



SECTION 42A REPORT

Strategic Direction

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Appendix 1: Recommended amendments to Strategic Direction chapter

Appendix 2: Recommended decisions on submissions to Strategic Direction chapter

List of Abbreviations

Submitters

Submitter Number	Abbreviation	Full Name of Submitter
S364	DOC	Director-General of Conservation (Department of Conservation)
S512	FENZ	Fire and Emergency New Zealand
S363	Foodstuffs	Foodstuffs North Island Limited
S159	Horticulture NZ	Horticulture New Zealand
S561	Kāinga Ora	Kāinga Ora Homes and Communities
S138	Kairos Connection Trust	Kairos Connection Trust and Habitat for Humanity Northern Region Ltd
S389	Taituha, Tane & Apiata	Merata Kawharu Taituha, Renata Tane, Albie Apiata, Billie Taituha and Hirini Tane
S331	MOE	Ministry of Education Te Tāhuhu o Te Mātauranga
S421	Federated Farmers	Northland Federated Farmers of New Zealand
S359	NRC	Northland Regional Council
S344	Paihia Properties	Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd
S425	Twin Coast Cycle Trail	Pou Herenga Tai Twin Coast Cycle Trail Charitable Trust
S489	RNZ	Radio New Zealand
S511	Forest & Bird	Royal Forest and Bird Protection Society of New Zealand
S521	VKK	Vision Kerikeri (Vision for Kerikeri and Environs, VKK)
S356	NZTA	Waka Kotahi NZ Transport Agency
S360	Waste Management	Waste Management NZ Limited

Others

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



1 Executive summary

1. The Far North Proposed District Plan (“PDP”) was publicly notified in July 2022. The Strategic Direction Chapter is located in Part 2 – District-Wide Matters section of the PDP.
2. 63 original submitters (with 321 individual submission points) and 223 further submitters (with 850 individual submission points) were received on the Strategic Direction topic. 131 original submission points indicated general support for the provisions to be retained as notified, 133 submission points indicated support in part, with changes requested, whilst 25 submission points opposed the provisions.
3. The submissions can largely be categorised into several key themes:
 - Considerations of higher order documents
 - Reverse sensitivity and ‘adverse effects’
 - Importance of climate change
 - Urban design considerations
 - Objectives being inclusive of all ‘issues’
 - Objectives having subsequent policies
4. This report has been prepared in accordance with Section 42A of the Resource Management Act (“RMA”) and outlines recommendations in response to the issues raised in submissions. This report is intended to both assist the Hearings Panel to make decisions on the submissions and further submissions on the PDP and also provide submitters with an opportunity to see how their submissions have been evaluated, and to see the recommendations made by officers prior to the hearing.
5. The key changes recommended in this report relate to:
 - Amendments to an objective to include additional infrastructure
 - Minor edits for consistency and clarity.
 - Provision renaming.

2 Introduction

2.1 Author and qualifications

6. My full name is Tammy Wooster, and I am the Integrated Planning Department Manager at Far North District Council. This department is made up of the District Plan and Growth Planning and Placemaking Teams. Therefore, I am the manager responsible for the development of Proposed District Plan and the Council Spatial and Placemaking plans.



7. I hold the qualifications of a Bachelor of Business Studies from Waikato University, Hamilton and a Master of Resource and Environment Planning from Massey University, Palmerston North, New Zealand. I am a full member of the New Zealand Planning Institute.
8. I have 17 years experience in planning and resource management including policy development, formation of plan changes and associated s.32 assessments; s.42A report preparation and associated evidence. I have also written submissions on both local and central government planning documents / legislation. I have participated in Environment Court mediation and prepared Environment Court evidence. I have processed resource consent applications and have experience in developing spatial and placemaking plans.

2.2 Code of Conduct

9. I confirm that I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 and that I have complied with it when preparing this report. Other than when I state that I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
10. I am authorised to give this evidence on the Council's behalf to the Proposed District Plan hearings commissioners ("Hearings Panel").

3 Scope/Purpose of Report

11. This report has been prepared in accordance with Section 42A of the Resource Management Act to:
 - assist the Hearings Panel in making their decisions on the submissions and further submissions on the Proposed District Plan; and
 - provide submitters with an opportunity to see how their submissions have been evaluated and the recommendations being made by officers, prior to the hearing.
12. This report responds to submissions on Strategic Direction. Submissions on the strategic direction objectives and other submissions which relate to other plan wide topics more generally, these are included in Section 5.2.9.
13. Wherever possible, I have provided a recommendation to assist the Hearings Panel.

4 Statutory Requirements

4.1 Statutory documents

14. I note that the Overview Section 32 report provides detail of the relevant statutory considerations applicable to the Strategic direction. As the



Strategic direction chapter largely covers the whole plan, greater detail can be found in the relevant section 32 report.

15. It is not necessary to repeat the detail of the relevant RMA sections and full suite of higher order documents here. Consequently, no further assessment of these documents has been undertaken for the purposes of this report
16. However, it is important to highlight the higher order documents which have been subject to change since notification of the Proposed Plan which must be given effect to. Those that are relevant to the Strategic Direction Chapter are discussed in 4.1.1 below

4.1.1 Resource Management Act

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

4.1.2 National Policy Statements

4.1.2.1 National Policy Statements Gazetted since Notification of the PDP

18. The PDP was prepared to give effect to the National Policy Statements that were in effect at the time of notification (27 July 2022). This section provides a summary of the National Policy Statements, relevant to Strategic Direction that have been gazetted since notification of the PDP. As District Plans must be "prepared in accordance with" and "give effect to" a National Policy Statement, the implications of the relevant National Policy Statements on the PDP must be considered.
19. The National Policy Statement for Indigenous Biodiversity (NPS-IB) took effect on 4 August 2023. This was after the PDP was notified (27 July 2022), but while it was open for submissions. The objective of the NPS-IB is to maintain indigenous biodiversity so there is at least no overall loss in indigenous biodiversity. The objective is supported by 17 policies. These include Policy 1 and Policy 2 relating to the principles of the Treaty of Waitangi and the exercise of kaitiakitanga by tangata whenua in their rohe.
20. The National Policy Statement for Highly Productive Land (NPS-HPL) took effect on 17 October 2022, The NPS-HPL has a single objective: Highly productive land is protected for use in land-based primary production,



both now and for future generations. The objective is supported by nine policies and a set of implementation requirements setting out what local authorities must do to give effect to the objective and policies of the NPS-HPL, including restrictions on the urban rezoning, rural lifestyle rezoning, and subdivision of highly productive land and requirements to protect highly productive land from inappropriate use and development.

4.1.2.2 National Policy Statements – Announced Future Changes

21. In October 2023 there was a change in government and several announcements have been made regarding work being done to amend or replace various National Policy Statements (summarised in **Table 1** below). The below NPS are of general relevance to the submissions received on the Strategic Direction topic.

Table 1 Summary of announced future changes to National Policy Direction (as indicated by current Government, as at March 2024)

National Statement	Policy	Summary of announced future changes	Indicative Timing
National Policy Statement for Freshwater Management (NPS-FM)		<ul style="list-style-type: none"> Changes to hierarchy of obligations in Te Mana o Te Wai provisions Amendments to NPS-FM, which will include a robust and full consultation process with all stakeholders including iwi and the public 	<p>End of 2024</p> <p>2024 - 2026</p>
National Policy Statement on Indigenous Biodiversity (NPS-IB)		<ul style="list-style-type: none"> Amendments to the NPS-IB Work to stop/cease implementation of new Significant Natural Areas 	2025 - 2026
National Policy Statement for Urban Development (NPS-UD)		<ul style="list-style-type: none"> Amendments to NPS-UD, including requirements for Tier 1 and 2 Council to 'live zone' enough land for 30 years of housing growth, and making it easier for mixed use zoning around transport nodes. 	By end of 2024
National Policy Statement for Renewable Electricity Generation (NPS-REG)		<ul style="list-style-type: none"> Amendments to NPS-REG, to allow renewable energy production to be doubled 	By end of 2024
National Policy Statement for Electricity Transmission (NPS-ET)		<ul style="list-style-type: none"> Amendments to NPS-ET, but at this stage direction and amendments are unclear. 	By end of 2024
National Policy Statement for Highly Productive Land (NPS-HPL)		<ul style="list-style-type: none"> Amendments to the NPS-HPL in light of needing to enable housing growth and remove consenting barriers. Possible amendments to the definition of 'Highly Productive Land' to enable more flexibility 	2024 - 2025



National Statement	Policy	Summary of announced future changes	Indicative Timing
Proposed National Policy Statement for Natural Hazards (NPS-NH)		<ul style="list-style-type: none"> No update on progress has been provided by current government. 	Unknown

4.2 Council's Response to Current Statutory Context

22. The evaluation of submissions and recommendations in this report are based on the current statutory context (that is, giving effect to the current National Policy Statements). I note that the proposed amendments and replacement National Policy Statements do not have legal effect until they are adopted by Government and formally gazetted.
23. Sections 55(2A) to (2D) of the RMA sets out the process for changing District Plans to give effect to National Policy Statements. A council must amend its District Plan to include specific objectives and policies or to give effect to specific objectives and policies in a National Policy Statement if it so directs. Where a direction is made under Section 55(2), Councils must directly insert any objectives and policies without using the Schedule 1 process, and must publicly notify the changes within five working days of making them. Any further changes required must be done through the RMA schedule 1 process (such as changing rules to give effect to a National Policy Statement).
24. Where there is no direction in the National Policy Statement under Section 55(2), the Council must amend its District Plan to give effect to the National Policy Statement using the RMA schedule 1 process. The amendments must be made as soon as practicable, unless the National Policy Statement specifies a timeframe. For example, changes can be made by way of a Council recommendation and decision in response to submissions, if the submissions provide sufficient 'scope' to incorporate changes to give effect to the National Policy Statements.
25. I have been mindful of this when making my recommendations and believe the changes I have recommended are either within scope of the powers prescribed under Section 55 of the RMA or within the scope of relief sought in submissions.

4.2.1 National Planning Standards

26. The National Planning Standards determine the sections that should be included in a District Plan, including the Strategic Direction chapters, and how the District Plan should be ordered. The Strategic Direction provisions proposed and recommended in this report follow this guidance.

4.2.2 Treaty Settlements



27. There have been no further Deeds of Settlement signed to settle historic Treaty of Waitangi Claims against the Crown, in the Far North District, since the notification of the PDP.

4.2.3 Iwi Management Plans – Update

28. Ngā Tikanga mo te Taiao o Ngāti Hine' the Ngāti Hine Environmental Management Plan was in draft form at the time of the notification of the PDP. This was updated, finalised and lodged with the Council in 2022, after notification of the PDP in July 2022. In respect of the Strategic Direction Chapter the Ngāti Hine Environmental Management Plan provides the following direction:

- To protect sites of significance from any threats of damage
- Restoration enhancement and management of indigenous flora and fauna
- Indigenous ecosystems are protected and functions restored and maintained
- Responsiveness to climate change
- Planning initiatives which will ensure that development of urban centres is in a manner and at a rate which ensures adequate infrastructure is in place before development occurs
- Urban areas design/ low impact design and innovation

29. The Ahipara Takiwā Environmental Management Plan was in draft form at the time of the notification of the PDP. This was updated, finalised and lodged with Council in 2023, after notification of the PDP in July 2022. In respect of the Strategic Direction, the Environmental Management Plan provides direction in relation to the following:

- Biodiversity and ecosystem management, cultural access, public access to waterways, rivers, foreshores, seabed and moana, mining and quarrying (remediation) climate change.

30. The range of relevant issues, objectives and policies are covered by a variety of submitters, which have been addressed in this report and will be further addressed in detail by the topic and zone chapters.

4.3 Section 32AA evaluation

31. This report uses 'key issues' to group, consider and provide reasons for the recommended decisions on similar matters raised in submissions. Where changes to the provisions of the PDP are recommended, these have been evaluated in accordance with Section 32AA of the RMA.
32. The s32AA further evaluation for each key issue considers:



- Whether the amended objectives are the best way to achieve the purpose of the RMA.
 - The reasonably practicable options for achieving those objectives.
 - The environmental, social, economic and cultural benefits and costs of the amended provisions.
 - The efficiency and effectiveness of the provisions for achieving the objectives.
 - The risk of acting or not acting where there is uncertain or insufficient information about the provisions.
33. The s32AA further evaluation contains a level of detail that corresponds to the scale and significance of the anticipated effects of the changes that have been made. Recommendations on editorial, minor and consequential changes that improve the effectiveness of provisions without changing the policy approach are not re-evaluated.

4.4 Procedural matters

34. Due to the clarity of submissions, no correspondence or meetings with submitters needed to be undertaken and there are no procedural matters to consider for this hearing.

5 Consideration of submissions received

5.1 Overview of submissions received

35. A total of 321 original submissions and 825 further submissions were received on the Strategic Direction Chapter.
36. The main submissions on the Strategic Direction Chapter came from:
- Iwi and Hapu groups – who have interests in climate change, growth and the environment
 - Kāinga Ora Homes and Communities (Kāinga Ora) - who largely seek higher density provisions
 - Northland Federated Farmers of New Zealand (Federated Farmers) – Predominantly seek changes to enable and protect primary production
 - Horticulture New Zealand (Horticulture NZ) – seek recognition of Highly productive land
 - Community interest groups - who primarily have an interest in climate change, open space and urban design
 - Network utility providers – who seek provisions around regionally significant infrastructure



- Forestry Groups – Promote forestry as a key Far North industry
- Private Landowners – who request clear direction for growth
- Retirement villages – Seek the need for provisions to recognise and enable housing and care for the ageing population.
- Government agencies / departments – who have a key interest in infrastructure, wellbeing and health and safety.
- Royal Forest and Bird Protection Society of New Zealand (Forest & Bird) – who have a key interest in indigenous biodiversity.

37. The key issues identified in this report are set out below:

- Key Issue 1: Overview (s)
- Key Issue 2: Historic and Cultural Wellbeing
- Key Issue 3: Economic and Social Wellbeing – Social Prosperity
- Key Issue 4: Economic and Social Wellbeing – Economic Prosperity
- Key Issue 5: Urban Form and Development
- Key Issue 6: Infrastructure and Electricity
- Key Issue 7: Rural Environment
- Key Issue 8: Natural Environment
- Key Issue 9: Other Submissions

38. Section 5.2 constitutes the main body of the report and considers and provides recommendations on the decisions requested in submissions. Due to the large number of submissions received and the repetition of issues, as noted above, it is not efficient to respond to each individual submission point raised in the submissions. Instead, this part of the report groups similar submission points together under key issues. This thematic response assists in providing a concise response to, and recommended decision on, submission points.

5.2 Officer Recommendations

39. A copy of the recommended plan provisions for the Strategic Direction chapter is provided in **Appendix 1 – Recommended provisions to this report.**
40. A full list of submissions and further submissions on the Strategic Direction chapter is contained in **Appendix 2 – Recommended Decisions on Submissions to this report.**



41. Additional information can also be obtained from the Summary of Submissions (by Chapter or by Submitter) Submissions database Far North District Council (fn/dc.govt.nz) the associated Section 32 report on this chapter section-32-overview.pdf (fn/dc.govt.nz) the overlays and maps on the ePlan Map - Far North Proposed District Plan (isoplan.co.nz).

5.2.1 Key Issue 1: Overview (s)

Overview

Provision(s)	Officer Recommendation(s)
Overview	<ul style="list-style-type: none"> Retain as notified
Strategic direction chapter overviews	<ul style="list-style-type: none"> Delete duplicated overview text

Analysis of Submissions on Key Issue 1

Directions Overview

Submissions

42. Hinemoa Conner (S14), Waiaua Bay Farm Limited (S463) and Creative Northland (S300) all support the Directions Overview section. Hinemoa Conner (S14.001) and Waiaua Bay Farm Limited (S463.010) request no change, while Creative Northland (S300.004) requests to "*Develop & invest in the creative sector/industry as part of the Arts Heritage and Cultural Strategy Long Term Plan.*"
43. Kapiro Conservation Trust (S442.046) also seek amendments to the Directions Overview section to include provisions for indigenous biodiversity. This is supported in FS570.1742 and FS346.657.
44. Federated Farmers (S421.012) supports the Directions Overview section in part and seek to amend point 6 as follows: "The management of urban growth integrating existing and future infrastructure, providing sufficient land, or opportunity to meet growth demands for housing and business while recognising the productive capabilities of the soils and location". The submitter considers that this will recognise the National Policy Statement on Highly Productive Land. There are further submissions in both in support and opposition to this submission point.
45. NZTA (S356.002) with support from Kāinga Ora's further submission (FS243.044) support the Overview section in part and request two new points to be included as follows:
46. "Alignment with central government strategic direction and National Policy Statements; 8. Gives effect to the Northland Regional Policy Statement."
47. Sarah Ballantyne and Dean Agnew (S386) support the Directions Overview section in part and seek amendments to include objectives and policies on social and economic wellbeing (S386.002).



48. Neil Construction Limited (S349) opposes the Directions Overview section and requests for the overview to allow for rural residential capacity (S349.003, S349.004 349.006). Four further submissions oppose this submission point.
49. Kiwi Fresh Orange Company Limited (S554) oppose the Directions Overview and seek to amend the assessment against the NPS-Urban Development and confirm that Kerikeri is an "urban environment" given the existing urban character, existing population and projected population in the medium term, and to classify FNDC as a Tier 3 local authority (S554.001).
50. Kapiro Conservation Trust (S442) and Forest & Bird (S511) also submitted (S511.019, S511.020, S442.039, S511.023, S511.024) (with multiple further submissions both in support and opposition) to replace "For the purposes of preparing, changing, interpreting and implementing the District Plan all other objectives and policies in all other chapters of this District Plan are to be read and achieved in a manner consistent with these strategic objectives" from the overview section with the following:

"For the purpose of District Plan implementation (including the determination of resource consent applications and notices of requirement): a) the strategic objectives may provide guidance on what the related objectives and policies in other chapters of the District Plan are seeking to achieve; and b) the relevant objectives and policies of the District Plan (including strategic objectives in this chapter) are to be considered together and no fixed hierarchy exists between them."

Analysis

51. I have first responded to the various submissions seeking to amend or include additional points in 'The strategic directions are intended to demonstrate' list of the directions overview. The directions overview section takes into account the Far North 2100, which includes sections on the four wellbeings, and is in accordance with Part 2 of the RMA and the higher order planning instruments. The list is not an exhaustive list as such just a broad overview. Accordingly, I recommend these submission points are rejected.
52. In response to the submission from Kiwi Fresh Orange Company Limited who seek to amend the assessment against the NPS-Urban development to confirm that Kerikeri/ Waipapa is an 'urban environment', the position remains that Kerikeri is not an 'urban environment.' Council at the time of notification considered that Kerikeri/ Waipapa will not reach the required thresholds to be considered an 'urban environment' as defined in the NPS-UD in the short, medium or long term. This is the case under both a medium and high growth scenario. Regardless, guidance has been taken from the NPS-UD to develop the PDP. Council is currently awaiting the finalisation of an updated Housing and Business Assessment (HBA), which is being undertaken by Market Economics. Additionally Council is currently



developing a spatial plan for Kerikeri / Waipapa which will look at growth options, which is scheduled to be adopted by Council in early 2025. This work and the HBA may demonstrate that Kerikeri/ Waipapa is or has the potential in the future to reach the required threshold of "a housing and labour market of at least 10,000 people", to be considered an 'urban environment' as defined in the NPS-UD. Council intends that the updated HBA projections and the spatial will be incorporated into the PDP consideration at a later date, to be able to inform the Council's recommendations with regard to rezoning / urban growth-related submissions through upcoming s42A reports (e.g. in relation to the Rezoning / Urban Zones hearing topics)". This submission point is recommended to be rejected for the reasons above.

53. There are multiple submitters requesting amendments to the strategic direction implementation notes. The recommended amendments to wording state that the strategic direction objectives 'may provide guidance'. The proposed amendments appear to weaken the role of the Strategic Directions. The strategic direction chapters are intended to provide overarching direction through the remainder of the district plan through the requirement that the provisions within other chapters are to be read and achieved in a consistent manner.

Section overviews

Submissions

54. Kapiro Conservation Trust (S442) and Forest & Bird (S511) support the Overview section in part. Submission points (S442.040, S511.021, S442.041, S511.022, S442.042, S442.043, S442.044, S442.045) request the following to be deleted from each sections overview "For the purposes of preparing, changing, interpreting and implementing the District Plan all other objectives and policies in all other chapters of this District Plan are to be read and achieved in a manner consistent with these strategic objectives."
55. Forest & Bird (S511) seeks amendments to the Natural Environments Overview to include increasing and enhancing indigenous biodiversity and recognising that Northland is a strong hold for some species and should remain so, that development pressures are resulting in the loss of indigenous biodiversity including through incremental vegetation clearance, and the effects of introduced species and potential to spread kauri dieback (S511.026). They also request the following amendment to the Overview as follows (S511.025):

"For the purpose of District Plan implementation (including the determination of resource consent applications and notices of requirement): a) the strategic objectives may provide guidance on what the related objectives and policies in other chapters of the District Plan are seeking to achieve; and b) the relevant objectives and policies of the District Plan (including strategic objectives in this chapter) are to be considered together and no fixed hierarchy exists between them."



Analysis

56. In response to the submitters requesting the deletion of “For the purposes of preparing, changing, interpreting and implementing the District Plan all other objectives and policies in all other chapters of this District Plan are to be read and achieved in a manner consistent with these strategic objectives” from each of the strategic direction chapter overviews, I recommend these submission points are accepted in part, as this is an unnecessary duplication. The same statement is made in the strategic direction overview. I do not support the additional wording provided for the Natural environment overview because the implementation notes are best addressed in the Overview section. I do not support the substance of the proposed note for the reasons in the section above.

Other

Submissions

57. Forest & Bird (S511) and Kapiro Conservation Trust (S442) request to either amend the title Economic Prosperity or the title to Environmental Prosperity (S511.027, S442.047).

Analysis

58. The sections entitled Economic Prosperity and Environmental Prosperity both starting with ‘E’ has resulted in the duplication of provision coding. I recommend that Economic Prosperity and its subsequent provision coding shall remain as notified in the PDP. I recommend that the Environmental Prosperity heading shall be amended to the Chapter heading ‘Natural Environment’ with subsequent provision coding amended to reflect this.

Recommendation

59. I recommend rejecting the submissions seeking amendments to the overview section, with no changes to the PDP.

60. For the above reasons, I recommend that the submissions proposing to delete the implementation notes from each strategic direction chapter be accepted. This amendment will be reflected in the mark-up of each of the strategic direction chapters.



61. I recommend that Environmental Prosperity section shall be amended to be called Natural Environment and provision coding updated to reflect this.

~~Environmental Prosperity~~ Natural Environment

SD-EPNE-01....

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

Section 32AA evaluation

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

4.1.1 Key Issue 2: Historic and Cultural Wellbeing

Overview

Provision(s)	Officer Recommendation(s)
SD-CP-01	Retain as notified
SD-CP-02	Retain as notified
SD-CP-03	Retain as notified
SD-CP-04	Retain as notified
SD-CP-05	Retain as notified

Analysis of Submissions on Key Issue 2

SD-CP-01

Submissions

64. Te Aupōuri Commercial Development (S339) supports SD-CP-01 to be retained as notified (S339.017). James Conner (13.001) generally supports the vision and strategic direction relating to cultural prosperity.

65. Te Hiku Iwi Development (S399) and Federated Farmers (S421) both support objective SD-CP-01 in part and both seek amendments. Te Hiku Iwi Development (S399.013) requests objective SD-CP-01 to be amended to "*Te Tiriti o Waitangi partnerships with Council supports iwi and hapū to deliver on the social, economic, environmental and cultural wellbeing outcomes for tangata whenua.*" Northland Federated Farmers of New Zealand (S421.013), with opposition from further submissions FS570.1245, FS346.247, FS55.1259, FS569.1284, requests objective SD-CP-01 to be amended as follows:



"Te Tiriti o Waitangi partnerships support iwi and hapū to deliver on the social, economic, environmental and cultural wellbeing outcomes for tangata whenua and the district as a whole."

Analysis

66. In response to the amendments proposed by Te Hiku Iwi Development and Federated Farmers. There is support from multiple submitters to retain the objective, and several further submissions that oppose these amendments. The strategic objectives set out the overarching direction for the PDP. Objective SD-CP-O1 is deliberately intended to focus on delivering outcomes for tangata whenua. The other strategic direction objectives reflect those factors which are considered to be key to achieving the overall vision for the district. Activity and location specific objectives and policies are in the relevant chapter of the district plan. I therefore do not support the proposed changes.

SD-CP-02

Submissions

67. Te Aupōuri Commercial Development (S339) supports SD-CP-02 to be retained as notified (S339.08).
68. Te Hiku Iwi Development Trust (S399) also support objective SD-CP-02 in part and seek amendments to be made to "*Te ao māori, tikanga māori and tangata whenua as kaitiaki, embedded in and integral to Council decision making.*" (S399.014).

Analysis

69. The submission point from Te Hiku Iwi Development Trust seeking amendments to specify '*Council*' is not supported. I note that Council is not always the decision maker when it comes to implementing the PDP and for that reason, I suggest we do not narrow this objective.

SD-CP-03

Submissions

70. Te Aupōuri Commercial Development (S339) and Te Hiku Iwi Development Trust (S339) support SD-CP-03 to be retained as notified (S399.019, 399.015).
71. Creative Northland (S300) support objective SD-CP-03 and seek the continued development of the Arts, Cultural and Heritage Strategy (S300.001). Creative Northland (S300) further supports all the objectives of the Historic and Cultural Wellbeing section and seek for access to participate in cultural practices and further education (S300.005).

Analysis



72. Support for this objective to retain as notified is acknowledged.

SD-CP-04

Submissions

73. Te Aupōuri Commercial Development (S339) and Te Hiku Iwi Development Trust (S399) supports SD-CP-04 to be retained as notified (S339.020, 399.016).

74. Te Rūnanga o Whaingaroa (S486), Te Runanga o Ngai Takoto Trust (S390), and Te Rūnanga Ā Iwi O Ngāpuhi (S498) all oppose objective SD-CP-04 (S486.075, S390.061, S498.062) and all request for objective SD-CP-04 to read as follows:

"The District's historic heritage is identified and managed to ensure its long-term protection for current and future generations, climate change, including by engaging with tāngata whenua and the utilisation of maramataka will lead to a broader and more effective array of solutions."

Analysis

75. I consider that the amendments sought by the submitters are sufficiently included in SD-CP-05 and adding to SD-CP-04 will confuse the aim of this objective. For this reason, I recommend these submission points are rejected.

SD-CP-05

Submissions

76. Te Aupōuri Commercial Development (S339), Te Hiku Iwi Development Trust (S399) and Kāinga Ora (S561) supports SD-CP-05 to be retained as notified (S339.021, S399.017, S561.012).

77. Taituha, Tane & Apiata (S389) support objective SD-CP-05 in part and seek objective SD-CP-05 to be amended to clarify the te ao māori decision making framework and to develop it with iwi and hapū (S389.015).

Analysis

78. The Te Ao Māori decision making framework is expanded on within the Tangata Whenua chapter, this is where the direction appropriately sits (not within the strategic direction objectives). It is the role of policies to state how the objective is to be achieved. Consequently, I recommend SD-CP-05 is retained as notified.



New Objective

Submission

79. Te Rūnanga o Ngāti Rēhia (S559) with further submission support (FS151.144, FS570.2201, FS566.2215, FS569.2237) support the PDP in part and seek a new objective that focuses on the relationship of tangata whenua to their ancestral waterways and the maintenance of that relationship (S559.011).

Analysis

80. I acknowledge Te Rūnanga o Ngāti Rēhia submission point that seeks to include a new objective that focuses on the relationship of tangata whenua to their ancestral waterways and the maintenance of that relationship. While I consider this important, an objective has been included in the Tangata whenua chapter as follows. “*TW-04 – tangata whenua maintain mana whenua in their rohe through and enduring relationships with their culture and traditions, ancestral lands, water, sites, wahi tapu and other taonga.*” Chapter objectives and policies are the more appropriate place to address detail. For this reason, I recommend this submission point is rejected.

Recommendation

81. I recommend those submission points that seek to retain the objectives are accepted.
82. I recommend that submission points that seek amendments to the objectives or new objectives are rejected and no changes are made to the PDP.
83. I recommended that the submissions and further submissions be accepted, accepted in part, or rejected as indicated in Appendix 2.

Section 32AA evaluation

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

5.2.3 Key Issue 3: Economic and Social Wellbeing – Social Prosperity

Overview

Provision(s)	Officer Recommendation(s)
SD-SP-O1	Amendment to add explanation of terminology
SD-SP-O2	Retain as notified
SD-SP-O3	Retain as notified
SD-SP-O4	Minor amendments to provisions structure

Analysis of Submissions on Key Issue 3



SD-SP-01

Submissions

85. Wendover Two Limited (S222), Setar Thirty Six Limited (S168), Matauri Trustee Limited (S243), Bentzen Farm Limited (S167), The Shooting Box Limited (S187), P S Yates Family Trust (S333) and Kairos Connection Trust (S138) all support SD-SP-01 to retain as notified.
86. Sarah Ballantyne and Dean Agnew (S386) seek to amend objective SD-SP-01 to assist plan users and decision makers to understand what makes up a 'sense of place' (S386.003).

Analysis

87. In response to the submission requesting amendments to SD-SP-01, I agree that it is appropriate to clarify what sense of place means. Sense of place could be seen as a 'planning' term. The recommended change expands on what sense of place actually is, this amendment is considered to be helpful to the plan user.

SD-SP-02

Submissions

88. Wendover Two Limited (S222), Setar Thirty Six Limited (S168), Matauri Trustee Limited (S243), Bentzen Farm Limited (S167), The Shooting Box Limited (S187) Kāinga Ora (S561) and Kapiro Conservation Trust (S442) all support SD-SP-02 to retain as notified.

Analysis

89. Support for this objective to retain as notified is acknowledged.

SD-SP-03

Submissions

90. Wendover Two Limited (S222), Setar Thirty Six Limited (S168), Matauri Trustee Limited (S243), Bentzen Farm Limited (S167), The Shooting Box Limited (S187), Manulife Forest Management (NZ) Ltd (S160), Summit Forests New Zealand Limited (S148) and Kairos Connection Trust (S138) all support to retain objective SD-SP-03 as notified (S160.008, S148.012, S138.002).

Analysis

91. Support for this objective to retain as notified is acknowledged.



SD-SP-04

Submissions

92. Wendover Two Limited (S222), Setar Thirty Six Limited (S168), Matauri Trustee Limited (S243), Bentzen Farm Limited (S167), and The Shooting Box Limited (S187) all support SD-SP-04.

93. Te Hiku Iwi Development Trust (S399.018) with further submission support (FS339.027) seeks to amend objective SD-SP-04 to read as follows:

"Promotion of communities and places that will meet the needs for not only the present population but future generations which are adaptive to climate change and that will meet the needs for not only the present population but future generations."

94. Waiaua Bay Farm Limited (S463) oppose objective SD-CP-04 and request for objective SD-CP-04 to be deleted (S463.004) and correct the error in the objective prefix as 'SP' rather than 'CP'.

Analysis

95. The requested changes to SD-CP-04 puts climate change up front in this objective and not just tagged on to the end of this objective. It implies that the future generations will be adaptive to climate change, and it is considered that communities and places should be adaptive to climate change to provide for future generations. Climate change is an issue of district wide importance, further details on what the district is doing in the climate change space are addressed in the Other – Climate changes section of this report.

New Objectives

Submissions

96. NZTA (S356) seeks to include two new objectives on accessibility to social and economic opportunities through the provision of walking, cycling and public transport infrastructure (356.003) with further submission support (FS243.046) and good urban design, public transport and the provision for a range of zones to meet expected demand for the district and to support wellbeing (S356.009).

97. Ngā Tai Ora – Public Health Northland (Ngā Tai Ora) (S516) seeks to include two new objectives "A range of quality open space for the social and cultural well-being of a growing population" (S516.028) and to "Minimise the risks, impacts and costs of natural hazard events on people, communities and the natural and built environment in Far North District" (S516.021).

Analysis



98. In considering these submission points for new objectives, it is important to note that the strategic direction objectives are to be read as a whole. NZTA seeks to insert a new objective around accessibility and transport provision. This will be addressed in the economic objectives section. I am of the opinion that the provision of a range of zones to meet expected demand and support wellbeing is sufficiently covered by the social prosperity objectives combined. Additionally, this applies to Ngā Tai Ora's to request for a new objective around providing for a range of open spaces which is partially addressed in SD-SP-O3, and addressed by proposed amendments to the Urban form and development objectives and subsequently cascaded down to the PDP chapter objectives and policies. For example 'SUB-O4 Subdivision is accessible, connected, and integrated with the surrounding environment and provide for: a) public open spaces...".
99. Ngā Tai Ora, also requests a new objective around natural hazard risk. While I note that natural hazard risk is an issue of particular relevance for the district, it does not transverse complex matters which affect more than one chapter of the plan. Natural hazards risk a matter that is considered in relation to the Natural Hazards chapter, but in my view the issue does not require dedicated overarching direction.

Recommendation

100. I recommend that the majority of submissions received in support of SD-SP-O1 are accepted in part and SD-SP-O1 is retained with amendments, as follows:

SD-SP- O1 -Community wellbeing is heightened by a sense of place belonging, connection to the environment, and inclusiveness.

101. I recommend the submissions to retain SD-SP-O2 and SP-SP-O3 are accepted.

102. For the above reasons, I recommend that the submissions received in support of SD-SP-04 are accepted in part, the submission from Te Hiku Iwi Development Trust is accepted and SP-SP-O4 be retained with the following amendments:

SD-~~ESP~~- O4- Promotion of communities and places which are adaptive to climate change that will meet the needs for not only the present population but future generations. ~~Which are adaptive to climate change~~

103. The submission point from Waiaua Bay Farm Limited is accepted in part and the objective prefix is updated.

SD-~~ESP~~-O4

104. I recommend that submissions and further submissions be accepted, accepted in part or rejected as indicated in Appendix 2.



Section 32AA evaluation

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

5.2.4 Key Issue 4: Economic and Social Wellbeing – Economic Prosperity

Overview

Provision(s)	Officer Recommendation(s)
SD-EP- O1	Retain as notified
SD-EP- O2	Minor amendments
SD-EP- O3	Retain as notified
SD-EP- O4	Amendments to elevate the transport network
SD-EP- O5	Retain as notified

Analysis of Submissions on Key Issue 4

SD-EP-01

Submissions

106. Forest & Bird (S511), Matauri Trustee Limited (S243), Setar Thirty Six Limited (S168), Bentzen Farm Limited (S167), The Shooting Box Limited (S187), Kapiro Conservation Trust (S442) and Wendover Two limited (S222) support objective SD-EP-O1 to be retained as notified.

107. Taituha, Tane & Apiata (S389) support objective SD-EP-O1 in part and request the following amendment (S389.016):

"A high-earning diverse local economy which is sustainable and resilient to economic downturns, with the District's Māori economy making a significant contribution, supporting Māori businesses in adapting to climate change particularly where there are costs."

108. Federated Farmers (S421) (with further submission opposition from four submitters), also support objective SD-EP-O1 in part and request the following amendment (S421.014):

"A high-earning diverse local economy which is sustainable and resilient to economic downturns, ~~with the District's Māori economy making a significant contribution~~"

109. Te Hiku Iwi Development Trust (S399) request the following amendment to objective SD-EP-O1 (S399.019):

"A high-earning diverse local economy which is environmentally and economically sustainable and resilient to economic downturns, with the District's Māori economy making a significant contribution."



Analysis

110. In response to the various submissions requesting amendments to SD-EP-O1, I do not support the addition of methods to this objective which cannot be achieved through the PDP e.g. supporting Māori Business with costs. I also do consider it necessary to include *'with the district Māori economy making a significant contribution'* to the objective as this has been a focus of the plan and has included the introduction of a specific overlay, zones, and provisions which seek to achieve the enablement of Māori land.
111. Te Hiki Iwi development Trust suggested the inclusion of 'environmentally and economically' in addition of sustainable. Use of the term sustainable is expansive enough to include these aspects of sustainability (and is wider reaching than that), so the requested amendments are not appropriate.

SD-EP-O2

Submissions

112. Forest & Bird (S511), and Matauri Trustee Limited (S243), Setar Thirty Six Limited (S168), Bentzen Farm Limited (S167), The Shooting Box Limited (S187), Summit Forests New Zealand Limited (S148) and Wendover Two limited (S222) support objective SD-EP-O2 to be retained as notified.
113. Horticulture NZ (S159) support objective SD-EP-O2 in part and request the following amendment (S159.026). This submission point has both further submission support and opposition:

"Existing and new industries and enterprises are supported and continue to prosper under volatile and changing economic conditions."

Analysis

114. It is appropriate to clarify in SD-EP-O2 that we include the encouragement of new industries and enterprises that develop through the life of the plan. These new industries and enterprises could need support as well as those existing.
115. Additionally, it was requested by Federated Farmers that a new objective be added to economic prosperity chapter around initiatives and enterprises within the district's economy which are carried out by iwi and hapū. SD-EP-O2 is proposed to be updated to reflect it may not just be the end product of industries or an enterprise, initiatives should also be included in this objective. The contribution of iwi and hapu is sufficiently covered by SD-EP-O1 and does not need to be addressed in a new objective.

SD-EP-O3



Submissions

116. Forest & Bird (S511), and Matauri Trustee Limited (S243), Setar Thirty Six Limited (S168), Bentzen Farm Limited (S167), The Shooting Box Limited (S187), Ballance Agri-Nutrients Limited (S143) Kapiro Conservation Trust (S442) and Wendover Two limited (S222) support objective SD-EP-O3 to be retained as notified.

Analysis

117. Support for this objective to retain as notified is acknowledged.

SD-EP-O4

Submissions

118. Forest & Bird (S511), and Matauri Trustee Limited (S243), Setar Thirty Six Limited (S168), Bentzen Farm Limited (S167), The Shooting Box Limited (S187), Kapiro Conservation Trust (S442) Summit Forests New Zealand Limited (S148) and Wendover Two limited (S222) support objective SD-EP-O4 to be retained as notified.
119. Twin Coast Cycle Trail (S425.008) and Kapiro Conservation Trust (S446.006) both support objective SD-EP-O4 in part.
120. Our Kerikeri Community Charitable Trust (S271), Kapiro Conservation Trust (S446), Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S524), and Carbon Neutral NZ Trust (S529) all support objective SD-EP-O4 in part and seek to amend objective SD-EP-O4 to "*People, businesses and places are connected digitally and through multi modal integrated transport network*" (S271.006, S446.006, S524.006, S529.071 and multiple further submissions in support).
121. NZTA (S356), with further submission support from Kāinga Ora, also seek to amend objective SD-EP-O4 as follows (S356.004):

"People, business and places are connected digitally and through an integrated transport networks that is safe, efficient and sustainable."

Analysis

122. The changes sought by multiple submitters to include '*multi modal*' are considered unnecessary, as I consider in the Far North context the term '*integrated transport network*' is sufficient to cover a range of transport including passive and active transport. With the different types of transport addressed in the Transport chapter objectives and policies.
123. The amendments sought by NZTA to the objective better reflects transport outcomes which include safety, choice and efficiency, this also relates to other submission points which look to promote other types of transport and those submission points from Ngā Tai Ora and Twin Coastal



Cycle Trail which seek the inclusion of a new objective around accessibility and safety.

SD-EP-05

Submissions

124. Forest & Bird (S511), and Matauri Trustee Limited (S243), Setar Thirty Six Limited (S168), Bentzen Farm Limited (S167), The Shooting Box Limited (S187), Kapiro Conservation Trust (S442) P S Yates Family Trust (S333) Summit Forests New Zealand Limited (S148) and Wendover Two limited (S222) support objective SD-EP-05 to be retained as notified.
125. Kāinga Ora (S561) support objective SD-EP-05 in part and request the following amendment (S561.014):

"A district economy that is responsive, resilient and adaptive to the financial costs ~~of~~ and changing economic activity driven by a changing climate."

Analysis

126. I agree that not only will there be financial costs arising from climate change but also the need to identify new economic opportunities. However, I consider that amendments proposed to SD-EP-02 to also include '*new industries, enterprises and initiatives*' go some way to achieve the relief sought, whilst keeping each of the objectives appropriately focussed on separate topics. No further amendments are recommended.

New Objectives

Submissions

127. Federated Farmers (S421.015) with further submission opposition (FS570.01247, FS346.249, FS566.1261, FS569.1283) request a new objective to be included within the Economic Prosperity section that supports and enables initiatives and enterprises within the district's economy which are carried out by iwi and hapū.
128. Ngā Tai Ora (S516) and Twin Coast Cycle Trail (S425) seek a new objective as follows (S516.026, S425.007):

"Maintain and enhance accessibility and safety for communities and integrate land use and transport planning."

Analysis

129. The amendments sought above to SD-EP-04 by NZTA go some way to achieve the relief sought by these submitters seeking new objectives. While accessibility, safety and the integration of land use and transport



planning are considered important issues for the district, it is best left to the transport objectives and policies to provide further detail as to what this looks like.

130. Regarding the submission for the new objective to specifically support and enable initiatives and enterprises within the district's economy which are carried out by iwi and hapū, I consider that this is sufficiently covered by the all the Economic prosperity objectives which designed to be read together.

Recommendation

131. For the above reasons, I recommend that the submissions received on SD-EP-O1 to retain the objective are accepted and those that request amendments are rejected.

132. I recommend the submissions on the SD-EP-02 are accepted in part and the objective is to be amended as follows:

SD-EP- O2- Existing and new industries, ~~and~~ enterprises and initiatives are supported and continue to prosper under volatile and changing economic conditions.

133. I recommend that the submissions in support of SD-EP-O3 be accepted and the objective to be retained as notified.

134. For the above reasons, I recommend the submissions on SD-EP-O4 are accepted in part and the objective is amended as follows:

SD-EP- O4- People, businesses and places are connected digitally and through an integrated transport networks that is safe, efficient, and sustainable.

135. I recommend that the submissions seeking to retain SD-EP-O5 are accepted and the submission from Kāinga Ora is rejected.

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

Section 32AA evaluation

137. A section 32AA evaluation for the recommendation to amend SD-EP-O4 is provided below:

- The recommended amendments to include "... *that is safe, efficient and sustainable*" are more appropriate in achieving the purpose of the RMA, in that it is inclusive of the health and safety of communities.
- The recommended amendments assist with clarifying how the transport network should operate.



- The strategic direction objectives are broad and, in some cases, aspirational and there is a clear linkage to the transport chapter objectives, policies and rules.

138. For the above reasons, the recommended amendments are considered to be more appropriate in achieving the purpose of the RMA than the notified version of the PDP.

5.2.5 Key Issue 5: Urban Form and Development

Overview

Provision(s)	Officer Recommendation(s)
SD-UFD-01	Retain as notified
SD-UFD-02	Retain as notified
SD-UFD-03	Amendments to consider infrastructure more broadly
SD-UFD-04	Retain as notified

Analysis of Submissions on Key Issue 5

SD-UFD-01

Submissions

139. Creative Northland (S300), Kairos Connection Trust (S138) and Margaret Sheila Hulse and John Colin Hulse (S247) support objective SD-UFD-01. Margaret Sheila Hulse and John Colin Hulse (S247.001) and Kairos Connection Trust (S138) seek to retain objective SD-UFD-01 as notified while Creative Northland (S300.003, S138.003) has requested *"greater education of wellbeing across community for all ages."*
140. Neil Construction Limited (S349) oppose all objectives in the Urban Form and Development section and have requested for all four objectives to be deleted or amend them to reinforce the importance of additional rural residential development (S349.005).
141. Sarah Ballantyne and Dean Agnew (S386) oppose objective SD-UFD-01 and request for its deletion (S386.005).
142. NZTA (S356) supports objective SD-UFD-01 in part but requests amendments to provide more clarity on how it might be implemented (S356.005).

Analysis

143. Multiple submitters seek to retain SD-UFD-01 as notified. I do not support the NZTA request to provide more clarity on how this objective might be implemented, or Creative Northland's submission seeking greater education of wellbeing across the community. The role of strategic objectives is to set outcomes. It is the job of policies and rules, and in



the case of Creative Northland's submission, methods outside the PDP, that direct implementation.

SD-UFD-O2

Submissions

144. Ngā Tai Ora (S516), Kāinga Ora (S561), NZTA (S356), FENZ (S512), Kairos Connection Trust (S138) and Top Energy Limited (S483) all support retention of objective SD-UFD-O2 as notified (S516.019, S561.015, S356.006, S512.009, S138.004, S483.027).
145. Sarah Ballantyne and Dean Agnew (S386) support objective SD-UFD-O2 in part but request amendments to establish a centres hierarchy for Far North's small, medium and larger town centres (S386.006).
146. Neil Construction Limited (S349) opposes all objectives in the Urban Form and Development section and have requested for all four objectives to be deleted or amended to reinforce the importance of additional rural residential development (S349.005).
147. Waiaua Bay Farm Limited (S463) oppose objective SD-UFD-O2 and request for it to be amended as follows (S463.005):

"Urban growth and development in the urban zones is consolidated around existing reticulated networks within town centres, supporting a more compact urban form, affordability and providing for a mix of housing typologies."

Analysis

148. Multiple submitters seek that SD-UFD-O2 is retained as notified. I am not supportive of Sarah Ballantyne and Dean Agnew's submission seeking amendments to the objective to establish a centre hierarchy for Far North's town centres because the work has not been done to establish a centres hierarchy and the submitter does not suggest amended wording. The response to submissions seeking objectives for a centres hierarchy are discussed in more detail later in this report. The amendments sought by Waiaua Bay Farm Limited specifying urban zones are unnecessary, it will be the role of the objectives and policies of the special zones that guide development in these areas. It should be noted that the HBA study for the district and the Kerikeri / Waipapa spatial plan is under way at the time of writing this report. Its findings could go some way to addressing the relief sought by these submitters, as it would signal through the district plan that this is a key centre / urban area within the district where urban growth enablement may be provided. It will also have a dedicated spatial plan unlike other parts of the district.



SD-UD-03

Submissions

149. Kāinga Ora (S561), Top Energy Limited (S483) and FENZ (S512) all support retention of objective SD-UFD-03 as notified (S561.016, S483.028, S512.010).

150. Neil Construction Limited (S349) opposes all objectives in the Urban Form and Development section and has requested for all four objectives to be deleted or amended to reinforce the importance of additional rural residential development (S349.005).

151. Ngā Tai Ora (S516) with further submission opposition (FS196.230) supports objective SD-UFD-03 in part but requests amendments as follows (S516.020):

"Adequate development infrastructure in place or planned to meet the anticipated demands for housing and business activities. Ensure that efficient and effective onsite and reticulated infrastructure is provided in a sustainable manner."

152. MOE (S331) supports objective SD-UFD-03 in part but requests amendments as follows (S331.009):

"There is adequate development infrastructure (including additional infrastructure) in place or planned to meet the anticipated demands for community development including the provision of housing and business employment activities."

153. NZTA (S356) with further submission opposition (FS369.092, FS 403.075) also support objective SD-UFD-03 in part but requests amendments as follows (S356.007):

"Adequate development infrastructure in place or planned to meet the anticipated demands for housing and business activities new development."

154. Waste Management (S360) opposes the general PDP and requests amendments to the Strategic Direction to recognise the importance that waste management facilities play in supporting the development and growth of the district (S360.001).

Analysis

155. Ngā Tai Ora seeks amendments to ensure that efficient and effective onsite and reticulated infrastructure is provided in a sustainable manner. The direction of the urban form and development objectives is that adequate infrastructure in place or planned to support the demands of a new urban zone. I agree that the objective at the strategic direction level needs to be wider than just development infrastructure as stated by Ngā



Tai Ora, the provision of electricity and telecommunications infrastructure is also important for communities.

156. The submission points from NZTA, and MOE, seek that the objective refers to development in general rather than just housing and business activities. This objective was drafted to capture the intent of the NPS-UD and therefore uses consistent language. SD-UFD-O2 talks about development more generally.

157. MOE seek the inclusion of additional infrastructure into this objective. In responding to this I also note Waste Management submission to recognise the importance of waste management facilities in supporting the development and growth of the district. The definition of infrastructure in the PDP is limited to that of the RMA. I therefore consider it appropriate to include "additional infrastructure" in this objective, in keeping with the definitions from the NPS UD. The definition of "additional infrastructure" means:

(a) public open space

(b) community infrastructure as defined in section 197 of the Local Government Act 2002

(c) land transport (as defined in the Land Transport Management Act 2003) that is not controlled by local authorities

(d) social infrastructure, such as schools and healthcare facilities

(e) a network operated for the purpose of telecommunications (as defined in section 5 of the Telecommunications Act 2001)

(f) a network operated for the purpose of transmitting or distributing electricity or gas

SD-UFD-O4

Submissions

158. Kāinga Ora (S561), NZTA (S356), FENZ (S512) all support retention of objective SD-UFD-O4 as notified (S561.017, S536.008, S512.011).

159. Neil Construction Limited (S349) opposes all objectives in the Urban Form and Development section and has requested for all four objectives to be deleted or amended to reinforce the importance of additional rural residential development (S349.005).

160. Ngā Tai Ora (S516) requests amendments to objective SD-UFD-O4 as follows (S516.022):

"Urban growth and development is resilient, and adaptive to pre-empt the impacts from natural hazards ~~or~~ and climate change."



Analysis

161. The direction for this objective has adopted from the NPS -UD Policy 1 (f) which directs that urban environments are resilient to the likely current and future impacts from climate change. As noted, the NPS-UD is not currently considered applicable to the Far North District but it provides good planning practice. The proposed amendments to refer to pre-emption of impacts from natural hazards are unnecessary. The Natural Hazards chapter contains the specific objectives, policies, and rules. There are several submitters that support the retention, as notified of this objective.

New Objectives

Submissions

162. Bunnings Limited (S371), Paihia Properties (S344), Foodstuffs (S363), Te Aupōuri Commercial Development Ltd (S399), McDonalds Restaurants (NZ) Limited (S385) and New Zealand Maritime Parks Ltd (S251) support the PDP in part and seek clear direction for growth and development and request evaluated objectives in accordance with section 32AA to confirm that these are the most appropriate objectives (S371.001, S344.005, S363.006, S399.016, S385.031, S385.006, S251.001, S251.002).

163. Sarah Ballantyne and Dean Agnew (S386) seek amendments to be made to the Urban Form and Development section to include a centre's hierarchy, objectives that outline the purpose of business land and the recognition of transport network (S386.004).

164. Kāinga Ora (S561.018) requests a new objective as follows:

"Enable higher residential intensification in the area within moderate walking distance around Kerikeri Town Centre."

165. Forest & Bird (S511.035) and Kapiro Conservation Trust (S442.055) with further submission support, request a new objective as follows:

"Urban growth and development incorporates and sustains indigenous biodiversity."

166. Waiaua Bay Farm Limited (S463) request a new objective as follows (S463.006):

"Activities on land adjoining a Special Purpose Zone are managed to have regard to, and avoid or mitigate potential adverse effects on, the unique values or functions of the Special Purpose Zone."

167. Ngā Tai Ora (S516) request a new objective and policy as follows (S516.029):



"New objective: Ensure high quality urban design that responds positively to the local context and creates and maintains safe urban environments in the Far North District

New policy: Ensure the application of high quality urban design by requiring subdivision and development to demonstrate how it will contribute to a compact, connected, distinctive, diverse, attractive, appropriate, sustainable and safe urban form."

168. Our Kerikeri Community Charitable Trust (S271) Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S524) Carbon Neutral NZ Trust (S529) and Kapiro Conservation Trust (S446) also request a new objective and policy as follows (S271.008, S524.008, S529.073, S446.008) with further submission support:

"SD-UFD-OXX Urban growth and development is high quality and responds positively to the local context and outcomes expected for the zone.

SD-UFD-PXX To manage change in urban environments by ensuring a high level of amenity through quality urban design by: a. Identifying areas where active frontages are required to support a vibrant and pedestrianized environment b. Requiring development in urban centers to show how they will contribute to a connected, distinctive attractive, appropriate, sustainable and safe urban form. c. Ensuring that development responds to local context, including through alignment with relevant spatial or strategic document."

169. Paihia Properties (S344) and Foodstuffs (S363) with further submission support, request a new objective and policy as follows (S344.006, S363.007):

"Objective: Ensure that there are sufficient opportunities for development of residential and business land to meet demand.

Policy: To ensure that there is sufficient residential and business development capacity by zoning land where development is feasible and: Is serviced with development infrastructure; or Funding for development infrastructure is identified in the Long Term Plan."

170. Summerset Group Holdings Limited (S218) and Retirement Villages Association of New Zealand Incorporated (S520) requests a new objective as follows (S218.001, S520.001):

"Recognise and enable the housing and care needs of the ageing population."

171. Margaret Sheila Hulse and John Colin Hulse (S247) request a new policy as follows (S247.002):



"Avoid subdivision and development that would enable housing and population growth in areas where primary medical care services are not available or inadequate to support the wellbeing, health and safety of additional people."

Analysis

172. In regard to the requests for new objectives that recognise the transport network, the importance of the transport network has been sufficiently covered in SD-EP-O3, and the broadening of SD-UFD-O3 to include additional infrastructure.
173. I do not consider it appropriate to include a specific objective around residential intensification. It is the role of the objectives and policies for the General Residential and Mixed-Use zone to provide for residential intensification, this has been achieved through a variety of methods such as provision for multiunit developments. SD-UFD-O2 provides direction for residential intensification around town centres.
174. It is also important to note here that SD-UFD-O2 includes the term "urban consolidation". The direction here is that the urban footprint is contained around centres and existing and planned infrastructure, intensification is considered a subset of consolidation, as intensification is a means of achieving consolidation.
175. The submissions seeking a new objective around Urban growth and development that incorporates and sustains indigenous biodiversity is best addressed in the Natural environment section of the strategic direction with further direction given as to how this is achieved in the Ecosystems and indigenous biodiversity chapter.
176. Waiaua Bay Farm Limited seeks an additional objective around reverse sensitivity of special purpose zones. This issue was addressed in the s32 report for the Kauri Cliffs zone. The report considered that a policy around managing activities outside of the area was not appropriate. It was considered that the activity in the Kauri Cliffs zone was not considered to be regionally or nationally significant and that it is appropriate that land use on adjoining sites is managed through the provisions of the underlying zones.
177. Objective SD-UFD-O1 is wide ranging, and in combination with the social prosperity objectives provides the direction for the type of urban growth that is expected in the district. I consider that these objectives cover off the requests for new objectives around high quality, safe, urban environments that respond positively to the local context and outcomes expected in zones. SD-UFD-O3 responds to the request for a new objective around access to medical facilities as this would be included in the definition of social infrastructure.
178. I consider that the SD-UFD-O3 goes far enough in responding to the residential and business demand with the current information we have



available. Once the updated HBA becomes available it may be necessary to address changes in this position in the urban and rezoning s42A reports.

179. I do not consider it appropriate to include a specific objective relating to housing needs for a particular portion of the population. SD-UFD-O1 and O2 already seeks a range of living options to meet community needs and seeks to respond to community needs, including diversity in housing opportunities. In my view, this already appropriately covers the aging population, as well as the housing needs of other members of the community.
180. In terms of adding an objective relating to indigenous biodiversity, I do not consider this is necessary to achieve the purpose of the RMA in relation to urban areas. In particular, while I consider it appropriate to encourage the incorporation of indigenous biodiversity, I do not consider that it is something that should be required, as it extends beyond the maintenance of indigenous biodiversity.

Recommendation

181. I recommend that the submissions to retain SD-UFD-O1 are accepted, those that oppose or seek amendments are rejected and SD-UFD-O1 is retained as notified.
182. I recommend that the submissions to retain the SD-UFD-O2 are accepted, those that oppose or seek amendments are rejected and SD-UFD-O2 is retained as notified.
183. I recommend SD-UFD-O3 is amended as follows, and those submissions that seek the retention of the objective are accepted in part, those that seek amendments are supported in part. Those that seek deletion are rejected. It is also recommended a new definition is inserted into the plan to define the term inserted into this objective

Adequate development infrastructure and additional infrastructure is in place or planned to meet the anticipated demands for housing and business activities.

Additional infrastructure:

- (a) public open space
- (b) community infrastructure as defined in section 197 of the Local Government Act 2002
- (c) land transport (as defined in the Land Transport Management Act 2003) that is not controlled by local authorities
- (d) social infrastructure, such as schools and healthcare facilities



(e) a network operated for the purpose of telecommunications (as defined in section 5 of the Telecommunications Act 2001)

(f) a network operated for the purpose of transmitting or distributing electricity or gas

184.I recommend that submissions seeking to retain SD-UFD-04 be accepted, and those that seek deletion and amendments be rejected.

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

Section 32AA evaluation

186.A section 32AA evaluation for the recommendation to include social infrastructure in SD-UFD-03 and via a definition in the PDP is provided below:

- The recommended amendments are more appropriate in achieving the purpose of the RMA, that in providing for additional infrastructure enables people and communities to provide for their social, economic and cultural wellbeing, compared to that of the notified version of the PDP.
- The inclusion of the definition of “additional infrastructure” is in line with the NPS -UD.

187. For the above reasons, the recommended amendments are considered to be more appropriate in achieving the purpose of the RMA than the notified version of the PDP.

5.2.6 Key Issue 6: Infrastructure and Electricity

Overview

Provision(s)	Officer Recommendation(s)
SD-IE-01	Retain as notified
SD-IE-02	Minor amendment for consistency

Analysis of Submissions on Key Issue 6

SD-IE-01

Submissions

188. Transpower New Zealand Ltd (S454), Top Energy Limited (S483), Manulife Forest Management (NZ) Ltd (S160), NZTA (S356), and RNZ



(S489) all support objective SD-IE-01 to be retained as notified (S454.030, S483.029, S160.009, S356.010, S489.009).

189. MOE (S331) supports objective SD-IE-01 in part and requests it be amended as follows (S331.010):

"The benefits of infrastructure (including additional infrastructure) and renewable electricity generation activities across the district are recognised and provided for, while ensuring their adverse effects are managed."

Analysis

190. In response to MOE submission seeking amendments to SD-IE-01, the infrastructure and electricity strategic objectives use the term infrastructure generally and apply the definition of infrastructure as per the RMA. This objective only applies to infrastructure as per the content in the infrastructure chapter of the PDP. Additional infrastructure is addressed in the urban form and development and social and economic strategic objectives, where I have recommended SD-UFD-03 include additional infrastructure. I therefore do not support the proposed amendment.

SD-IE-02

Submissions

191. Transpower New Zealand Ltd (S454), Top Energy Limited (S483), and NZTA (S356) all support objective SD-IE-02 to be retained as notified (S454.030, S483.030, S356.011).
192. RNZ (S489) supports objective SD-IE-02 in part and requests it be amended as follows (S489.010):

"Infrastructure, in particular regionally significant infrastructure, and renewable electricity generation activities are protected from incompatible land use, subdivision and development, including avoiding reverse sensitivity effects, that may compromise their effective operation, maintenance and upgrading."

193. KiwiRail Holdings Limited (S416) also supports objective SD-IE-02 in part and requests it be amended as follows (S416.010) with further submission support (FS111.034, FS369.101):

"Infrastructure and renewable electricity generation activities are protected from incompatible land use, subdivision and development that may compromise their effective operation, maintenance, repair and upgrading."

194. Horticulture NZ (S159) seeks to amend objective SD-IE-02 as follows (S159.028):



"Recognise and provide for infrastructure and renewable electricity generation activities and ensure that their operation, maintenance and upgrading are not are protected from incompatible land use, subdivision and development that may compromised by incompatible subdivision, use and development."

195. Federated Farmers (S421) with five further submitters in opposition also seeks to amend objective SD-IE-O2 as follows (S421.016):

~~"Infrastructure and renewable electricity generation activities are protected from incompatible land use, subdivision and development that may compromise their effective operation, maintenance and upgrading. Land use, subdivision and development that have more than minor effects on the effective operation, maintenance and upgrading of infrastructure and renewable electricity generation are appropriately managed and mitigated."~~

Analysis

196. I do not support the amendments proposed to SD-IE-O2 by Horticulture NZ and Federated Farmers. In regard to these submissions I make the following comments. The submissions state that this objective should be consistent with higher order documents. I understand that the drafting approach taken to these chapters was to identify and respond to those resource management issues considered to be of particular importance to the Far North District. This included matters of national and regional importance that are particularly relevant within the District, or issues that traverse more complex matters which affect more than one chapter of the PDP. As such, the content of these chapters intentionally did not traverse every matter of national importance, and replication of the wording in the RMA and higher order documents was specifically avoided as being unnecessary and repetitive. The objectives are intended to be broad and overarching.
197. In response to RNZ submission, the inclusion of regionally significant infrastructure is addressed below in the analysis of new objectives. I do not consider that reverse sensitivity should be specifically addressed in the strategic direction objectives, but targeted direction in the zone objectives and policies.
198. I recommend that the submission from KiwiRail Holdings Limited to amend SD-IE -O2 to include 'repair' be accepted, as this terminology is consistent with plan wide terminology around infrastructure.

New Objectives

Submissions

199. Twin Coast Cycle Trail (S425) seeks one new objective and two new policies as follows (S425.006):



"Objective: The benefits of Regionally Significant Infrastructure are recognised and provided for.

Policy: To recognise and provide for the social, economic and cultural benefits of Regionally Significant Infrastructure by enabling its ongoing operation, maintenance, development, and upgrading where adverse effects are managed.

Policy: To protect existing and planned regionally significant infrastructure from adverse effects resulting from new subdivision use and development."

200. Top Energy Limited (S483) seeks a new objective as follows (S483.031):

"Regionally Significant Infrastructure is identified and protected. The benefits of Regionally Significant Infrastructure are recognised and provided for. Avoid, remedy, mitigate or offset adverse effects arising from the development, operation, maintenance, and upgrading of Regionally Significant Infrastructure."

201. Ngā Tai Ora (S516) also seek a new objective and a policy as follows (S516.025):

"The benefits of Regionally Significant Infrastructure are recognised and provided for.

Policy: To recognise and provide for the social, economic and cultural benefits of Regionally Significant Infrastructure by enabling its ongoing operation, maintenance, development, and upgrading where adverse effects are managed."

Analysis

202. Several submitters seek the inclusion of an objective for regionally significant infrastructure. The objectives were specially left broad to include infrastructure generally, there are provisions throughout the PDP that address regionally significant infrastructure. The nature of the overarching objective does not, in my view, mean that all infrastructure will be treated the same. Rather, how this infrastructure is recognised and provided for can be targeted differently between nationally, regionally, and locally significant infrastructure. This is a common approach in district plans where, for example, specific provisions are included in relation to nationally significant infrastructure, such as the National Grid, which are different to those applying to local infrastructure.

203. In response to the submission points to include policies in relation to the strategic direction objectives. I consider the introduction of policies unnecessary and not in line with the direction of the PDP, in that the chapters are where the specific objectives and policies are best housed. This is discussed in more detail later in this report.



Recommendation

204. I recommend that submissions seeking to retain SD-IE-O1 be accepted. I recommend that the submissions seeking amendments are rejected

205. I recommend that submitters that seek to retain SD-IE-O2 be accepted in part with RNZ, Federated Farmers and Horticulture NZ submissions be rejected and KiwiRail’s submission seeking a minor amendment be accepted as follows:

Infrastructure and renewable electricity generation activities are protected from incompatible land use, subdivision and development that may compromise their effective, operation maintenance, repair and upgrading.

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

Section 32AA evaluation

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

5.2.7 Key Issue 7: Rural Environment

Overview

Provision(s)	Officer Recommendation(s)
SD-RE-O1	Retain as notified
SD-RE-O2	Retain as notified

Analysis of Submissions on Key Issue 7

SD-RE-O1

Submissions

208. PF Olsen Limited (S91), New Zealand Pork Industry Board (S55), Ballance Agri-Nutrients Limited (S143), NZ Agricultural Aviation Association (S182), NZTA (S356), Waiaua Bay Farm Limited (S463) and Manulife Forest Management (NZ) Ltd (S160) all support objective SD-RE-O1 to be retained as notified (S91.019, S55.012, S143.002, S182.011, S356.012, S463.007, S160.010).

209. Neil Construction Limited (S349) opposes all objectives in the Rural Environment section and has requested for all objectives to be deleted or amended to reinforce the importance of additional rural residential development (S349.007). This is opposed by FS62.041 and FS333.028).



210. Horticulture NZ (S159) supports Objective SD-RE-O1 in part and requests for it to be amended as follows (S159.029):

"Primary production activities are recognised and provided for to enable them to operate efficiently and effectively to ensure and the contribution they make to for the economic and social well-being of the district and not be compromised by inappropriate subdivision, use and development and prosperity of the district is recognised."

Analysis

211. I consider that the Rural Production zone objective and policies and higher order direction sufficiently provide for primary production activities and it is not necessary to amend Objective SD-RE-O1 as requested by Horticulture NZ. I consider the strategic objectives broadly provide for primary production activities in the district.

SD-RE-O2

Submissions

212. PF Olsen Limited (S91), Ballance Agri-Nutrients Limited (S143), NZ Agricultural Aviation Association (S182), NZTA (S356), and Horticulture NZ (S159) all support objective SD-RE-O2 to be retained as notified (S91.019, S143.003, S182.012, S356.013, S159.030).

213. Neil Construction Limited (S349) opposes all objectives in the Rural Environment section and has requested for all objectives to be deleted or amended to reinforce the importance of additional rural residential development (S349.007). This is opposed by FS62.041 and FS333.028.

214. Transpower New Zealand (S454.031), with further submitters both in support and opposition, seeks objective SD-RE-O2 to be amended as follows

"Protection of highly productive land from inappropriate development, excluding infrastructure that has a functional or operational need, to ensure its production potential for generations to come."

215. Waiaua Bay Farm Limited (S463) opposes objective SD-RE-O2 and requests for its deletion (S463.008). Stating that the proposed policy has become redundant by the recent introduction of the NPS-HPL.

Analysis

216. The submission seeking amendments to SD-RE-O2 to exclude infrastructure that has a functional or operation need is unnecessary and I consider that the term 'inappropriate' in the objective covers off this. The NPS-HPL includes implementation clause 3.9 which contains an exemption for the maintenance, operation upgrade, or expansion of specified



infrastructure. For these reasons, I consider this submission should be rejected.

217. I consider that even though the NPS-HPL has been introduced the protection of highly productive land is still an important issue for the Far North District, this objective provides direction even if there are changes to the NPS – HPL.

New Objectives

Submissions

218. Sarah Ballantyne and Dean Agnew (386) request the Rural Environment section to be amended to recognise the diversity and variation of the qualities and characteristics within the rural environments, the small rural settlements that are already established within the rural environment, and the large tracts of rural lifestyle activities (S386.007, S386.008).

219. Wendover Two Limited (S222), Setar Thirty Six Limited (S168), Matauri Trustee Limited (S243), Bentzen Farm Limited (S167), P S Yates Family Trust (S333) and The Shooting Box Limited (S187) all support the objectives in part and request a new objective to be included within the Rural Environment section as follows (S222.004, S168.012, S243.014, S167.005, S333.005, S187.005):

"The importance of non-primary production activities in the rural environment to the social, economic and cultural well-being of the district is recognised and provided for."

220. This is opposed by multiple further submitters.

221. Federated Farmers (S421) support the objectives in part but request a new objective as follows (S421.017):

"Primary production activities are supported by Council to adapt to change required by regulatory and consumer demands." or wording with similar intent.

222. Forest & Bird (S511) and Kapiro Conservation Trust (S442) both seek an additional clause as follows (S511.036, S442.056, with 8 further submissions in support):

"Ensure that within rural areas the establishment and operation of primary production activities are not limited by new incompatible sensitive activities and limit those other activities in the rural areas."

Analysis

223. I agree Rural Residential, Rural Lifestyle and Settlement zoning is a necessary component of the rural environment in the Far North District. However, I consider that the strategic objectives do not necessarily need to cover all components of the plan and the Rural Residential, Rural



Lifestyle, Settlement, and the associated zoning pattern sufficiently provide for this type of activity. Rural Residential or Rural Lifestyle zoning has been directed away from highly productive land, natural resources and in the case of the Rural Residential zone is contiguous to urban areas

224. It is to be noted that the PDP now provides for multiple rural zones (Rural Lifestyle, Rural Residential and Settlement zone) as opposed to the Operative Plan which just contained Rural Living and Rural Production zones. The new zones introduced in the PDP recognise the need and the different character of areas, and these zones provide for a range of permitted activities.
225. I consider the suggested objective seeking recognition of non-primary activities weakens the other objectives for the rural environment and the key issues the plan is responding to. I consider that the request for a new objective from Forest & Bird (S511) and Kapiro Conservation Trust is sufficiently covered by SD-RE-O1 and, as mentioned multiple times in this report, the strategic direction objectives do not need to be all encompassing and the zone objectives and policies can further specify direction.
226. The submission from Federated farmers seeking an objective to support primary production activities to adapt to change required by regulatory and consumer demands is sufficiently covered by all the Economic prosperity objectives.

Recommendation

227. I recommend that the submissions to retain SD-RE-O1 be accepted, and that those that seek deletion and amendments be rejected
228. I recommend that the submissions to retain SD-RE-O2 be accepted, and that those that seek deletion and amendments be rejected.
229. I recommend that submissions and further submissions be accepted, accepted in part or rejected as indicated in Appendix 2.

Section 32AA evaluation

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

5.2.8 Key Issue 8: Natural Environment

Overview

Provision(s)	Officer Recommendation(s)
SD-EP-NE-O1	Retain as notified
SD-EPNE-O2	Retain as notified
SD-EPNE-O3	Retain as notified
SD-EPNE-O4	Retain as notified
SD-EPNE-O5	Retain as notified



Provision(s)	Officer Recommendation(s)
SD-EPNE-06	Minor typing amendment

Analysis of Submissions on Key Issue 8

SD-EP-01

Submissions

231. NZTA (S356) supports objective SD-EP-01 and requests that it is retained as notified (S356.014, S356.015).
232. Te Hiku Iwi Development Trust (S399) support objective SD-EP-01 in part and request for the following amendment (S399.020):

"A culture of stewardship is evident in the community that protects and increases the District's biodiversity and environmental sustainability."

Analysis

233. I consider that the inclusion of protection in SD-EP-01 is too prescriptive for Objective SD-NE-01. This directive is more appropriate for significant indigenous vegetation and significant habitats of indigenous fauna as included in SD-EP-06, as per the direction from the RPS Objective 3.4. Specific direction is reserved for the indigenous biodiversity chapter.

SD-EP-02

Submissions

234. Te Hiku Iwi Development Trust (S399) supports objective SD-EP-02 and requests that it is retained as notified.
235. NZTA (S356) supports objective SD-EP-02 in part and requests the following amendment (S399.021):

"Collaborative relationships with iwi and hapu are fostered and maintained in order to support tangata whenua to carry out their obligation and responsibility as kaitiaki."

236. Haititaimarangai Marae Kaitiaki Trust (S394) also support objective SD-EP-02 in part and requests the following amendment (S394.011):

"~~Collaborative~~ relationships with iwi and with hapū and recognise hapū tino rangatiratanga in order to support tangata whenua to exercise self determination in their rohe and carry out their obligation and responsibility as kaitiaki."

Analysis

237. While I consider the inclusion of the words "*fostered and maintained*" to this objective are appropriate in that the relationships with iwi and hapu



need to be fostered and maintained, the strategic objective is not the place to provide that detail. The Tangata whenua chapter policies provide direction as to how collaborative relationships will be managed, and the ecosystems and indigenous biodiversity chapter includes acknowledgement of tangata whenua's relationship with indigenous biodiversity. Haititaimarangai Marae Kaitiaki Trust further seeks the objective to recognise hapu tino rangatiratanga and states that the relationship tangata whenua have with the environment is broader than holding a kaitiaki role. The role of tangata whenua in relation to s6 (e) of the RMA is included in the tangata whenua and indigenous biodiversity objectives TW-O4 and IB-O3, therefore amendment to this objective is not necessary.

SD-EP-03

Submissions

238. NZ Agricultural Aviation Association (S182), DOC (S364), Carbon Neutral NZ Trust (S529), NZTA (S356) and Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527) all support objective SD-EP-03 and request that the objective be retained as notified (S182.013, S364.020, S529.118, S356.016, S527.004).

239. Te Hiku Iwi Development Trust (S399) support objective SD-EP-03 in part and request for the following amendment (S399.022):

"Active management of ecosystems to protect, maintain and increase indigenous biodiversity for future generations is ongoing."

240. Manulife Forest Management (NZ) Ltd (S160) also support objective SD-EP-03 in part and request the following amendment (S160.011):

"Active management of ecosystems to protect, maintain and increase rare threatened and endangered indigenous biodiversity for future generations."

Analysis

241. I do not consider the amendments proposed to SD-EP-03 appropriate as this objective is confined to rare threatened and endangered biodiversity but rather is intended to apply to all indigenous biodiversity. It is unnecessary to include "on going" at the end of this objective, as *for future generations* implies that this is an ongoing process.

SD-EP-04

Submissions

242. Te Hiku Iwi Development Trust (S399) and Manulife Forest Management (NZ) Ltd (S160) support objective SD-EP-04 and request for the objective to be retained as notified (S399.023, S160.012).



243. NZTA (S356) supports objective SD-EP-04 but requests it be amended to clarify the purpose of the objective and how Council anticipates it will be implemented (S356.018).
244. Horticulture NZ (S159) supports objective SD-EP-04 in part but requests it be amended as follows (S159.027) (this amendment is opposed by further submitters FS570.189, FS566.203, FS569.225 and supported by FS151.181):

"Land use practices reverse mitigate climate change by enabling carbon storage and reducing carbon emissions."

245. Federated Farmers (S421) opposes objective SD-EP-04 and requests the following amendment (S421.018) (this amendment is opposed by further submitters FS570.1250, FS346.252, FS566.1264, FS569.1286 and supported by FS24.6):

"Land use practices reverse climate change by enabling carbon storage and reducing carbon emissions. Council supports landowners to adopt climate change mitigation measures through sequestration, new technologies, land use and science."

Analysis

246. In response to NZTA submissions to clarify the purpose of this objective and how Council anticipates it will be implemented, this is not the role of the strategic direction objective, rather it should occur through the relevant chapter objectives and policies.
247. The Horticulture NZ submission which seeks the objective be amended to delete the term reverse and instead use the term mitigate is supported. Climate change is a global issue, it is unrealistic that the Far North District can reverse climate change. The term reversing can also give the impression that climate change will end which is not the case. I am more comfortable with the term mitigate. This recommended amendment helps assist in interpretation, clarifying the intent of this provision and hence its utility throughout the plan.
248. The Federated farmers submission considering how Council should support climate change mitigation is considered to be worded as a policy and therefore considered to not be appropriate in the strategic direction objectives.

SD-EP-05

Submissions

249. Matauri Trustee Limited (S243), NZTA (S356), Te Hiku Iwi Development Trust (S399), Waiaua Bay Farm Limited (S463), and DOC (S364) all support objective SD-EP-05 and request for the objective to be retained as notified (S243.013, S356.017, S399.024, S463.009, S364.021).



250. P S Yates Family Trust (S333), The Shooting Box Limited (S187), Wendover Two Limited (S222), Setar Thirty Six Limited (S168), Bentzen Farm Limited (S167) and Matauri Trustee Limited (S243) all support objective SD-EP-05 in part but request the following amendment to the objective (S333.006, S187.006, S222.005, S168.013, S167.006, S243.015):

"The natural character of the coastal environment and outstanding natural features and landscapes are managed to ensure their long-term protection for future generations, including their restoration."

251. Haititaimarangai Marae Kaitiaki Trust (S394) also support objective SD-EP-05 in part but request the following amendment to the objective (S394.012):

"The natural character of the coastal environment is preserved and outstanding natural features and landscapes are protected managed to ensure their long-term protection for future generations."

252. Forest & Bird (S511) and Kapiro Conservation Trust (S442) both support objective SD-EP-05 in part but request the following amendment to the objective (S511.032, S442.052) (with further submission support from FS164.032, FS404.085, FS570.1603, FS566.1617, FS569.1639 and opposition from FS548.148):

"The natural character of the coastal environment, waterbodies and their margins are preserved, and outstanding natural features and landscapes are identified and managed to ensure their long-term protection for future generations."

Analysis

253. This objective covers off a range of matters of national importance with differing management levels and techniques hence it needs to be broad and generalised. While I agree it does not address all those matters of national importance, as considered earlier in this report the drafting approach taken to these chapters was to identify and respond to those resource management issues considered to be of particular importance to the Far North District, including matters of national and regional importance that are particularly relevant within the district. As such, the content of these chapters intentionally did not traverse every matter of national importance, and replication of the wording in the RMA and higher order documents was specifically avoided.
254. I consider that the second part of this objective '*...to ensure there long-term protection for future generations*' ensures that this policy links back to the NZCPS. The suggested amendment to include waterbodies and their margins is considered to outside the scope of what this objective is trying to achieve.

SD-EP-06



Submissions

255. Te Hiku Iwi Development Trust (S399), Carbon Neutral NZ Trust (S529) and Vision Kerikeri (Vision for Kerikeri and Environs, VKK) (S527) all support objective SD-EP-O6 and request for the objective to be retained as notified (S399.025, S529.119, S527.005).
256. P S Yates Family Trust (S333), Setar Thirty Six Limited (S168), The Shooting Box Limited (S187), NZTA (S356), Wendover Two Limited (S222), Manulife Forest Management (NZ) Ltd (S160), Matauri Trustee Limited (S243), DOC (S364), Bentzen Farm Limited (S167), Forest & Bird (S511) and Kapiro Conservation Trust (S442) all support objective SD-EP-O6 in part but request the following amendment to the objective (S333.007, S168.014, S187.007, S356.019, S222.006, S160.013, S243.016, S364.022, S167.007, S511.033, S442.053):

"Areas of significant indigenous vegetation and significant habitats of indigenous fauna are protected for current and future generations."

Analysis

257. I recommend the multiple submissions seeking amendment to the typing error in this objective are accepted.

New Objectives

Submissions

258. The BOI watchdogs (S354) seek that any objective that would limit dog ownership is deleted (354.015).
259. Forest & Bird (S511) and Kapiro Conservation Trust requests a new objective, *Indigenous biodiversity is maintained* (S511.034, S442.054).

Analysis

260. None of the Natural environment strategic direction objectives specifically limit dog ownership.
261. Objective *SD-EP-O3 Active management of ecosystems to protect, main and increase indigenous biodiversity for future generations* covers off the relief sought the proposed new objective.
262. I recommend these submissions are rejected.

Recommendation

263. I recommend that the submissions seeking to retain SD-EP-O1 are accepted, those that seek amendments are rejected, and aside from renaming the provision, SD-EP-O1 is retained as notified.



264. I recommend that the submissions seeking to retain SD-EP-02 are accepted, those that seek amendments are rejected, and aside from renaming the provision, SD-EP-02 is retained as notified.
265. I recommend that the submissions seeking to retain SD-EP-03 are accepted, those that seek amendments are rejected and aside from renaming the provision, SD-EP-03 is retained as notified.
266. I recommend that the submissions seeking to retain SD-EP-04 are rejected, the submission from Federated Farmer is rejected and the Submission seeking admendment from Horticulture NZ is accepted. The provision is renamed, SD-EP-04 is amended as follows.

SD- ~~EPNE~~-04 -Land use practices ~~reverse~~ mitigate climate change by enabling carbon storage and reducing carbon emissions

267. I recommend that the submissions seeking to retain SD-EP-05 are accepted, those that seek amendments are rejected and aside from renaming the provision, SD-EP-05 is retained as notified.
268. I recommend that the submissions to retain SD-EP-06 are accepted in part, and those that seek a minor typing amendment are accepted by amending SD-EP-06 as follows:

SD- ~~EPNE~~-06 Areas of significant indigenous vegetation and significant habitats of indigenous fauna ~~and~~ are protected for current and future generations."

269. I recommend that submissions and further submissions be accepted, accepted in part or rejected as indicated in Appendix 2.

Section 32AA evaluation

270. The recommended amendments to SD-NE-06 primarily clarify the intent of the provisions. On this basis, no evaluation for these recommended amendments under Section 32AA is required.

271. The recommended amendments to SD-NE-06 for the above recommendation is provided above under analysis of the provision.

5.2.9 Key Issue 9: Other Submissions

Overview

272. A variety of submission points were received on general topics that are included within this strategic direction report these include the following:

- Climate Change
- Urban Design



- Zoning framework
- Strategic Direction Policies
- Other

Climate Change

Submissions

273. VKK (S521), Kapiro Residents Association (S428) and Kapiro Conservation Trust (S443) request amendments to the PDP provisions to implement Council statements on the need to address climate change in all planning and policy (S521.001, S428.001, S443.001).
274. Kapiro Residents Association (S428), Carbon Neutral NZ Trust (S529), VKK (S521) and Kapiro Conservation Trust (S443) request amendments to the PDP provisions that will reduce greenhouse gas emissions related to the activities covered by district plans (S428.003, S529.049, S521.003, S443.003).
275. Kapiro Residents Association (S428), VKK (S521), Kapiro Conservation Trust (S443) and Carbon Neutral NZ Trust (S529) request that the PDP acknowledge that the climate emergency requires a new approach in the district plan immediately (S428.002, S521.002, S443.003, S529.048).
276. Te Rūnanga o Ngāti Rēhia (S599) and NRC (S359) request provisions for water supply and resilience (S599.010, S359.010).
277. Te Rūnanga o Ngāti Rēhia (S599) also request that high intensity development is not enabled unless serviced by a supply network or adequate on-site storage is provided to cater for extended dry spells and droughts (S559.049).
278. NRC (S359) and Te Rūnanga o Ngāti Rēhia (S559) request a climate change section in the Strategic Direction Chapter that outlines how the PDP enables the community to respond to climate change and signal zoning, how overlays and controls on subdivision, use and development are used to minimise risk from natural hazards, protection of high value resources that enable climate change responses or are particularly vulnerable to predicted impacts (such as indigenous biodiversity, elite soils and renewable energy generation) (S359.006, S359.005, S559.007 with Further submission support).
279. Carbon Neutral NZ Trust (S529) request amendments to provisions to implement Council statements on the need to address climate change as outlined below (S529.047):

"FNDC's Long Term Plan consultation (p.5) recognised the importance of coordinating activities to reduce our carbon footprint and find ways to



ensure climate change is addressed in all strategy, planning, policy and decision-making'.

FNDC's Climate Change Road Map 2020 stated that: 'We will operationalise climate change adaptation so it becomes 'business as usual' through our plans and strategies including the Long Term Plan, the District Plan, our Infrastructure Strategy''

280. Te Waka Pupuri Putea Trust (S477) seek that the PDP be amended to be forward-thinking regarding climate-related issues as the geography of their rohe makes them more susceptible to climate change issues and their potential consequences (S477.008, S477.009, S477.010, S477.011 477.012).
281. GE Free Tai Tokerau (S433) request that the PDP be amended where possible to ameliorate climate change while continuing to oppose any outdoor use of GE/GMOs, including risky, controversial, and unproven GE/GMO gene edited grasses, trees, or animals (S433.002).

Analysis

282. In response to the various submissions around Climate change I highlight the following:
 - Climate change is weaved through the strategic objective policies and specifically addressed in the Natural hazards chapter. I note that the RMA s7(i) covers the effects of climate change rather than the contributors to climate change.
 - Climate Policy and initiatives sit outside the district plan. In November 2023, the Council adopted a Climate Action Policy, this policy supports Council and community adaptation and mitigation measures by outline clear goals, strategies, and actions to mitigate greenhouse gas emission, to adapt to changing climatic conditions, and to promote a sustain future for future generations. This includes a commitment to effectively consider climate change in Council decision and processes and to create an emissions reduction plan and report on operational emissions annually.
 - Community level adaptation planning and iwi and Hapu led adaptation support is part of the adopted Te Taitokerau Climate Adaptation strategy.
283. While I acknowledge these submission points that seek amendments to consider climate change generally, there is no suggested wording. In addition, the level of detail required to do this would not sit comfortably within the strategic directions objectives and instead should be addressed through the relevant topic chapters. I recommend this is brought to the attention of the topic specific chapters, and it may be necessary to be rediscussed in other chapters where there is scope to address this. For the



Strategic Direction chapter, I recommend that these submissions are rejected.

Urban Design

Submissions

284. Te Rūnanga o Ngāti Rēhia (S599) requests design guidelines for the Kerikeri town centre to be done in conjunction with the community and hapū (S559.032).
285. Kapiro Residents Association (S427), VKK (S522), Our Kerikeri Community Charitable Trust (S338), Kapiro Conservation Trust (S449) and Carbon Neutral NZ Trust (S529) request amendments to include provisions that support urban design principles for quality and innovative developments that cater for mixed use, mixed dwellings and mixed income levels, whilst protecting and preserving the characteristics of respective townships and the things that communities value (S427.007, S522.007, S338.007, S449.008, S529.007).
286. Our Kerikeri Community Charitable Trust (S338), VKK (S522), Kapiro Residents Association (S427), Kapiro Conservation Trust (S449) and Carbon Neutral NZ Trust (S529) all request the insertion of the Urban Design Protocol and Good Solution Guide 2007 North Shore City Council into the PDP (S338.006, S522.006, S427.006, S449.007, 529.006).
287. VKK (S522), Our Kerikeri Community Charitable Trust (S338), Kapiro Conservation Trust (S449), Carbon Neutral NZ Trust (S529) and Kapiro Residents Association (S427) all request to amend the PDP to maintain and enhance amenity values and include provisions that will protect the traditional and/or distinctive character of townships and rural areas, and other characteristics that are valued by local communities (S522.016, S338.018, 449.025, S529.024, S427.017).
288. Kapiro Residents Association (S427), Our Kerikeri Community Charitable Trust (S338), Kapiro Conservation Trust (S449) and Carbon Neutral NZ Trust (S529) all request to amend the PDP to preserve local character through the control of building types, qualities, quantity and design (S427.018, S338.019, S449.026, S529.025).
289. Our Kerikeri Community Charitable Trust (S274) requests urban design strategies and guidelines and to give effect to these in the PDP (S274.006).
290. Kristine Kerr (S302) seeks amendments to provide for design guidelines for urban design and form, identify a hierarchy of towns and districts with suitable design measures, and plan the specific type of services and facilities to be offered (S302.001, S302.002).
291. Robert Adams (S156) requests urban design overlays and urban design assessments for all of Northland's towns that are compromised such as



Rāwene, Russell, Kawakawa, Mangonui, Kohukohu, and then move on to the other towns (S156.001).

Analysis

292. I agree urban design guidance for the district, would desirable. However, the development of Urban design guidelines for the Far North District would be arduous task as it is not a one size fits approach. It is likely that The Kerikeri / Waipapa spatial plan that is currently under development, would include urban design guidance as part of its implementation.
293. Urban design is sufficiently managed in the PDP through zone objectives and policies around character and amenity. The PDP has been drafted to give effect to the RPS, and a discretionary or non-complying activity must also comply with the RPS. The RPS statement policies and Appendix which guide subdivision use and development.
- *Policy 5.1.1 – "Planned and Coordinated development, where by subdivision, use and development should be located, designed and built in a planned and co-ordinated manner which:*
 - *Is guided by the 'Regional Form and Development Guidelines' in Appendix 2;*
 - *Is guided by the Regional Urban Design Guidelines' in Appendix 2 when it is urban in nature;.....*
294. The provisions in the General Residential and mixed-use zones and the Subdivision chapter allow for a variety of densities, housing typologies and lot sizes. The PDP contains nine scheduled heritage area overlays, with each overlay having specific objectives policies and rules in relation to the unique heritage values, context and landscapes which require protection. Additionally, the Coastal environment overlay includes design control representative of the sensitive environment.

Zoning Framework

Submissions

295. Kapiro Conservation Trust (S449), Carbon Neutral NZ Trust (S529), VKK (S522), and Our Kerikeri Community Charitable Trust (S338) all request to amend the zoning framework to introduce more subzones or precincts as per the National Planning Standards to achieve good connectivity, good functionality and protect character and amenity values (S449.003, S529.003, S522.002, S338.047).
296. Paihia Properties (S344), Sarah Ballantyne and Dean Agnew (S386) Bunnings Limited (S371), McDonalds Restaurants (NZ) Limited (S385), Foodstuffs (363), New Zealand Maritime Parks Ltd (S251) and Ngā Tai Ora - Public Health Northland (S516) request to amend and establish a centre hierarchy to set a clear policy direction for the larger urban areas within



the District, and amend provisions and zoning as necessary to implement the hierarchy that achieves a compact urban form (S344.001, S386.004, S371.001, S385.031, S385.006, S363.006, S251.001, S251.002 S516.007, 516.078).

297. Ngā Tai Ora (S516) request to amend the zoning pattern of larger centres such as Kawakawa, Kaikohe, Omapere, Rāwene, and Kaitaia, with further consideration given to managing adverse effects at the zone interface throughout the District (S516.079).
298. Te Rūnanga o Ngāti Rēhia (S559.001) seek to amend the strategic direction to undertake a feasibility and placemaking study utilising a modeling tool, to model the likelihood of plan-enabled development in Kerikeri-Waipapa to shape the look and feel of the area.

Analysis

299. In response to the various submissions requesting changes to the zoning framework, the section 32 report for urban states in relation to commercial and mixed use zones "*Based upon demand modelling, Council has not identified a need for multiple commercial zones, with the Mixed Use zone accommodating a range of activities*". At this stage, unless further technical evidence demonstrates otherwise, it is difficult to support the creation of additional commercial zones. Council is currently in the process of undertaking an independent housing and business development capacity technical assessment which will provide the evidence base to respond to some of the submission points. This information will be available at the time of the rezoning hearing for example. On balance and in the absence of supporting evidence at this time I recommend these submissions are rejected. As mentioned earlier in this report, outcomes from the updated housing and business assessment will be confirmed through later S42A reports. In response to Te Rūnanga o Ngāti Rēhia submission, as indicated above Council is undertaking further technical work, and the Kerikeri – Waipapa spatial plan is underway. This submission point is therefore accepted in part.

Strategic Direction Policies

Submissions

300. Te Aupōuri Commercial Development Ltd (S339), Willowridge Developments Limited (S250), Bunnings Limited (S371), Paihia Properties (S344), Twin Coast Cycle Trail (S425), McDonalds Restaurants (NZ) Limited (S385), Foodstuffs (S363), Ngā Tai Ora (S516), Top Energy Limited (S483) and New Zealand Maritime Parks Ltd (S251) all request a policy to give effect to the strategic direction objectives (S339.016, S250.002, S371.001, S344.005, S425.005, S385.031, S385.006, S363.006, S363.007, S516.024, S483.026, S251.001, S251.002).
301. Ngā Tai Ora (S516) requests a new policy as follows (S516.029):



"Ensure the application of high quality urban design by requiring subdivision and development to demonstrate how it will contribute to a compact, connected, distinctive, diverse, attractive, appropriate, sustainable and safe urban form."

302. Ngā Tai Ora (S516) also requests the Strategic Direction Section to have policies and to cross reference policies located in other chapters (S516.001).

303. Paihia Properties (S344) and Foodstuffs (S363) request a new policy as follows (S344.006, S363.007):

"To ensure that there is sufficient residential and business development capacity by zoning land where development is feasible and: Is serviced with development infrastructure; or Funding for development infrastructure is identified in the Long Term Plan."

304. Our Kerikeri Community Charitable Trust (S271), VKK (S524) and Carbon Neutral NZ Trust (S529) request a new policy to the Economic and Social Wellbeing – Economic Prosperity section of the PDP as follows (S271.007, S524.007, S529.072):

"To ensure multi modal integrated transport networks by a. Requiring Integrated Transport Assessments at the time of subdivision. b. Ensuring that provision for planned integrated transport networks is made at the time of development. c. Funding for integrated multimodal transport networks is identified in the Long Term Plan"

305. Twin Coast Cycle Trail (S425) and Kapiro Conservation Trust (S446) both seek corresponding policies to be added in relation to SD-EP-O4 (S425.008)

"SD-SP-PX To ensure multi modal integrated transport networks by: a. Requiring Integrated Transport Assessments at the time of subdivision. b. Ensuring that provision is made for planned future transport networks at the time of land use and development." While Kapiro Conservation Trust (S446.007) requests the following policy:

"SD-EP-PX To ensure multi modal integrated transport networks by: a. Requiring Integrated Transport Assessments at the time of subdivision. b. Ensuring that provision for planned integrated transport networks is made at the time of development. c. Funding for integrated multimodal transport networks is identified in the Long Term Plan."

306. Bunnings Limited (S371) requests stronger policy direction with respect to economic growth and development (S371.002).

Analysis

307. The National Planning standards include the mandatory requirement for district-wide strategic direction chapters to include policies addressing the



key strategic or significant resource management matters identified unless those policies are better located in other more specific chapters.

308. There is no indication in the section 32 report as to why the chapter does not include policies, but it is reasonable to assume that the various PDP portfolio writers were satisfied that the policies were better located in the respective topic chapters. I do not support the inclusion of policies in the strategic direction chapter.
309. While I recommend all these submission points are rejected, I consider that each submission point should be reflected on by the chapter authors to ensure there is not any necessary changes to the relevant zone or chapter policies.

Other

Submissions

310. Te Waka Pupuri Putea Trust (S447) request that the PDP be amended to ensure that it enables, permits and promotes solutions to endemic and poverty related issues such as housing and historic underinvestment in critical infrastructure that disproportionately affect whanau, hapu and iwi, as well as providing opportunities for adequate environmental protection and enhancement, commercial return and regional economic growth (S477.002).
311. Ngā Tai Ora (S516) requests that the objectives within the strategic direction sections be amended to be consistent with the language structure/drafting format of objectives in other chapters of the PDP (S516.001). They further seek to amend the strategic direction section/s to indicate the balance and trade-offs between often conflicting matters of national, regional and local importance; including undertaking background analysis as per section 32(1)(a) of the RMA to determine the extent to which the objectives are the most appropriate way to achieve the purpose of the RMA (S516.002).
312. Ngā Tai Ora (S516) also seek to amend all Strategic Direction objectives as necessary to refer to sustainable development and community health and safety (S516.023). They further request a new objective as follows (S516.027):

"Avoid reverse sensitivity effects between incompatible activities and zones."

Analysis

313. The Strategic direction objectives were drafted to bring together the PDP and Council's Long term Strategic direction as represented in FN2100. Council maybe undertaking a review of FN2100 this year, but at the time of writing this report a timeframe for this work could not be confirmed. For this reason, the objectives were not necessarily drafted in a similar way to



that of the plan wide objectives and policies. While they seek to cover all the key issues in the district they do not respond to all issues and all aspects of the RMA. The direction and further detail is included in the overlay and zone chapters where they have been appropriately assessed as per section 32(1)(a) of the RMA.

314. I consider that community health and safety is addressed throughout the strategic direction objectives the focus of the strategic objectives is that of the four wellbeings. As mentioned previously in this report, the strategic objectives do not necessarily need to include all sections and replicate the RMA.
315. I accept that reverse sensitivity is a relevant issue to the district. However, I do not consider that the protection from reverse sensitivity should explicitly be included in the Strategic direction objective. Rather I consider it more appropriate to include direction relating to reverse sensitivity in other chapters within the PDP, including where such direction is necessary to achieve the strategic direction. For example, I note that direction is included in RPROZ-P3 in relation to managing sensitive activities in the Rural Production zone.

Recommendation

316. For the above reasons, I recommend that the submission points relating to climate change, urban design, strategic direction policies and other matters be rejected.
317. I recommend the submissions regarding the zoning framework also be rejected, except that of Te Rūnanga o Ngāti Rēhia, which is accepted in part. Although this point has been accepted in part at this stage there are no changes to the PDP, and accepting in part this submission point just acknowledges that there is work in progress on the spatial plan for the Kerikeri/ Waipapa area.
318. I recommend that the submissions and further submission points be accepted, accepted in part or rejected as per Appendix 2.

Section 32AA evaluation

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

6 Conclusion

320. This report has provided an assessment of submissions received in relation to the Strategic Directions chapter. The primary amendments that I have recommended relate to:

- Deletion of duplication in the chapter overviews



- Addition of the term 'additional infrastructure' to the urban form and development objective, and inclusion of the term in the definitions chapter.
- Minor amendments to objective wording to
 - i. Inclusion of 'repair' in relation to infrastructure objective
 - ii. Deletion of the term reverse and addition of the term mitigate in relation to climate change
 - iii. Correct minor typing errors
- Correction to address duplication in provision reference

321. Section 5.2 considers and provides recommendations on the decisions requested in submissions. I consider that the submissions on the Strategic Direction chapter should be accepted, accepted in part, rejected or rejected in part, as set out in my recommendations of this report and in Appendix 2.

322. I recommend that provisions for the Strategic Direction matters be amended as set out in the Strategic Direction in Appendix 1 below for the reasons set out in this report

Recommended by: Tammy Wooster, Manager- Integrated Planning, Far North District Council

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

Date: 29 April 2024