are more restrictive than those currently in the ODP. The changes proposed will be of interest to all landowners including tangata whenua. The ability to undertake development will likely be more difficult than it is currently, despite specific provisions being afforded to the consideration of cultural and ancestral use of Māori land. While the added protection is the result of high statutory direction, it will have an increased effect on landowners affected by ONL and ONF	Medium

Criteria	Comment	Assessment
	identified on their property.	
Degree of policy risk – does it involve effects that have been considered implicitly or explicitly by higher order documents? Does it involve effects addressed by other standards/commonly accepted best practice?	Overall, the PDP approach aligns with the Planning Standards and the RPS, with many of the changes attributed to the more recent mapping done for the RPS and its policy framework. Any assessment undertaken for Natural Features and Landscapes follows the same criteria as that within the RPS, making the approach consistent and easy to understand.	Low

6.3 Summary of scale and significance assessment

While the various matters are considered to be of medium significance, overall the scale and significance of the effects from the proposal is assessed as being low. Consequently, a low level of detail is appropriate for the evaluation of the objectives and provisions for the Natural Features and Landscapes chapter in accordance with section 32(1)(c) of the RMA. This evaluation focuses on key changes in the proposed management approach from the ODP - changes to reflect new national and regional policy direction are also included in the evaluation in section 7 and 8 below.

7 Evaluation of Objectives

Section 32(1)(a) of the RMA requires that the evaluation report examine the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA. The assessment of the appropriateness of the objectives for the Natural Features and Landscapes chapter is against four criteria to test different aspects of ‘appropriateness’ as outlined below.

Criteria	Assessment
Relevance	<ul style="list-style-type: none"> Is the objective directly related to a resource management issue? Is the objective focused on achieving the purpose of the RMA?
Usefulness	<ul style="list-style-type: none"> Will the objective help Council carry out its RMA functions? Does the objective provide clear direction to decision-makers?
Reasonableness	<ul style="list-style-type: none"> Can the objective be achieved without imposing unjustified high costs on Council, tangata whenua, stakeholders and the wider community?
Achievability	<ul style="list-style-type: none"> Can the objective be achieved by those responsible for implementation?

Section 32 of the RMA encourages a holistic approach to assessing objectives rather than necessarily looking each objective individually. This recognises that the objectives of a proposal generally work inter-dependently to achieve the purpose of the RMA. Where appropriate the objectives have been grouped in the evaluation below.

7.1 Evaluation of existing objectives

Objective(s):

12.1.3.1 To protect outstanding landscapes and natural features from inappropriate, subdivision use and development.

12.1.3.2 To protect the scientific and amenity values of outstanding natural features.

12.1.3.3 To recognise and provide for the distinctiveness, natural diversity and complexity of landscapes as far as practicable including the complexity found locally within landscapes and the diversity of landscapes across the District.

12.1.3.4 To avoid adverse effects and to encourage positive effects resulting from land use, subdivision or development in outstanding landscapes and natural features and Māori cultural values associated with landscapes.

Relevance	These objectives are relevant in that they generally address most key resource management issues. The objectives also generally address the matters in section 6 of the RMA with respect to the protection of ONL and ONF as well as Māori culture and traditions with their ancestral land.
Usefulness	While the objectives will help Council carry out its RMA functions the language used in the ODP is not entirely consistent with that used in the higher order statutory documents such as the NZCPS and the RPS. The term ‘outstanding landscape’ is not a term used elsewhere in the NZCPS and RPS, the correct term is ‘outstanding natural landscape’. This may create confusion as does not provide a clear direction for plan users or decision makers.
Reasonableness	Costs associated with implementation will be generated by the requirement to apply for consent (on any future developer) and monitoring (on Council). While 22% of land is identified as being ONL affecting a large portion of the district it is considered that the proposed objectives do not result in any un-justifiable costs, given the characteristics and qualities that need to be protected in ONL and ONF.
Achievability	It is considered that the objectives may struggle to achieve what they intend to given that language used is inconsistent with that used in the RMA and higher statutory documents, making implementation difficult.

Overall evaluation

The intent of these objectives is appropriate, however the language used is no longer appropriate or in line with the higher order statutory documents. Further, they do not go far enough to protect ONL and ONF where they are located in the coastal environment, nor do they provide for the ancestral relationship tangata whenua have with their land, particularly in terms of providing for those values as part of the recognised characteristics and qualities of an ONL or ONF.

7.2 Evaluation of proposed objectives

Objective:	
NFL-O1 ONL and ONF are identified and managed to ensure their long-term protection for current and future generations.	
NFL-O2 Land use and subdivision in ONL and ONF is consistent with and does not compromise the characteristics and qualities for that landscape or feature.	
Relevance	<p>Objectives NFL-O1, and NFL-O2 are directly related to achieving section 6(b) of the RMA, which states that protecting outstanding natural features and landscapes from inappropriate subdivision, use, and development is a matter of national importance.</p> <p>These objectives have been developed in cognisance with the environmental bottom lines set by NZCPS and RPS. These environmental bottom lines have been reinforced by case law and are considered appropriate in achieving the sustainable management purpose of the RMA (section 5) for the following reasons:</p> <p>The outcome sought in objective NFL-O1 is to identify and map ONL and ONF across the district. The process of mapping ONL and ONF has primarily been undertaken by the NRC through their regional mapping project and taken through the RMA Schedule 1 process for the RPS. Any changes to the identification and mapping of ONL and ONF</p>

	<p>will need to be undertaken by a suitably qualified professional which will include articulating the characteristics and qualities that are attributed to any landscape or feature identified. This will enable communities to understand what is being protected, why it is being protected and where it is being protected. This coupled with the more tailored management of ONL and ONF outlined in objective NFL-02 will enable their protection and meet the reasonably foreseeable needs of current and future generations in terms of these resources.</p> <p>The outcome sought in objective NFL-02 is to enable subdivision, use and development of ONL and ONF to provide for people and communities social, economic and cultural well-being where it is consistent and does not compromise the characteristics and qualities attributed to any given ONL or ONF. This requires broad consideration of the needs of landowners (including iwi), of those living adjacent to ONL and ONF, and the wider community. This objective is largely directed by the NZCPS and the RPS ensuring that the characteristics and qualities attributed to the landscape or feature are identified and appropriately assessed to understand what is inappropriate in terms of assessments of activities when consent is sought.</p> <p>The objectives address the SRMI identified in the PDP as they are ensuring that ONL and ONF are not compromised and ensure that development is consistent with the characteristics and qualities. They do provide for activities that have a lesser impact on these areas and apply either permitted activity status or allow for an assessment against the values and attributes of the particular area to determine whether they are compromised. This addresses the conflict between the requirement to manage and protect ONL and ONF from inappropriate use and development while providing landowners with an ability to develop their land.</p>
Usefulness	These objectives are useful in providing clear direction in terms of the identification and management of ONL and ONF and the outcome sought from doing so, further NFL-02 provides for development where the values and attributes are consistent. These objectives will help Council carry out its RMA functions and provide clear direction both to plan users and decision makers and help achieve the intended purpose of the chapter.
Reasonableness	Costs associated with implementation will be generate by the requirement to apply for consent (on any future developer) and monitoring (on Council). While 22% of land is identified as being ONL affecting a large portion of the district it is considered that the proposed objectives do not result in any un-justifiable costs, given the characteristics and qualities that need to be protected in ONL and ONF.
Achievability	It is considered that the objectives can be achieved, are consistent with higher order statutory documents and are sufficient to achieve the purpose of the RMA.
Overall evaluation	
<p>The objectives address the resource management issues relevant to the preservation and protection of ONL and ONF, while also providing for the consideration of land use activities where they are consistent with the characteristics and qualities of the ONL or ONF. The objectives have been developed in cognisance with the environmental bottom lines set by NZCPS and RPS. These environmental bottom lines have been reinforced by case law and are considered appropriate in achieving the sustainable management purpose of the RMA. The objectives set the outcomes anticipated in the chapter in a way that is consistent with the plan structure required by the Planning Standards.</p>	

Objective:	
NFL-03 The ancestral relationships Tangata Whenua has with the land is recognised and provided for as a part of the characteristics and qualities of ONL and ONF.	
Relevance	Objective NFL-03 addresses the relationship that Māori have with their ancestral land in accordance with Section 6(e) of the RMA through recognising and providing for

	<p>those ancestral relationships regardless of whether they have been identified on the RPS regional mapping project working sheets. Where Māori values are identified within the characteristics and qualities attributed to an ONL or an ONF then subdivision, use and development that is consistent with those values may be appropriate and may not incur an effect that is ‘adverse’, depending on other characteristics and qualities that have been identified for the landscape or feature.</p> <p>The outcome sought in objective NFL-03 is similar to that in objective NFL-02 in providing for people and communities social, economic and cultural well-being, only it is more specific to recognising and providing for the relationship that tangata whenua has with land that has been identified as an ONL or ONF.</p> <p>The objective addresses the SRMI identified in the PDP as it is both protecting ONL and ONF and fostering better partnerships with tangata whenua in respect of their connection with the land. Provision is made for an assessment against the values and attributes of the particular area to identify the contribution cultural values and ancestral use contributes to the characteristics and qualities of the landscape or feature. This addresses the conflict between the requirement to manage and protect ONL and ONF from inappropriate use and development while providing landowners with an ability to develop their land.</p>
Usefulness	The objective is useful in providing clear direction in terms of the importance of recognising the ancestral relationships Māori has with the land and solidifying that these relationships and values for part of the characteristics and qualities of ONL and ONF. This objective will help Council carry out its RMA functions and provide clear direction both to plan users and decision makers and help achieve the intended purpose of the chapter.
Reasonableness	Costs associated with implementation will be generate by the requirement to apply for consent (on any future developer) and monitoring (on Council). While 22% of land is identified as being ONL affecting a large portion of the district it is considered that the proposed objectives do not result in any un-justifiable costs, given the characteristics and qualities that need to be protected in ONL and ONF.
Achievability	It is considered that the objective can be achieved, is consistent with higher order statutory documents and are sufficient to achieve the purpose of the RMA.
Overall evaluation	
<p>The objective addresses the resource management issues relevant to the preservation and protection of ONL and ONF, while also providing for the consideration of cultural or ancestral use of Māori land in the consideration of landscape and features characteristics and qualities. The objectives have been developed in cognisance with the environmental bottom lines set by NZCPS and RPS. These environmental bottom lines have been reinforced by case law and are considered appropriate in achieving the sustainable management purpose of the RMA. The objectives set the outcomes anticipated in the chapter in a way that is consistent with the plan structure required by the Planning Standards.</p>	

8 Evaluation of Provisions to Achieve the Objectives

8.1 Introduction

Section 32(1)(b) of the RMA requires the evaluation report to examine whether the provisions are the most appropriate way to achieve the objectives by:

- (i) *identifying other reasonably practicable options for achieving the objectives; and*
- (ii) *assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
- (iii) *summarising the reasons for deciding on the provisions.*

When assessing the efficiency and effectiveness of the provisions in achieving the objectives, section 32(2) of the RMA requires that the assessment:

(a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—

(i) economic growth that are anticipated to be provided or reduced; and

(ii) employment that are anticipated to be provided or reduced; and

(b) if practicable, quantify the benefits and costs referred to in paragraph (a); and

(c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

This section provides an assessment of reasonably practicable options and associated provisions (policies, rules and standards) for achieving the objectives in accordance with these requirements. This assessment of options is focused on the key changes from the status quo as outlined in the 'proposed management approach' in 5.2 of this report.

Each option is assessed in terms of the benefits, costs, and effectiveness and efficiency of the provisions, along with the risks of not acting or acting when information is uncertain or insufficient. For the purposes of this assessment:

- **effectiveness** assesses how successful the provisions are likely to be in achieving the objectives and addressing the identified issues
- **efficiency** measures whether the provisions will be likely to achieve the objectives at the least cost or highest net benefit to society.

The sections below provide an assessment of options (and associated provisions) for achieving the objectives in accordance with sections 32(1)(b) and 32(2) of the RMA.

8.2 Quantification of benefits and costs

Section 32(2)(b) of the RMA requires that, where practicable, the benefits and costs (environmental, economic, social and cultural) of a proposal are quantified. The requirement to quantify benefits and costs where practicable recognises it is often difficult and, in some cases, inappropriate to quantify certain costs and benefits through section 32 evaluations, particularly those relating to non-market values.

As discussed in 6.2, the scale and significance of the effects of proposed changes for the Natural Features and Landscapes chapter are generally assessed as being low. Therefore, exact quantification of the benefits and costs of the different options to achieve the objectives is not considered to be necessary or practicable for this topic. Rather this evaluation focuses on providing a qualitative assessment of the environmental, economic, social and cultural benefits and costs anticipated from the provisions with some indicative quantitative benefits and costs provided where practicable.

8.3 Evaluation of options

8.3.1 Option 1: Status quo

<i>Option 1: The status quo, retain the existing provisions from the ODP.</i>		
Benefits	Costs	Risk of acting / not acting
<ul style="list-style-type: none"> • The public and practitioners are aware of the existing spatial extent of Outstanding Landscapes, Outstanding Landscape Features and ONF in the district and are familiar with the provisions in the Operative Far North District Plan applied to their protection. • A number of non-statutory methods are identified to educate and encourage the protection of Outstanding Landscapes, Outstanding Landscape Features and ONF. • Permanent protection may be afforded through the current incentive of development bonuses. • The sustainable harvesting of indigenous plant material for rongoa Māori (customary medicine) is provided for as a permitted activity. • The ODP provisions are less restrictive, which may allow for greater flexibility for development, particularly in the coastal environment. <p><u>Economic growth and employment opportunities</u> As this approach is the status quo, there is no economic growth anticipated from this approach.</p>	<ul style="list-style-type: none"> • The language used in the operative Far North District Plan is inconsistent with the language used in section 6 of the RMA. This may cause confusion and/or weaken the ability to protect Outstanding Landscapes, Outstanding Landscape Features as matters of national importance, which in turn will likely incur adverse effects on the environment. • The provisions do not give effect to Policy 15 in the NZCPS or the direction in the RPS. • Relies on old identification and mapping work undertaken 25 years ago. The methodology for mapping ONL and ONF has been updated, as have the tests for protection. Existing mapping is now considered less relevant and not best practice. • The policy framework is not fit for purpose. It would likely result in applications being accepted where they would not normally under the new two-tier hierarchy of protection inside and outside the coastal environment required through the RPS. • Would apply unnecessary assessment and consenting costs for those who are no longer considered affected by an ONL or ONF in the 	<ul style="list-style-type: none"> • There is sufficient information provided through the RPS to apply the more recent mapping of ONL in the Far North District. Council has sufficient information to map ONF through the information provided by the NRC and through the more detailed review of specific sites undertaken in 2016. • There is a risk to Council, in terms of likely legal challenge, if the provisions in the PDP do not give effect to the NZCPS and RPS. • The terms Outstanding Landscapes and Outstanding Landscape Features used in the operative Far North District Plan are inconsistent with the language used in section 6 of the RMA, the NZCPS and the RPS. • There is a likelihood that adverse environmental effects will result from the current operative district plan provisions. This is an issue particularly in the coastal environment where the test in the RPS is to avoid adverse effects, resulting in the characteristics and qualities being eroded. • There is a risk that the time period for progressing the district plan review would be substantially drawn out due to litigation and

	<p>RPS.</p> <ul style="list-style-type: none"> • Likely to result in the loss of potential areas of ONL over time as the protection framework is not as strong as that required by the higher order statutory documents. • There are likely costs associated with defending provisions that are no longer relevant and are easily challenged through hearings and the Environment Court. 	<p>further revision.</p> <ul style="list-style-type: none"> • There is a high risk of public and ratepayer dissatisfaction if Council was found to be knowingly negligent and taken to court for its failure to comply with its statutory responsibilities.
<p><u>Effectiveness</u></p> <ul style="list-style-type: none"> • Retaining the existing approach would unlikely achieve the outcomes sought for the protection of ONL and ONF. If notified, the provisions will not give effect to national and RPS and are vulnerable to challenge in the Council hearing and the Environment Court. • There would be an inconsistent application and protection of ONL and ONF across the Northland Region. • Uncertainty would be created for applicants where there is inconsistency with the mapping of ONL and ONF in the District Plan and the RPS. • The current approach does not consider or give effect to the changes in national and regional direction through the NZCPS and RPS. • The current provisions rely on an out-dated assessment and mapping information, some of which dates back to 1995. 	<p><u>Efficiency</u></p> <ul style="list-style-type: none"> • Option 1 is not considered to be the most efficient approach. The PDP is required to give effect to the NZCPS and the RPS, which includes adopting the protection mechanisms promoted in these documents. 	
<p><u>Overall evaluation</u></p> <p>On balance this option is not considered to be the most appropriate option to achieve the objectives because:</p> <ul style="list-style-type: none"> • This option does not align and give effect to the changes in higher order national and regional statutory documents. • The mapping of ONL and ONF in the operative district plan does not align with the mapping undertaken as part of the NRC regional mapping project. • There is insufficient protection afforded to ONL and ONF that are located within the coastal environment. • There is little comfort that adverse effects can be avoided, in accordance with higher order statutory documents and interpretation of case law. 		

8.3.2 Option 2: Non-regulatory approach

Option 2: This approach relies on tools such as guidelines, education and incentives to protect ONL and ONF from inappropriate subdivision, use and development.		
Benefits	Costs	Risk of acting / not acting
<ul style="list-style-type: none"> Enabling for all landowners with ONL and on ONF identified on their properties to undertake land use and subdivision, in terms of the District Plan. <p><u>Economic growth and employment opportunities</u> Non regulatory provisions will generally be less restrictive and may allow for development to occur more easily, which may improve opportunities for a range of economic growth activities.</p> <p>Conversely, the characteristics and qualities identified for ONL and ONF generally sustain tourism and subsequent employment opportunities. These characteristics and qualities have the potential to be adversely affected through development that does not appropriately consider the values attributed to the landscape or feature.</p>	<ul style="list-style-type: none"> There is a high likelihood that this method will not achieve the purpose of the RMA, in particular the protection from inappropriate subdivision, use and development. Will not deliver a set of plan provisions responding to the direction given in the higher order statutory documents, particularly the NZCPS and the RPS. There is a high likelihood that adverse environmental effects will be incurred. Potential loss of ONL and ONF for the general public to utilise and enjoy. Potential loss of tourism through inappropriate land use and subdivision on ONL and ONF. Potential loss of cultural values, particularly where characteristics and qualities associated with Māori values are not identified in the RPS worksheets. Highly vulnerable to challenge and there will be costs associated with challenge in the Council hearing and the Environment Court. 	<ul style="list-style-type: none"> There is a risk to Council and to the integrity of the provisions should the PDP not give effect to the NZCPS and RPS. There is a high likelihood of legal challenge. There is a high risk that adverse environmental effects will result from non-statutory provisions. This is of particular relevance to the coastal environment. There is a risk that the time period for progressing the district plan review would be substantially drawn out due to litigation and further revision. There is a risk that subdivision, use and development may not be able to consider the policy framework, resulting in the values attributed to landscapes or features being eroded, including those of cultural significance. There is a high risk of public and ratepayer dissatisfaction if council was found to be knowingly negligent and taken to court for its failure to comply with its statutory responsibilities.
<p><u>Effectiveness</u></p> <ul style="list-style-type: none"> Relying on non-statutory methods will be highly vulnerable to challenge in the Council hearing and the Environment Court. This method would apply an inconsistent application and protection of ONL and ONF across the Region. There is no legal obligation to adhere to non-statutory methods. 	<p><u>Efficiency</u></p> <ul style="list-style-type: none"> Option 2 is not considered to be the most efficient approach. The PDP is required to give effect to the NZCPS and the RPS, which includes adopting the protection mechanisms promoted in these documents. A non-regulatory approach is not considered efficient in achieving this. 	

<ul style="list-style-type: none"> • Does not consider or give effect to the changes in national and regional direction through the NZCPS and RPS. • The provisions will not be able to achieve the stated objectives for the PDP. • There is no certainty for the protection of ONL and ONF. • The proposed provisions will achieve the stated objectives and represent the most appropriate level of protection afforded by higher order statutory documents and case law. 	
<p>Overall evaluation</p> <p>On balance this option is not considered to be the most appropriate option to achieve the objective because:</p> <ul style="list-style-type: none"> • This option does not align and give effect to the changes in national and regional higher order statutory documents. • There is insufficient protection afforded to ONL and ONF that are located within the coastal environment. • There is little comfort that adverse effects can be avoided, in accordance with higher order statutory documents and interpretation of case law. 	

8.3.3 Option 3: Natural Features and Landscapes chapter - Proposed approach

<p>Option 3: Proposed approach. Greater restriction on subdivision and lands use, providing for the two tier approach to the enablement and protection of ONL and ONF within and outside the coastal environment in accordance with the policy direction in the NZCPS and the RPS.</p>		
Benefits	Costs	Risk of acting / not acting
<ul style="list-style-type: none"> • Delivers a set of plan provisions and controls that respond to the direction given in the higher order statutory documents, particularly the NZCPS and the RPS. • The language and use of terminology are consistent with section 6 of the RMA and also that used in the higher order statutory documents. • The methodology for identifying and assessing ONL and ONF in the RPS is consistent and has been through a recent Schedule 1 RMA statutory process for the RPS. • Greater certainty of outcomes for the management and protection of ONL and ONF inside and outside the coastal environment is provided with less likelihood of adverse effects being incurred, particularly within the coastal environment. 	<ul style="list-style-type: none"> • There will be limited need for in-house or contracted research to identify and map ONL and ONF across the district as this work, for the most part, has already been done through the RPS. • Costs may be incurred where there are requests to change identified ONL and ONF through method 4.5.4 of the RPS. • Additional plan complexity is required through the need to distinguish between ONL and ONF where they are located within or outside the coastal environment. May result in confusion, particularly where the difference is applied to the same ONL or ONF. • The risk of incurring any costs associated with 	<ul style="list-style-type: none"> • It is considered that there is sufficient information available to act as proposed. The ONL and ONF identified in the RPS have been through a recent Schedule 1 RMA statutory process. • There is a low level of risk that inappropriate adverse effects on the environment will be incurred as the provisions are prescriptive and give effect to the necessary higher order statutory documents. • The lack of cultural values expressed through the RPS worksheets have been addressed through the policy framework proposed, allowing the ancestral use of Māori land to be considered as part of the characteristics and

<ul style="list-style-type: none"> • The high level of protection for ONL and ONF ensures these areas are protected for the public to enjoy for current and future generations. • Greater certainty for landowners as the mapping will be consistent with the RPS and specific activities are identified. • Positive effects likely delivered for tourism ventures that rely on the characteristics and qualities of ONL and ONF being protected. Provisions also provide for their restoration and enhancement. • Provision is made for the consideration and recognition of ancestral relationships where these are not necessarily identified through the characteristics and qualities of ONL or ONF. • More specificity in terms of what buildings and activities can be undertaken within ONL and ONF because of the hybrid PDP approach. <p><u>Economic growth and employment opportunities</u></p> <p>There may be a perception that the provisions negatively impact economic growth and employment in terms of restricted development within ONL and on ONF, particularly where located within the coastal environment.</p> <p>While the extent of ONL represent a significant portion of total land area across the Far North District (approximately 22% of all land), approximately 68% of that land is in public ownership.</p> <p>There may be economic opportunities for Māori where there is an ancestral relationship recognised on that land that forms part of the characteristics and qualities of that landscape or feature.</p> <p>The characteristics and qualities of ONL and ONF sustain tourism opportunities and have the potential to enhance the economic wellbeing of the District.</p>	<p>challenges to the PDP is reduced given the higher order statutory direction.</p> <ul style="list-style-type: none"> • Potentially additional costs and complexity to justify subdivision, use and development affecting ONL and ONF where located within the coastal environment. It may be that the threshold of no adverse effects cannot be met. 	<p>qualities.</p>
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Effectiveness

- The proposed rules and standards are effective as they recognise and provide appropriate protection of ONL and ONF.
- Provisions that give effect to national and regional direction will ensure the PDP is robust and less vulnerable to challenge in the Council hearing and later in the Environment Court.
- There is greater consistency with how other Councils approach the protection of ONL and ONF in the Region.
- The identification of ONL and ONF has been refined through the work undertaken for the RPS and represents the most up to date mapping and assessment of ONL and ONF in the District.
- The proposed provisions will achieve the stated objectives and represent the most appropriate level of protection afforded by higher order statutory documents and case law.

Efficiency

- Option 3 is considered to be an efficient method of achieving the PDP Natural features and landscape objectives. The PDP is required to give effect to the NZCPS and the RPS, which includes adopting the protection mechanisms promoted in these documents. The provisions proposed are considered to do that efficiently.

Overall evaluation

On balance this option is considered to be the most appropriate option to achieve the objective because:

- They give effect to the changes in national and regional higher order statutory documents.
- ONL and ONF are updated to reflect those now recognised in the RPS and the further work done by the Far North District Council.
- There is appropriate protection afforded to ONL and ONF where they are located within the coastal environment to ensure that adverse effects can be avoided, in accordance with higher order statutory documents and interpretation of case law.

9 Summary

An evaluation of the proposed objectives and provisions for the Natural Features and Landscapes chapter has been carried out in accordance with section 32 of the RMA. This evaluation has concluded that the objectives are the most appropriate way to achieve the purpose of the RMA and the provisions are the most appropriate way to achieve the objectives for the following reasons:

- The Natural Features and Landscapes objective gives effect to Part 2 of the RMA and the relevant National and RPS policy direction.
- The Natural Features and Landscapes provisions combined with Overlays will ensure amenity values and qualities of surrounding environments are maintained with appropriate rules and standards that apply to ONL and ONF inside and outside the coastal environment.
- The Natural Features and Landscapes provisions will provide for an appropriate level of earthworks, indigenous vegetation clearance and development within ONL and ONF.
- Prohibited activity status is applied to activities that would result in any loss of and/or destruction of the characteristics and qualities of ONL and ONF.
- Where compliance cannot be achieved, resource consent as a discretionary or non-complying activity is required. This will ensure a suitable level of scrutiny can be applied when resource consent is sought for activities.

Overall, it is considered that the proposed provisions are the most appropriate given that the benefits outweigh the costs, and there are considerable efficiencies to be gained from adopting the preferred provisions.

10 Appendices

10.1 Appendix 1 - Coastal Environment, Outstanding and High Natural Character Areas Outstanding Natural Landscapes Report – Melean Absolum Limited Landscape Architects

10.2 Appendix 2 - Outstanding Natural Features: Identifying and Mapping sites in Far North District Council: Methodology Report
- Bruce W Hayward FRSNZ PhD: May 2016

10.3 Appendix 3 - NRC Mapping worksheets and methodology

[Mapping worksheets and methodology - Northland Regional Council \(nrc.govt.nz\)](https://www.nrc.govt.nz/mapping-worksheets-and-methodology)