



## **SECTION 42A REPORT**

Officer's written right of reply 26 August 2024

### **Hearing 5 – Public Access and Activities on the Surface of Water**

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## **1 Introduction**

### **1.1 Background**

1. My full name is Jaimee Maree Cannon. I am the writer of the original Section 42A Reports for Hearing 5 on the Proposed District Plan: Public Access and Activities on the Surface of Water.
2. In the interests of succinctness, I do not repeat the information contained in Section 2.1 of the Section 42A report and request that the Hearings Panel ("the Panel") take this as read.

## **2 Purpose of Report**

3. The purpose of this report is primarily to respond to the evidence of the submitters and provide my right of reply to the Panel. In this Report I also seek to assist the Panel by providing responses to specific questions that the Panel directed to me during the hearing, under the relevant heading.

## **3 Procedural matters**

4. At the hearing I verbally corrected an error in the Public Access S42A Report. Paragraph 55 of the Public Access S42a Report should have read that I was recommending rejecting the submissions seeking esplanades for land use consent applications, and that Policy PA-P5 was recommended to be retained as notified, for the reasons stated in paragraphs 49 to 54 of that S42A Report. In Key Issue 1 of this Report, I recommend accepting the submissions<sup>1</sup> in part (further explained in Key Issue 1).
5. The Hearing Panel sought clarification on the nature of submissions on relating to Subdivision policies and standards (Policy SUB-P7 and Standard SUB-S8) that will be addressed at the Subdivision topic hearing. A summary of the submissions on Standard SUB-S8 and related Policy SUB-P7 are provided in **Appendix 4** to this Report. The submissions primarily provide support for PDP policies and rules that require the creation of esplanade reserves associated with subdivision, and seek that the relevant subdivision provisions (Objective SUB-O4, Policy SUB-P7, Rules SUB R1, R3, R5 and R6 and Subdivision Standard SUB-S8) are retained or retained with amendments to include reference to esplanade strips. The other matters raised have been addressed in the Public Access S42A Report, including:
  - a) Requests that esplanade reserves/strips are created when subdivision creates lots of 4ha or more (addressed in paragraphs 173 – 175 of the Public Access S42A Report).

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<sup>1</sup> submissions S272.016 S272.017, S445.015, S445.016, S523.017, S523.018, S529.186 and S529.187.



- b) Requests that esplanade reserves/strips are taken for land use consent applications (addressed in paragraphs 47 to 54 of the Public Access S42A Report)
  - c) Requests for inclusion of clauses in provisions that will actively protect indigenous species that are classed as threatened or at risk under NZ Threat Classification System and areas with significant ecological values (addressed in paragraphs 57 to 62 of the Public Access S42A Report and Key Theme 2 of this Written Reply Report).
6. Requested amendments to Policy SUB-P7 and SUB-S8 that have not been addressed as part of the Public Access topic will be addressed at the Subdivision topic hearing.

#### **4 Consideration of evidence recieved**

7. I have only addressed those sections and evidence where I consider additional comment is required. I have grouped these matters into the following headings:
- a) Key Issue 1: Voluntary methods for esplanades
  - b) Key Issue 2: Protection of ecological values
  - c) Key Issue 3: Esplanade Priority Areas
  - d) Key Issue 4: Width of Esplanade Strips
  - e) Key Issue 5: Private Property Rights.
8. In order to distinguish between the recommendations made in the s42A Report and my revised recommendations contained in **Appendix 1** of this report:
- a) Section 42A Report recommendations are shown in black text (with underline for new text and ~~strikethrough~~ for deleted text); and
  - b) Revised recommendations from this Report are shown in red text (with red underline for new text and ~~strikethrough~~ for deleted text)
9. For all other submissions not addressed in this report, I maintain my position set out in my original s42A Reports.



## 4.1 Key Issue 1: Voluntary methods for esplanades

### Overview

Relevant Document	Relevant Section
Section 42A Report	Key Issue 1 – Esplanade Reserves for land use applications From Paragraph 47
Statement of evidence from Vision Kerikeri, Our Kerikeri Community Trust, Carbon Neutral Trust, and Kapiro Conservation Trust	Heading 4: Land use consents and esplanade Heading 6: Need for financial and/or development contributions. Hearing 7: Other methods for creating esplanade

### Analysis

10. Vision Kerikeri, Our Kerikeri Community Trust, Carbon Neutral Trust, and Kapiro Conservation Trust (“the Kerikeri community group submitters”) are seeking that esplanade reserves are required for land use consent applications (not just subdivision), including for retirement villages. The PDP approach does not require esplanade reserves for land use activities, as these can only be taken as a financial contribution by way of a condition on a land use consent<sup>2</sup> if there are rules in the District Plan about financial contributions.
11. I understand that the Council (elected members) have resolved that a Financial Contributions chapter is to be prepared<sup>3</sup>, and a decision is still to be made on timing and process for this chapter (Plan Variation or Plan Change). Because the PDP does not currently include financial contributions, esplanade reserves cannot be taken as a financial contribution by way of a condition on a land use consent. However, voluntary creation of esplanade reserves for land use activities is encouraged for relevant land use activities in the PDP through Policy PA-P5. In addition, there are other methods to secure public access outside of the District Plan and RMA processes including easements, marginal strips, access strips, or negotiated agreements with landowners.
12. The Kerikeri community group submitters have acknowledged that Council is working toward adoption of financial or development contributions. In the meantime they have sought that the Public Access policies could, at a minimum, specifically encourage other methods such as voluntary contribution (without Council compensation) and third party funding. They note that for land use activities or when subdivision creates lots of 4 ha or more, there are opportunities to create esplanades in the following situations:

<sup>2</sup> under S108(9) of the RMA.

<sup>3</sup> [Agenda of Ordinary Council Meeting - Thursday, March 14, 2024 \(fndc.govt.nz\)](https://www.fndc.govt.nz/agenda-of-ordinary-council-meeting-thursday-march-14-2024)



- a) a third party provides funds to compensate the landowner for the land. A community group, for example, might wish to raise funds to compensate the landowner.
- b) as part of a development agreement.

13. I consider that the current policy framework already provides opportunities for voluntary creation of esplanades including opportunities for creation of an esplanade reserve or strip to be negotiated as part of a subdivision consent process (when lots over 4 ha are created) or land use consent process through a development agreement or when third parties provide funds to compensate the landowner for creating the esplanade. For example, the provisions:

- a) Require the creation of esplanade reserves or esplanade strips to and along the coastal marine area and waterbodies where it meets one or more of the criteria in Policies PA-P2 and PA-P4 (noting that this policy would be considered on a case-by-case basis during a subdivision consent application, including when lots greater than 4 ha are created).
- b) Provide guidance on utilising access strips, designations and other mechanisms available to secure land or easements for public access where not otherwise achieved through esplanade reserve requirements (Policy PA-P1(c)) and encourages the voluntary creation of esplanade reserves or esplanade strips for land use activities when one or more of the criteria in PA-P5 are met.
- c) Contains the following guidance in the Overview section of the Public Access Chapter:

*At the time of subdivision, Council will consider the opportunity to take land adjacent to the coastal marine area or waterbodies for an esplanade reserve. The requirements for esplanade reserves will be implemented in accordance with section 77 and Part 10 of the RMA. In some circumstances, Council may determine that an esplanade strip is more appropriate. Council will consider the effects of climate change, including sea-level rise and risks of natural hazards when making decisions.*

14. The submitters have provided supplementary information following the hearing to support their submission, including the following suggested wording to insert to the overview section of the Public Access chapter:

*In cases where esplanade is not required by DP provisions, esplanade may be created by other methods. For example, a landowner may agree to provide an esplanade reserve or strip voluntarily without compensation (RMA s235, s237B, s237E, s237F, s237G; LGA s200(2)). A reserve may also be funded by a third party, provided that same reserve is not counted as a development contribution (LGA s200(1)(c)).*



*This allows benefactors or community groups to raise funds to create esplanade reserves in situations not covered by DP requirements.*

### Recommendation

15. Although the Public Access chapter (with recommended amendments) already provides opportunities for “other methods” as described above, there is value in making an amendment to the overview of the Public Access chapter to explain to plan users that these other methods are available.

16. I recommend the following additional wording is inserted to the overview chapter:

*In cases where an esplanade is not required by the District Plan provisions, esplanades may be created by other methods. For example, a landowner may agree to provide an esplanade reserve or strip voluntarily (section 235 of the RMA) or a third party (such as a community group) may assist with funding a reserve.*

17. I consider that reference to the various sections of the RMA and LGA as suggested by the submitters is not necessary as some of the sections are not directly relevant (e.g. S237B of the RMA relates to access strips). This level of detail, if necessary, could be included in guidance outside of the District Plan, in a Practice Note for example.

18. For the above reasons I recommend accepting in part submissions S272.016 S272.017, S445.015, S445.016, S523.017, S523.018, S529.186 and S529.187 (as set out in **Appendix 2**), insofar as the provisions are not amended to require esplanade reserves for land use consents, however they already provide for “other methods” of creating esplanades, and the overview section is amended to provide guidance on these matters.

### Section 32AA Evaluation

19. The recommended amendment to the overview section is appropriate because it provides the plan users with guidance and highlights that “other methods” are available to secure esplanades in cases where an esplanade is not required by the District Plan provisions.

## 4.2 Key Issue 2: Protection of ecological values

### Overview

Relevant Document	Relevant Section
Section 42A Report	Key Issue 2: Protection of ecological values From Paragraph 57
Statement of evidence from Vision Kerikeri, Our Kerikeri Community Trust,	Heading 8: Esplanade and protection of areas with significant ecological values



Relevant Document	Relevant Section
Carbon Neutral Trust, and Kapiro Conservation Trust	

### Analysis

20. The Kerikeri community group submitters consider that the PDP provisions on the protection of indigenous biodiversity are not sufficient, particularly the aspects identified in Appendix 5 of the Northland Regional Policy Statement. The submitters are seeking an amendment to Objective PA-O2 as follows:

*'Public and customary access to and along the coastal marine area and waterbodies ~~assists with the management of~~ is managed in a way that addresses natural hazards, and supports the preservation of natural character, indigenous biodiversity, historic heritage, cultural and landscape values.*

21. In my Section 42A Report I did not support amendments to the Public Access chapter to include further provision for protection of indigenous species classified as threatened or at risk because I considered that the Ecosystems and Indigenous Biodiversity chapter of the PDP provides sufficient protection of indigenous species.

22. I do however acknowledge that esplanade reserves can play an important role in protecting areas with significant ecological values outside of urban areas. Section 229 of the RMA states the purpose of esplanade reserves which includes protection of conservation values, public access or public recreational use. Policy PA-P2 also recognises the role of esplanades in protecting, maintaining or enhancing ecological or natural values.

23. The intent of the specific relief sought by the submitters to Objective PA-O2 is supported however I consider that the outcome sought could be more clearly expressed. Specifically, the District Plan seeks to "provide" public access rather than "manage" public access, and public access is to be "provided" in a way that "considers" natural hazard risks, rather than specifically "addressing" natural hazard risks.

### Recommendation

24. I recommend that the abovementioned requested changes are accepted in part and submissions S272.023, S272.024, S445.017, S445.018, S523.019, S523.020, S529.192 are accepted in part. I recommend Objective PA-O2 is amended to read as follows:

*Public and customary access to and along the coastal marine area and waterbodies is provided in a way that considers<sup>4</sup> ~~assists with the~~*

<sup>4</sup> Submissions S272.023-024, S445.017-018, S523.019-020 and S529.192-193.



*management of natural hazard risks, and supports<sup>5</sup> the preservation of natural character, indigenous biodiversity, historic heritage, cultural and landscape values.*

25. I have made these recommended amendments to the provisions in **Appendix 1** to this Report, and the recommended decisions on submissions in **Appendix 2** to this report.

### **Section 32AA Evaluation**

26. A Section 32AA evaluation for the recommended amendment to Objective PA-O2 is provided below:

- a) The recommended amendments improve the effectiveness and efficiency of the PDP by more clearly articulating the outcome sought.
- b) The benefits of the recommended amendment are that public access is provided in a way that considers natural hazard risks, and supports the preservation of natural character, indigenous biodiversity, historic heritage, cultural and landscape values.
- c) There are few costs associated with the recommended change because the outcome sought as expressed in the amended objective wording is consistent with the existing recommended policy direction of the Public Access Chapter (e.g. Policy PA-P2 requires creation of esplanade reserves where it (a) protects, maintains or enhances existing ecological and/or natural values and (g) does not increase the risk of natural hazards).
- d) It is acknowledged that esplanade reserves contribute to the protection of ecological values and maintaining indigenous biodiversity, therefore the risks of accepting the recommended amendments are very low.
- e) The Ecosystems and Indigenous Biodiversity chapter remains the primary chapter of the PDP that provides protection of areas of indigenous vegetation and significant habitats of indigenous fauna, which avoids unnecessary duplication or possible conflict between plan provisions, and achieves effective plan integration.

## **4.3 Key Issue 3: Esplanade Priority Areas**

### **Overview**

<b>Relevant Document</b>	<b>Relevant Section</b>
Section 42A Report	Key Issue 3: Esplanade Priority Areas From Paragraph 65

<sup>5</sup> Submissions S272.023-024, S445.017-018, S523.019-020 and S529.192-193.





Relevant Document	Relevant Section
Statement of evidence from Vision Kerikeri, Our Kerikeri Community Trust, Carbon Neutral Trust, and Kapiro Conservation Trust	Heading 9: Removal of Esplanade Priority Areas from Planning Maps

## Analysis

27. The Kerikeri community group submitters have sought the re-instatement of Esplanade Priority Areas because:
- a) the Kerikeri-Waipapa area is experiencing rapid growth and esplanade reserves play an important role in improving connectivity, active transport and green corridors; and
  - b) Esplanade priority mapping helps to provide transparent, consolidated land use/planning information for Council staff, landowners, developers and others.
28. The submitters have also sought that Esplanade Priority Areas should also be included for any other communities in the district that wish to identify Esplanade Priority areas.
29. In my Public Access S42A Report I recommended that these areas (which were identified in the early 2000s as part of the Kerikeri Structure Plan work, and introduced to the Operative District Plan (ODP) in 2004) are not included on planning maps for reasons stated in paragraph 74 of the S42A Report, including reservations due to uncertainty on the 'relevance' of these areas (which have not been comprehensively reviewed in the past 15-20 years), and because approximately 70% have already been 'activated' and are vested as Council reserves. In addition, in most cases, for the 30% of areas that are not already activated (identified in Table 1 and Appendix 3 of the Public Access S42A Report), future subdivision of this land will trigger the requirement for a 20-metre-wide esplanade reserve<sup>6</sup> even though it is not identified as an 'Esplanade Priority Area' on planning maps. I contended that this method was appropriate because it provides consistency in approach throughout the District, acknowledging that Esplanade Priority Areas of the ODP were only identified in the Kerikeri area and there are other parts of the Far North District with greater "parks poverty" (i.e. greater need for Open Spaces).

<sup>6</sup> Standard SUB-S8. When lots less than 4ha are created adjacent to the waterbody, or where lots larger than 4 ha are created Council has the option of requiring an esplanade reserve as a condition of subdivision consent (Section 108(f) and s220(1)(aa) of the RMA).



30. However, I acknowledge the points raised by submitters at the hearing that:

- a) The Esplanade Priority Areas indicates a visual representation of Council interest in future esplanade provision, which may assist to prompt discussions for voluntary creation of esplanades in circumstances where they are not required by the District Plan (e.g. land use consent applications or subdivision of land creating allotments over 4 ha in area).
- b) Although current Council budgets do not include provision for purchasing of esplanade reserves or strips, this does not mean that future Council budgets over the life of the PDP will not make specific provision for purchasing of esplanades, especially considering Council is likely to start taking contributions in some form.

31. I also recognise that an Esplanade Priority Areas layer can be useful to signal Council's interest in the land for a future esplanade which can help to inform decisions on land use (e.g. ensuring that any proposed buildings are sufficiently setback from the future esplanade reserve so new buildings do not compromise future public access and connectivity).

32. Since the hearing I have discussed these matters with Ms Robin Rawson (Council Parks & Reserves Planner), and Azman Reuban (Senior Strategic Planner – Growth Planning and Placemaking). Mr Reuban has since confirmed that the Kerikeri-Waipapa Spatial Plan (which is expected to be adopted by Council in mid-2025) will identify and map "blue green networks" and the "implementation actions" of the Kerikeri-Waipapa Spatial Plan will identify how the esplanade areas can be secured. The public will have the opportunity to influence the location of the "blue green networks" through consultation on the Draft Spatial Plan, which I understand will occur in early 2025. The esplanade areas that are identified through this process will depend on the preferred growth scenario and may not include all 30% of the remaining esplanade priority areas (that have not yet been 'activated'), however the risks of not identifying certain areas as esplanade priority are low, considering that subdivision of any land not identified will likely trigger the requirement for a 20-metre-wide esplanade reserve<sup>7</sup> even though it is not specifically identified as an 'Esplanade Priority Area'.

33. At this stage I consider that it is not appropriate for the remaining 30% of Esplanade Priority Areas to be identified on the Planning maps of the PDP given their appropriateness and relevance will be reviewed through the Kerikeri-Waipapa Spatial Plan. However, if the Panel is not satisfied with Council officers' recommendation, there is the option of identifying Esplanade Priority Areas as a 'non-statutory' information layer on the planning maps of the PDP.

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<sup>7</sup> Standard SUB-S8. When lots less than 4ha are created adjacent to the waterbody, or where lots larger than 4 ha are created Council has the option of requiring an esplanade reserve as a condition of subdivision consent (Section 108(f) and s220(1)(aa) of the RMA).



## Recommendation

34. I recommend that the submissions<sup>8</sup> seeking to insert Council mapped esplanade priority layers in the PDP are rejected. Esplanade Priority Areas do not need to be identified in the PDP because the Kerikeri-Waipapa Spatial Plan will identify and map esplanade areas as part of the envisioned “blue green networks”. The “implementation actions” of the Kerikeri-Waipapa Spatial Plan will also identify how the esplanade areas can be secured (i.e. activated).

## Section 32AA Evaluation

35. No change to the provisions is recommended at this stage, therefore a Section 32AA evaluation is not required.

## 4.4 Key Issue 4: Width of Esplanade Strips

### Overview

Relevant Document	Relevant Section
Section 42A Report	Key Issue 7: Esplanade Strips From Paragraph 130

### Analysis

36. In the Public Access Section 42A Report (Key Issue 7) I recommend inserting reference to ‘Esplanade Strip’ to Policies PA-P1, P2, P3 and P5 and a consequential amendment to insert reference to ‘esplanade strip’ into Subdivision Standard SUB-S8.

37. Commissioner Scott asked me to confirm whether any submissions on the Public Access topic had sought amendments to provisions to enable esplanade reserves or strips larger than 20m in width. I can confirm that there are no submissions seeking amendments to provisions or seeking a default width for esplanades of larger than 20m. Therefore there is no scope to consider a default width larger than 20m.

38. Commissioner Kensington also sought that I clarify whether a default 20m wide esplanade strip (as recommended in Subdivision Standard SUB-S8) is appropriate, in discussions with Ms Trinder, the reporting officer for the Subdivision topic and Ms Rawson, Councils Parks & Reserves Planner.

39. I have discussed the default width of 20m with Ms Trinder and Ms Rawson and we consider that a default 20m width for esplanade strips in Subdivision Standard SUB-S8 is appropriate within the Far North District context because:

<sup>8</sup> S271.019, S524.019, S425.037, S446.018



- c) S232(1) of the RMA states that esplanade strips may be required by a rule in a plan when land is subdivided, and the width of an esplanade strip shall be specified in a rule in a District Plan.
  - a) When esplanade strips are created in the Far North District, they are generally in rural areas, and generally 20 metres wide (however occasionally the width can be reduced to 10 metres where there are constraints).
  - b) the default width of 20m specified in Standard SUB-S8 does not prevent a larger width being provided in certain circumstances through the subdivision consent process (determined on a case-by-case basis).
  - c) In circumstances where a width less than 20m is appropriate, Council can consider the circumstances on a case-by-case basis, through the resource consent process, taking guidance from Policy PA-P3.
40. Following the hearing Ms Rawson also identified that further guidance would be helpful in the advice notes of the Public Access chapter to acknowledge that the purpose of esplanade reserves or strips goes beyond public access (considering S229 of the Resource Management Act), and that any application to waive the requirement for, or reduce the width of, an esplanade specified in SUB-S8 would be considered against those matters (S229 of the RMA) in addition to Policy PA-P3. Submission S271.020 and others<sup>9</sup> provide scope for this recommended change. I have recommended additional wording to the advice note 3 as follows:

*The rules and standards relating to subdivision and the creation of esplanade reserves or esplanade strips<sup>10</sup> are located in the Subdivision chapter of the Plan. Any application to waive the requirement for, or reduce the width of, an esplanade specified in SUB-S8 will be considered against the purposes of esplanade reserves and esplanade strips in Section 229 of the Resource Management 1991 and Policy PA-P3<sup>11</sup>.*

### **Recommendation**

- 41. In general, I maintain my position that it is appropriate to insert reference to esplanade strips to the relevant provisions and a default width of 20m is appropriate. A Section 32AA evaluation for the provision of esplanade strips is provided in paragraphs 145 to 148 of the S42A Report.
- 42. The Reporting officer for Subdivision, Ms Trinder, will need to consider whether Policy SUB-P7 within the Subdivision chapter is necessary and appropriate, and will address submissions seeking to insert reference to esplanade strips to Policy SUB-P7 as part of her Subdivision S42A Report.

<sup>9</sup> Addressed in Key Issue 4: Waiving of esplanade requirements of the Public Access S42A Report.

<sup>10</sup> Submission S98.004 (consequential amendment)

<sup>11</sup> Submission S271.020 and others.



Ms Trinder is aware of the recommendations in this Report and will seek to achieve consistency and effective integration between the provisions of the Subdivision and Public Access chapters.

#### 4.5 Key Issue 5: Private Property Rights / Public access over private land

##### Overview

Relevant Document	Relevant Section
Section 42A Report	Key Issue 8: Private Property Rights From Paragraph 149
Statement of Evidence of Jo-Anne Cook-Munro of Northland Federated Farmers of NZ (Incorporated)	Paragraph 18 to 38

##### Analysis

43. Federated Farmers seeks a new objective and policy recognising private property rights, and that the overview of the public access chapter is amended to include an advice note, highlighting that access is not available across private land unless allowed by the landowner. Federated Farmers have concerns about trespassing, and seek that access across private property is limited when access will be unsafe or will disrupt farming activities. Federated Farmers have not provided suggested wording for the advice note they have requested.
44. I acknowledge that there is no general right of public access across private land, and that farmers may have valid reasons to deny access across their private land. Owners of private land have the right to exclusive occupation and enjoyment of that land, and I understand that this right is enforceable under the provisions of the Trespass Act 1980.
45. In some circumstances, it appears that public access private farmland using unformed legal roads (i.e. paper roads), which legally provides public access to a particular area or feature. Unformed legal roads may only be identified on survey plans and/or Council GIS maps and are not always readily identifiable on the ground. When esplanade strips are involved, public access is also legally provided for, however esplanade strips can have limitations written into the instrument (for example, to restrict public access during calving season).



46. In my view the Public Access chapter is appropriate and consistent with the outcomes sought by the relevant higher order direction<sup>12</sup>. Restricting the public from entering and using private land, where there is no public access mechanism in place is beyond the scope of the District Plan. Therefore, it is not necessary for the PDP to include an objective and policy recognising private property rights or an advice note explaining that landowner permission is required to access private land. I consider that there are more effective means to advise the community of these requirements and address the concerns raised (outside of the District Plan) for example, erecting “no trespassing” signage.

### **Recommendation**

47. I retain the position set out in paragraph 158 of the Public Access S42A Report, which is that submissions S421.060, S421.163 and S421.169 are rejected and the provisions are retained as notified (except as amended in response to other submissions as stated elsewhere in this Report).

#### **4.6 Additional Information / Questions from the Hearing Panel**

48. Paragraph 98 – 101 of my Section 42A Report for Public Access refers to legal advice from Simpson Grierson confirming that it is not legally possible to transfer an esplanade strip to a hapū under the RMA. As requested by the Panel I have provided a copy of this legal advice (received by email on 13 June 2024) as **Appendix 3** to this Report.

## **5 Conclusion**

49. This Report provides my Written Reply to the matters raised by submitters and the Hearing Panel at Hearing 5 – Activities on the Surface of Water and Public Access of the Far North Proposed District Plan.

50. I consider that the submissions on the Public Access should be accepted, accepted in part, rejected or rejected in part, as set out in **Appendix 2** to this Report.

51. I recommend that provisions for the Public Access are amended as set out in the Public Access Chapter in **Appendix 1** to this Report, for the reasons set out in this report and the corresponding Section 42A Report.

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<sup>12</sup> Resource Management Act 1991, New Zealand Coastal Policy Statement 2010, Northland Regional Policy Statement 2016



**Recommended by:** Jaimee Cannon, Principal Planner, Boffa Miskell Limited

**Reviewed by:** Robin Rawson, Parks and Reserves Planner, Far North District Council

A handwritten signature in black ink, appearing to read "J.P. Wood". The signature is written in a cursive style with a horizontal line crossing through the middle of the letters.

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**Approved by:** Tammy Wooster – Manager Integrated Planning, Far North District Council.