

# Ngā Tai Ora – Submission on PDP

**Ngā Tai Ora**

PUBLIC HEALTH NORTHLAND

Promote Protect Prevent

**To:** Far North District Council (**FNDC**)

**Re:** Submission on Proposed Far North District Plan (**PDP**)

**Full name:** Ngā Tai Ora – Public Health Northland (**Ngā Tai Ora**) Attn: Gavin De Klerk

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**Date:** 21 October 2022

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## Submission Information:

This is a submission on the Proposed Far North District Plan (**PDP**).

Ngā Tai Ora could not gain an advantage in trade competition through this submission.

The specific provisions of the Plan Changes that Ngā Tai Ora submission relate to are attached.

Ngā Tai Ora seeks amendment to the specific provisions as listed in the attached document. The reasons are provided in the attached document.

The decisions that Ngā Tai Ora wishes Far North District Council (**FNDC**) to make to ensure the issues raised by Ngā Tai Ora are dealt with are also contained in the attached document.

Ngā Tai Ora wishes to be heard in support of this submission.

Gavin De Klerk

Ngā Tai Ora - Public Health Northland

**Te Whatu Ora****Health New Zealand**

Te Tai Tokerau

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## 1.0 Introduction

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Te Whatu Ora – Health New Zealand leads the day-to-day running of the health system across New Zealand, with functions delivered at local, district, regional and national levels. Te Whatu Ora undertakes the operational functions of the Ministry of Health, including the management of all health services, including hospital and specialist services, and primary and community care. Te Whatu Ora will also be responsible for improving services and outcomes across the health system. We will do this in partnership with Te Aka Whai Ora - Māori Health Authority.

Te Whatu Ora has statutory obligations under the Pae Ora Act 2022, New Zealand Public Health and Disability Act 2000 and the Health Act 1956 to improve, promote and protect the health of people and communities of Aotearoa New Zealand.

Within Te Whatu Ora sits the National Public Health Service (**NPHS**) which delivers national, regional and local programmes of health promotion, protection and prevention. The goals of the NPHS, which includes Ngā Tai Ora Public Health Service (a sub-group under Te Whatu Ora and the party making this submission), are to improve population and public health with an emphasis on health equity, particularly for Māori, Pacific peoples, disabled peoples, and other population groups that continue to experience inequitable health outcomes. As the founding document of Aotearoa New Zealand, Te Tiriti o Waitangi represents an agreement between Māori and the Crown. Māori are afforded equity and protection of health as a result of this document and as a Crown agent we honour our responsibilities to Te Tiriti o Waitangi.

This submission covers matters addressed by the FNDC, Proposed District Plan (**PDP**) that have potential health effects on people and communities in the Far North District. Specific points of submission are detailed in **Attachment 1**, whilst general feedback is detailed in Section 2 below.



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## 2.0 General Feedback

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This submission covers matters addressed by the PDP that have potential health effects on people and communities. Ngā Tai Ora is providing this feedback to achieve a reduction of adverse health effects and promote positive public health outcomes for people and communities in the Far North District. Specific relief sought is detailed in **Attachment 1**.

## 2.1 Strategic Direction

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Ngā Tai Ora have concern with the way in which strategic direction for the Far North District Council has been expressed in the PDP. Ngā Tai Ora consider that the general language structure and drafting of the strategic direction objectives are inconsistent with other chapters of the PDP. The strategic direction chapters do not include policy and do not contain clear cross references to relevant policy located in other chapters. **S516.001**

Under the National Planning Standards, the strategic direction provisions are key to understand the balance and trade-offs between often conflicting matters of national, regional and local importance. Ngā Tai Ora considers that the strategic direction should be more directive to understand the balance being struck and note that the proposed strategic direction objectives are not supported by any section 32 evaluation which considers the proposed objectives against 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. This absence of section 32 evaluation for the strategic direction is considered to be a significant flaw in the PDP preparation. **S516.002**

In addition to the above, Ngā Tai Ora has made specific requests in **Attachment 1** for stronger and clearer strategic direction on:

- **Urban Consolidation and Intensification:** Ngā Tai Ora endorses enabling urban consolidation and intensification of existing centres / settlements while avoiding sprawling into productive rural areas. A compact urban form results in efficiencies in the provision of public transport, public amenities and community cohesion, and can ultimately achieve positive public health outcomes where healthy planning principles are applied. Ngā Tai Ora note that FNDC have not released section 32 evaluation



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which considers the suite of zones proposed and PDP does not include any form of direction by way of mapping, policy to set a clear hierarchy of centres. There is no identification of small, medium or large centres, or rural/coastal settlements versus larger towns. Ngā Tai Ora consider this to be a significant flaw in the plan, and have concern that the lack of strategic direction and growth aspirations will fail to ensure the continued establishment of consolidated, vibrant urban environments that achieve positive health outcomes for communities.

- **Provision of Infrastructure:** Ngā Tai Ora note that the PDP does not include a separate Three Waters chapter to manage the provision of three waters infrastructure, while the draft infrastructure chapter focuses network utility providers with little regard for three waters infrastructure. Ngā Tai Ora, consider that it is important to ensure provision of sustainable and safe water supply, wastewater and stormwater systems (three waters systems), which are essential for the health and wellbeing of the Far North population. Adequate provision of and access to three waters systems plays a major role in everyday lives in enhancing well-being of communities, impact on quality of life and overall health.
- **Sustainable Development and Health and Safety:** Section 5(1) of the Resource Management Act 1991 states that the purpose of the Act “is to promote the sustainable management of natural and physical resources”, and section 5(2) defines sustainable management which includes enabling people to provide for their health and safety. The Strategic direction objectives do not explicitly mention sustainable development and community health and safety. Ngā Tai Ora consider that sustainable development is a blueprint to promote, improve and protect community well-being by addressing the interconnected social, environment, and economic causes. The Strategic Direction chapters sets out the overarching direction for the District Plan, as such the objectives should refer to sustainable development and community health and safety.
- **Regionally Significant Infrastructure:** The Strategic Direction chapters do not contain objectives and policy which give effect to objective 3.7 Regionally Significant Infrastructure of the Northland Regional Policy Statement. Ngā Tai Ora support recognition and promotion of the benefits of regionally significant infrastructure throughout the Far North District, particularly the importance of public hospitals.



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- **Provision of Public and Active Modes of Transport:** Ngā Tai Ora consider that the District Plan should encourage and facilitate a transition to greater provision of public and active modes of transport. This is crucial for maintaining and enhancing the accessibility and safety for people and communities. It is also important that strategic direction is provided regarding integrating land use and transport planning to achieve greater connectivity for people and communities as an overall principle.
- **Reverse Sensitivity:** Ngā Tai Ora consider that reverse sensitivity is a significant resource management issue with regards to public health and wellbeing. Locating sensitive activities (e.g., residential activities) adjacent to activities that create adverse nuisance effects (e.g., dust, noise, odour, etc.) can have detrimental effects for individual and public wellbeing. Likewise, locating activities that create significant nuisance effects (e.g., industrial activities) adjacent to existing established sensitive areas (e.g., residential or lifestyle areas) can have adverse effects. From Ngā Tai Ora’s perspective, it is important that appropriate strategic direction is provided to address this.
- **The Provision of Quality Open Space:** Ngā Tai Ora consider that the provision of quality open spaces to enable recreational, cultural, community and educational use. Well designed and located open space is crucial for the social and cultural wellbeing of people and communities and Ngā Tai Ora consider that strong strategic direction is needed to ensure this is required at the time of subdivision and development.
- **High Quality Safe Urban Environments:** The PDP is largely silent on the need to maintain high-quality and safe urban environments. This can be achieved by requiring the inclusion of Crime Prevention Through Environmental Design (CPTED) principles and traffic and pedestrian safety measures (e.g., slow streets, footpath width) for new subdivision and development. Ngā Tai Ora support a focus on high quality urban design, as such approaches promote public health outcomes at the time of subdivision and development, whilst also achieving greater connectivity for people and communities as an overall principle.

## 2.2 Consistency and Definitions

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It appears that the PDP has not been sufficiently reviewed for consistency across chapters and Ngā Tai Ora support a clear and well written plan, with consistently applied definitions and terminology. This in turn will



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support the efficient implementation of the Plan and ensure unintended development outcomes and incompatible land uses are avoided. Ngā Tai Ora have also made a number of specific submission points regarding definitions that will assist with plan interpretation and consistency of application.

## 2.3 Infrastructure

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The provision of infrastructure, in particular adequate and safe three waters infrastructure, is a key component of achieving positive public health outcomes for urban and rural environments. Ngā Tai Ora consider that sustainable and safe water supply, wastewater and stormwater systems (three waters systems) are essential for the health and wellbeing of the Far North population. Adequate provision of and access to three waters systems plays a major role in everyday lives in enhancing well-being of communities, impact on quality of life and overall health. Ngā Tai Ora specific submission points addresses this direction.

## 2.4 Transport

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Ngā Tai Ora support the provision of a safe, efficient and well-connected transport network. Connectivity is integral to the economic, social and cultural wellbeing of people and communities, and it is important that the District Plan provides clear and meaningful direction for the establishment of sustainable transportation networks for future subdivision and development.

Ngā Tai Ora note that the PDP is silent on the issue of the health impacts of unsealed rural roads. There are significant concerns regarding the effects that dust generated from unsealed rural roads can have on adjacent sensitive activities (e.g., residential units) that are not appropriately setback from the road. Effects include the adverse health effects such as respiratory illness (e.g., asthma) that dust generation can have for on-site water supply (e.g., rainwater harvesting).

Ngā Tai Ora have strongly advocated to other Councils in Te Tai Tokerau regarding this, and recommend that FNDC should consider including mandatory setbacks for sensitive activities from unsealed rural roads, or other methods that are not cost prohibitive for property owners but can address the significant adverse health effects associated with this issue. Ngā Tai Ora would welcome meeting with FNDC staff to discuss how this matter can be sufficiently addressed in the eventual PDP. **S516.003**



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## 2.5 Natural Hazards

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Ngā Tai Ora support the creation of resilient communities, responding to and managing risk from natural hazards to ensure the health, safety and wellbeing of Northland residents. Ngā Tai Ora is generally supportive of the objectives and policies of the Natural Hazards chapter to the extent that they give effect to the Northland Regional Policy Statement (RPS) and take into account the long-term effects of climate change. Specific submission points address other relevant matters and relief sought.

S516.004 &  
S516.005

## 2.6 Hazardous Substances

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Overall, Ngā Tai Ora is supportive of the decision from FNDC to include hazardous substances provisions in the PDP.

S516.006

Ngā Tai Ora's consider that the RMA has an important role to play in managing the location of land uses which store, use, transport and dispose of hazardous substances, identifying and assessing the risks and, where necessary, requiring these risks be avoided, remedied or mitigated to achieve the purpose of the RMA. Specific submission points address other relevant matters and relief sought.

## 2.7 Noise

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Ngā Tai Ora has engaged an independent Acoustician to provide an expert review of the Noise Chapter. The basis of his comments from the specific submission points in **Attachment 1** and relate to Ngā Tai Ora's desire to see that public health and safety is adequately protected from the adverse effects of noise.

## 3.0 Conclusion

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In conclusion, Ngā Tai Ora seeks the following relief:

- (a) Ngā Tai Ora's general comments in Section 2.0 are addressed through decisions on the PDP and the specific amendments sought in **Attachment 1** are made; and



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(b) Any further necessary consequential amendments required to achieve (a) above.

Ngā Tai Ora looks forward to working collaboratively with FNDC to address the above relief and is happy to meet with FNDC policy staff or consultants to work through these matters.

[TeWhatuOra.govt.nz](https://www.TewhatuOra.govt.nz)

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**Te Kāwanatanga o Aotearoa**  
New Zealand Government





# Attachment 1 -Ngā Tai Ora Specific Submission Points



Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
<b>Entire Plan</b>				
1	Entire Plan	Seek Amendment	Ngā Tai Ora notes that the PDP does not include any form of direction by way of mapping or provisions to set a clear hierarchy of centres. There is no identification of small, medium or large centres, or rural/coastal settlements versus large towns. Ngā Tai Ora consider this lack of strategic direction and centres hierarchy to be a significant flaw in the Plan that will hinder the ability to achieve a sustainable and compact urban form, which it supports.	Establish a centre hierarchy to set clear policy direction for the larger urban areas (e.g., Kerikeri, Kaikohe and Kaitaia) within the District, and amend provisions and zoning as necessary to implement the hierarchy that achieves a sustainable compact urban form.
<b>Part 1 – Introduction and General Provisions – How the Plan Works</b>				
2	How the Plan Works	Seek amendment	Ngā Tai Ora have identified that the overlay chapters are inconsistent with respect to referencing rules for “activities not otherwise listed.” The How the Plan Works chapter includes a statement that <u>some overlays</u> will automatically default to a permitted activity. Noting that resource consent may still be required under other Part 2: District-wide Matters chapters and/or Part 3: Area-Specific chapters (including the underlying zone).	Amend “Applications Subject to Multiple Provisions” as follows: “The overall activity status of a proposal will be determined on the basis <b><u>of all rules which apply to the proposal.</u></b> This includes rules in the District-Wide Matters and Area-Specific Matters. When a proposal involves several activities that are subject to multiple rules with different activity statuses, and/or involves an activity/activities across multiple zones, precincts, areas, overlays or features, and it is appropriate to "bundle" the activities, <b><u>the proposal will be assessed on</u></b>

S516.007

S516.008

Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			<p>This lack of consistency will cause confusion for plan users because:</p> <ol style="list-style-type: none"> <li>1. The overlay chapters do not include notes to this effect.</li> <li>2. Each overlay chapter has a different approach activity status default rules.</li> <li>3. Overlays and zone chapters use different terminology.</li> </ol> <p>Applying an automatic permitted activity default could lead to unintentional consequences, for example, the Coastal Environment is silent with respect to farm quarries, defaulting to a permitted activity under How the Plan Works. Rule RPROZ-R12 Farm Quarry provides for this activity as a permitted activity.</p>	<p><u>the basis of the most restrictive activity status</u> (unless otherwise stated). Where a rule for an overlay, zone or precinct controls an activity by reference to a proportion or percentage of the site, the control will be limited to that part of the site to which the overlay or zone applies. <del>Some of the Overlay chapters only include rules for certain types of activities (e.g. natural character, natural features and landscapes or coastal environment). If your proposed activity is within one of these overlays, but there are no overlay rules that are applicable to your activity, then your activity can be treated as a permitted activity under the Overlay Chapter unless stated otherwise. Resource consent may still be required under other Part 2: District wide Matters chapters and/or Part 3: Area-Specific chapters (including the underlying zone).</del></p> <p>...</p> <p>And amend all relevant overlay chapters as necessary to insert rules for “<b>Activities not otherwise listed in this chapter</b>” consistent with zone chapters.</p>
3	How the Plan Works	Seek amendment	Each PDP chapter includes implementation advice notes. Many of these notes apply across chapters e.g. Infrastructure chapter note 5, limits the infrastructure provisions to network utility operators only.	Review all implementation advice notes across the plan to ensure consistency, and list notes which apply across multiple chapters in the How the Plan Works chapter.

S516.009  
S516.082 to  
S516.084

S516.010

Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			This note is easily missed and could lead to plan interpretation issues.	
<b>Part 1 – Introduction and General Provisions – Interpretation - Definitions</b>				
4	Definitions	Seek amendment	<p>While the PDP includes activity-based rules which manage the establishment and operation of activities within zones and sites, the rules include activities that do not have definitions and there are various discrepancies between the activities and terms utilised within the zone and resource overlay chapters.</p> <p>Examples of where this occurs includes:</p> <ul style="list-style-type: none"> <li>• The definition of <i>Healthcare activity</i> specifically excludes “hospitals”, of which is not defined but excluded from the definition of Healthcare activity.</li> <li>• The definitions of <i>Large Format Retail</i>, and <i>Rural Produce Retail</i> all refer to “retail activities” however there is no definition of retail within the Plan.</li> </ul>	<p>Review all definitions, amend overlaps, and/or create definitions for terms which are not currently defined. <b>S516.011</b></p> <p>Review and amend rules as necessary to refer only to defined terms used in activity-based rules. <b>S516.012</b></p> <p>Introduce nesting tables to clearly group activities into categories. <b>S516.013</b></p>
5	Definitions	Seek amendment	<p>Ngā Tai Ora seek to ensure that “healthcare facilities” and “hospitals” are appropriately enabled within the PDP to provide for the health and wellbeing of the Far North community. The definition of “Healthcare activity” specifically excludes “hospitals”, of which is not defined, as such it is unclear</p>	<p>Amend the definitions chapter to insert the following definition for Hospital: <b>S516.014</b></p> <p><b><u>“Hospital means any regionally significant infrastructure that provides for the medical, surgical or psychiatric care, treatment and rehabilitation of persons.”</u></b></p>

Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			whether or not the PDP provides for “hospitals”.	
6	Definitions	Seek amendment	Ngā Tai Ora seek to ensure that "commercial activities related to food and beverage activities follow food hygiene regulations (preparation and storage). It is important that food and beverage activities are separately defined.	Amend the definitions chapter to insert the following definition: <u>“Food and Beverage Activity means activities where the primary business is selling food or beverages.</u> <u>Includes:</u> <u>a. restaurants and cafes;</u> <u>b. food halls; and</u> <u>c. takeaway food bars and bakeries.</u> <u>Excludes:</u> <u>a. retail shops; and</u> <u>b. grocery stores.”</u>
7	Definitions	Seek amendment	The PDP introduces definitions for “infrastructure” and “development infrastructure” there is no link or cross reference between the two definitions. Provisions throughout the PDP interchange and use the two terms resulting in inconsistency and confusion within the plan.  Furthermore, infrastructure should be considered more holistically to include the natural environment such as trees and waterbodies.	Review all references to “infrastructure” and “development infrastructure” and amend to avoid duplication and ensure consistency.  FNDC widen their consideration of infrastructure to include natural solutions.
<b>Part 2 – District Wide Matters – Strategic Direction – Economic and Social Wellbeing</b>				
8	Strategic Direction – SD-UFD-O2	Support	Ngā Tai Ora endorses enabling urban consolidation and intensification of existing	Retain SD-UFD-O2 as drafted.

S516.015

S516.016 &  
S516.017

S516.018

S516.019

Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			centres / settlements while avoiding sprawling into productive rural areas. A compact urban form results in efficiencies in the provision of public transport and community cohesion, and ultimately is beneficial in terms of achieving positive public health outcomes.	
9	Strategic Direction – SD-UFD-O3	Seek amendment	The provision of adequate three waters infrastructure and the provision of electricity and telecommunications infrastructure is a key component of achieving positive public health outcomes for both urban and rural environments. It is important that the provision of this infrastructure is required at a strategic level to ensure that it is properly co-ordinated in future subdivision and development within the District.	Amend SD-UFD-O3 as follows:  <b><u>“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.”</u></b>
10	Strategic Direction – SD-UFD-O4	Seek amendment	Natural hazards have significant implications for public health. Climate change is a significant challenge facing the world, and the PDP needs to have clear strategic direction about how the risk and implications of climate change and other natural hazards are going to be managed in future subdivision and development.  The PDP must acknowledge and minimise the risks and impacts of natural hazards, including the influence of climate change, on	Insert the following objective: <b><u>“Minimise the risks, impacts and costs of natural hazard events on people, communities and the natural and built environment in Far North District.”</u></b>  Amend SD-UFD-O4 as follows: “Urban growth and development is resilient, and adaptive to <del>and</del> pre-empt the impacts from natural hazards <del>or</del> <b><u>and</u></b> climate change.”

S516.020

S516.021

S516.022

Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			<p>people, property and infrastructure, consistent with objective 3.13 Natural hazard risk of the Northland Regional Policy Statement.</p> <p>SD-UFD-04 is inconsistent with proposed NH-O1 and NH-O2 which seek to manage/minimise risk from natural hazards rather than adapt to natural hazards.</p>	
11	Strategic Direction – New Provisions	Seek amendment	<p>Section 5(1) of the RMA 1991 states that the purpose of the Act “is to promote the sustainable management of natural and physical resources.” and section 5 (2) defines sustainable management which includes enabling people to provide for their health and safety.</p> <p>The Strategic direction objectives do not explicitly mention sustainable development and community health and safety.</p> <p>Ngā Tai Ora consider that sustainable development is a blueprint to promote, improve and protect community well-being by addressing the interconnected social, environment, and economic causes. The Strategic Direction chapters sets out the overarching direction for the District Plan, as such the objectives should refer to sustainable development and community health and safety.</p>	Review and amend all Strategic Direction objectives as necessary to refer sustainable development and community health and safety.

S516.023

Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
12	Strategic Direction – New Provisions	Seek amendment	The Strategic Direction chapters do not contain policy which give effect to proposed objectives. Ngā Tai Ora consider that there is no clear policy direction to give effect to the proposed objective which could lead to an ineffective plan.	Insert appropriate policy in to the Strategic Direction chapters to give effect to strategic direction objectives.
13	Strategic Direction – New Provisions	Seek amendment	The Strategic Direction chapters do not contain objectives and policy which give effect to objective 3.7 Regionally Significant Infrastructure of the Northland Regional Policy Statement. Ngā Tai Ora support recognition and promotion of the benefits of regionally significant infrastructure throughout the Far North District, particularly the importance of public hospitals.	Insert objectives and policies in the Strategic Direction chapters as follows: <u>“Objective: The benefits of Regionally Significant Infrastructure are recognised and provided for.</u>  <u>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.”</u>
14	Strategic Direction – New Provisions	Seek amendment	Ngā Tai Ora consider that the District Plan should encourage and facilitate a transition to greater provision of public and active modes of transport. This is crucial for maintaining and enhancing the accessibility and safety for people and communities. It is also important that strategic direction is provided regarding integrating land use and transport planning to achieve greater connectivity for people and communities as an overall principle.	Amend Strategic Direction and insert the following objective:  <u>“Maintain and enhance accessibility and safety for communities and integrate land use and transport planning.”</u>

S516.024

S516.025

S516.026

Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought	
15	Strategic Direction – New Provisions	Seek amendment	Ngā Tai Ora consider that reverse sensitivity is a significant resource management issue with regards to public health and wellbeing. Locating sensitive activities (e.g., residential activities) adjacent to activities that create adverse nuisance effects (e.g., dust, noise, odour, spray drift etc.) can have detrimental effects for individual and public wellbeing. Likewise, locating activities that create significant nuisance effects (e.g., industrial activities) adjacent to existing established sensitive areas (e.g., residential or lifestyle areas) can have adverse effects. From Ngā Tai Ora’s perspective, it is important that appropriate strategic direction is provided to address this.	Amend Strategic Direction and insert the following objective: <b><u>“Avoid reverse sensitivity effects between incompatible activities and zones.”</u></b>	S516.027
16	Strategic Direction – New Provisions	Seek amendment	Ngā Tai Ora consider that the provision of quality open spaces to enable recreational, cultural, community and educational use. Well designed and located open space is crucial for the social and cultural wellbeing of people and communities and Ngā Tai Ora consider that strong strategic direction is needed to ensure this is required at the time of subdivision and development.	Amend Strategic Direction and insert the following objective: <b><u>“A range of quality open space for the social and cultural well-being of a growing population.”</u></b>	S516.028
17	Strategic Direction – New Provisions	Seek Amendment	The PDP is largely silent on the need to maintain high-quality and safe urban environments.	Amend Strategic Direction and insert the following objective and policy: New objective:	S516.029



Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			<p>This can be achieved by requiring the inclusion of Crime Prevention Through Environmental Design (CPTED) principles and traffic and pedestrian safety measures (e.g., slow streets, footpath width) for new subdivision and development.</p> <p>Ngā Tai Ora support a focus on high quality urban design, as such approaches promote public health outcomes, such as the provision of shade reducing heat and UV at the time of subdivision and development, whilst also achieving greater connectivity for people and communities as an overall principle.</p>	<p><u>“Ensure high quality urban design that responds positively to the local context and creates and maintains safe urban environments in the Far North District.”</u> New policy:</p> <p><u>“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.”</u></p> <p>Include associated rules and information requirements (e.g., requirements for urban design assessments) as required in the zone chapters to give effect to this objective and policy.</p>

Energy, Infrastructure and Transport - Infrastructure

18	Infrastructure Chapter	Seek amendment	<p>FNDC has determined that the proposed Infrastructure chapter does not apply to provision of private infrastructure (three waters infrastructure). This has led to very little policy direction with respect to the provision of three waters infrastructure.</p> <p>Ngā Tai Ora consider that sustainable and safe water supply, wastewater and stormwater systems (three waters systems) are essential for the health and wellbeing of the Far North population. Adequate provision of and access to three waters</p>	<p>Amend the PDP to establish a separate Three Waters Chapter OR alternatively include policy direction and provisions within the proposed Infrastructure Chapter which manage and ensure the sustainable and safe, provision of water supply, wastewater and stormwater systems within the Far North District.</p>
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S516.030

Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			<p>systems plays a major role in everyday lives in enhancing well-being of communities, impact on quality of life and overall health.</p>	
19	Three Waters Provisions	Seek amendment	<p>Ngā Tai Ora note that where there are three waters provisions in the PDP, they are scattered throughout the chapters and are inconsistent. This will result in inconsistent provision and maintenance of three waters infrastructure. Some examples of inconsistency are provided below:</p> <p><i>I-05 The provision of <u>infrastructure</u> is integrated with <u>land-use</u> and is coordinated at the time of <u>subdivision</u> and development.</i></p> <p><i>SUB-03 Infrastructure is planned to service the proposed subdivision and development where:</i></p> <p><i>a. there is existing infrastructure connection, infrastructure should provided in an integrated, efficient, coordinated and future-proofed manner at the time of subdivision; and</i></p> <p><i>b. where no existing connection is available infrastructure should be planned and consideration be given to connections with the wider infrastructure network.</i></p>	<p>Review all infrastructure provisions throughout the plan to ensure provisions achieve consistent management of infrastructure, particularly three waters.</p>

S516.031

Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			<p>GRZ-P6 Encourage and support the use of on-site <u>water</u> storage to enable sustainable and efficient use of <u>water</u> resources.</p> <p>RSZ-P2 Require land use and <u>subdivision</u> in the Settlement zone associated with non-residential activities to demonstrate the ability to provide for onsite <u>infrastructure</u> unless a reticulated service is available.</p>	
20	Infrastructure Chapter – I-O1	Seek amendment	<p>Ngā Tai Ora support the provision of sustainable and safe water supply, wastewater and stormwater systems (three waters systems) are essential for the health and wellbeing of the Far North population. Adequate provision of and access to three waters systems plays a major role in everyday lives in enhancing well-being of communities, impact on quality of life and overall health.</p>	<p>Amend I-O1 as follows:            “The District has <b>sustainable</b>, safe, efficient and resilient infrastructure that services the current and future needs of people and communities in the district.”</p>
21	Infrastructure Chapter – I-R17	Seek amendment	<p>Ngā Tai Ora consider that this proposed rule will result in unnecessary cost and delay to the provision of public infrastructure, triggering all above ground three waters infrastructure to require resource consent as a restricted discretionary activity.</p>	<p>Amend I-R17 to provide for above ground three waters infrastructure as a permitted activity, outside of sensitive locations such as Outstanding Natural Landscapes, Outstanding Natural Features etc.</p>
22	Infrastructure Chapter	Seek amendment	<p>The Council’s Environmental Engineering Standards are referenced throughout the</p>	<p>Review and refine the relationship of the District Plan to the Environmental Engineering Standards to:</p>

S516.032

S516.033

S516.034

Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			<p>subdivision provisions, setting minimum standards to the establishment of three waters infrastructure at time of subdivision. However, the Environmental Engineering Standards are not included within the Infrastructure Chapter as a compliance standard.</p> <p>Ngā Tai Ora are concerned that this is inconsistent application of engineering standards. Furthermore, the referenced Environmental Engineering Standards do not ensure sustainable, safe and efficient provision of three waters infrastructure.</p> <p>Ngā Tai Ora support green infrastructure, especially around the control of stormwater to retain water, adequately maintain or improve water quality (drinking recreational water source,) as well as maintaining shade plants from drought conditions while not creating habitat for vectors.</p>	<ul style="list-style-type: none"> <li>(a) Ensure the District Plan requires the delivery of infrastructure in a manner that achieves sustainable, safe and efficient provision of infrastructure.</li> <li>(b) Ensure referencing of the Environmental Engineering Standards in the District Plan is appropriate and results in clear and measurable rules.</li> <li>(c) Cross-referencing to Environmental Engineering Standards is consistent across all chapters.</li> <li>(d) Ensure the District Plan provides for and enables green infrastructure, including for the control of stormwater.</li> </ul>

Energy, Infrastructure and Transport – Transport

23	Transport Chapter – TRAN-P5	Seek amendment	<p>Ngā Tai Ora consider that the objectives and policies need to be stronger and more directive regarding the use of active and public transportation methods, which are beneficial to not just public health outcomes, but general environmental outcomes (e.g., reduced greenhouse gas admissions).</p>	<p>Amend TRAN-P5 as follows:</p> <p><b>“Encourage subdivision and development achieve new land uses to support an</b> integrated and diverse transport network by:</p> <ul style="list-style-type: none"> <li>(a) <b>Promoting providing multi-modal forms of transport that provides for the needs of all users, as</b></li> </ul>
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Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			<p>Ngā Tai Ora acknowledge TRAN-P5 includes provision for alternative transport modes but weak language such as “encourage” and “promote” is used and there is no clear overall objective to directly require an increase in the provision of, and use of alternative transport modes. On this basis, Ngā Tai Ora consider that current objectives and policies will ultimately result in the continuation of a car centric transportation network in the Far North. Greater direction is needed within this chapter to help increase the role that alternative modes of transport play in the future of the Far North.</p>	<p>appropriate for the surrounding environment and the function of the road within the transport network hierarchy;</p> <p>...”</p>
24	Entire Plan/Transport Chapter	Seek amendment	<p>Ngā Tai Ora note that the PDP is silent on the issue of the health impacts of unsealed rural roads. There are significant concerns regarding the effects that dust generated from unsealed rural roads can have on adjacent sensitive activities (e.g., residential units) that are not appropriately setback from the road. Effects include the adverse health effects such as respiratory illness (e.g., asthma) that dust generation can have for on-site water supply (e.g., rainwater harvesting).</p> <p>Ngā Tai Ora have strongly advocated to other Councils in Te Tai Tokerau regarding this, and recommend that FNDC should consider</p>	<p><b><u>Seek amendment to insert the following policies and rules into either the Transport Chapter or relevant zone chapters:</u></b></p> <p><b><u>“Objective:</u></b>  <b><u>Manage the risk from unsealed roads to public health.</u></b></p> <p><b><u>Policy:</u></b>  <b><u>To ensure sensitive activities are appropriately setback from unsealed roads to reduce the adverse effects to public health from the exposure to dust.</u></b></p> <p><b><u>Rule</u></b>  <b><u>XXX Sensitive Activity:</u></b>  <b><u>Activity Status: Permitted</u></b></p> <p><b><u>Where:</u></b></p>

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Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			<p>including mandatory setbacks for sensitive activities from unsealed rural roads, or other methods that are not cost prohibitive for property owners but can address the significant adverse health effects associated with this issue. Ngā Tai Ora would welcome meeting with FNDC staff to discuss how this matter can be sufficiently addressed in the eventual PDP.</p>	<p><u>PER-1 The sensitive activity is setback at least 20m from any unsealed road. Activity status where compliance is not achieved: Discretionary.”</u></p>
25	Transport – Rule TRAN-R4	Seek amendment	<p>Ngā Tai Ora generally support Rule TRAN-R4 (Electric Vehicle Charging Stations) which provides a permitted activity status for electric vehicle charging stations. The usage of electric vehicles is increasing and providing for them is prudent in the Far North District Plan.</p> <p>However, this also needs to be furthered by providing for safe and secure electric bicycle and electric scooter (disability) charging stations. The usage of electric bicycles is increasing by both elderly and leisure bicycle users in the Far North District. Providing charging stations would encourage more people being active in Far North communities.</p>	<p>Amend rule TRAN-R4 to include the requirement to provide safe and secure electric bicycle and electric scooter charging stations.</p>
26	Transport – TRAN-S1 and TRAN-Table 1	Support	<p>Ngā Tai Ora support the requirements for bicycle and accessible car parking spaces in TRAN-S1, and the subsequent spaces</p>	<p>Retain as notified.</p>

S516.039

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S516.041

Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			specified in TRAN-Table 1. It is important that minimum requirements on bicycle and accessible parking spaces are established to encourage active modes of transport and accessibility for the disabled and elderly.	
27	Transport – Engineering Standards	Seek amendment	The Council’s Environmental Engineering Standards are referenced throughout the transport chapter setting minimum standards for the establishment of roads. Ngā Tai Ora are concerned that this is inconsistent application of engineering standards. Furthermore, the referenced Environmental Engineering Standards do not ensure sustainable, safe and efficient provision of roading infrastructure.	Review and refine the relationship of the District Plan to the Environmental Engineering Standards to: <ul style="list-style-type: none"> <li>(a) Ensure the District Plan requires the delivery of infrastructure in a manner that achieves sustainable, safe and efficient provision of infrastructure.</li> <li>(b) Ensure referencing of the Environmental Engineering Standards in the District Plan is appropriate and results in clear and measurable rules.</li> <li>(c) Cross-referencing to Environmental Engineering Standards is consistent across all chapters.</li> </ul>
<b>Part 2 – District Wide Matters – Natural Hazards</b>				
28	Natural Hazards – Whole Chapter	Seek amendment	Ngā Tai Ora support the creation of resilient communities, responding to and managing risk from natural hazards to ensure the health, safety and wellbeing of Northland residents. Ngā Tai Ora is generally supportive of the Natural Hazards chapter to the extent that they give effect to the Northland Regional Policy Statement and take into	Amend Natural Hazards objectives, policies and rules to appropriately give effect to the Northland Regional Policy Statement which seeks to <b>manage</b> subdivision, use and development to <b>minimise</b> the risk from natural hazards.

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S516.045

Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			<p>account the long-term effects of climate change, including the influence of climate change on people.</p> <p>The PDP must acknowledge and minimise the risks and impacts of natural hazards, including the influence of climate change, on people, property and infrastructure, consistent with objective 3.13 Natural hazard risk of the Northland Regional Policy Statement.</p>	
29	Natural Hazards – NH-P8 and rules	Seek Amendment	Ngā Tai Ora support the creation of resilient communities, responding to and managing risk from natural hazards to ensure the health, safety and wellbeing of Northland residents. Policy NH-P8 seeks to avoid the use of land that is susceptible to land instability, without any rule to give effect to this policy. Ngā Tai Ora consider this to be a significant gap in the Natural Hazards chapter and could lead to risk to people and property.	Amend the Natural Hazards chapter to include appropriate rules to give effect to NH-P8.
30	Natural Hazards – NH-R7, NH-R8 and NH-R12	Support	Ngā Tai Ora support the concept of managing vulnerable activities within hazard areas.	Retain as notified.

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S516.049



Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
31	Hazardous Substances – Overall Approach	Support, seek amendment	<p>Overall, Ngā Tai Ora is supportive of the decision from FNDC to include hazardous substances provisions in the PDP.</p> <p>Ngā Tai Ora consider that the RMA has an important role to play in managing the location of land uses which store, use, transport and dispose of hazardous substances, identifying and assessing the risks and, where necessary, requiring these risks be avoided, remedied or mitigated to achieve the purpose of the RMA.</p>	<p>Include appropriate rules for the management storage, use, transport and disposal of hazardous substances in the Far North District. At a minimum, this should include (but is not limited to) the inclusion of rules managing:</p> <ul style="list-style-type: none"> <li>• The establishment or expansion of facilities managing, storing, using or disposing of hazardous substances within, or in close proximity to, sensitive environments (e.g., residential areas or adjacent to schools or health care facilities and hospitals).</li> <li>• The establishment of sensitive activities (e.g., residential activities, marae schools or healthcare facilities and hospitals) adjacent to, or within close proximity to, lawfully established hazardous substances facilities.</li> <li>• The establishment or expansion of facilities managing, storing, using or disposing hazardous substances in areas that may increase the risk of accident or adverse effects on public health and safety, and the environment (e.g., in areas subject to natural hazards or adjacent to sensitive natural environments or habitats).</li> <li>• Appropriate limits or thresholds for the storage of certain hazardous</li> </ul>

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Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
				substances across the various zones in the PDP.
32	Hazardous Substances – HS-R2	Seek amendment	Ngā Tai Ora support the concept of separating Significant Hazardous Facilities from sensitive activities and sensitive environments. However, the section 32 evaluation report does not provide any justification or technical evidence to support the proposed minimum setback of 250m.	That Council undertake a technical assessment of the Hazardous Substances provisions to confirm that the proposed 250m separation is sufficient, to manage the risk to public health and safety and the environment. That Council complete a section 32AA evaluation of the rules to determine what is the most efficient and effective separation distance to give effect to the objectives and policies. That Council update the provisions based upon the findings of technical assessment and section 32AA evaluation.
33	Hazardous Substances – HS-R11	Support	Ngā Tai Ora support the buffering and separation of Significant Hazardous Facilities from sensitive activities and environments.	Retain as notified.
34	Hazardous Substances – HS-R7 and R8	Support	Ngā Tai Ora support the non-complying activity status for proposed rules HS-R7 and R8. Locations subject to natural hazards, which can increase the likelihood of a release of a hazardous substance into the environment should a natural hazard event occur.	Retain as notified.
Part 2 – District Wide Matters – Subdivision				
35	Subdivision – SUB-R8	Seek amendment	Ngā Tai Ora support the creation of resilient communities, responding to and managing	That Council undertake further mapping of land instability to understand the potential risk of land instability throughout the

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S516.056

Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			<p>risk from natural hazards to ensure the health, safety and wellbeing of Northland residents.</p> <p>Ngā Tai Ora consider that UB-R8 is ineffective and inefficient. The rule requires building platforms, access and services to be located wholly outside of any area on site which is identified as land susceptible to land instability. Land susceptible to land instability is not mapped in the PDP, instead the PDP provides a complicated definition which requires applicants to undertake individual mapping of their own site.</p> <p>Ngā Tai Ora, consider that this method is onerous, placing considerable cost on landowners particularly when provisions of affordable, safe and healthy housing is essential in the Far North District.</p>	<p>District, and introduce rules which apply to the appropriately identified areas of risk.</p> <p>Or alternatively:</p> <p>Review the definition of land identified as susceptible to land instability, to be easily understandable and identifiable. Amend rule SUB-R8 to locate building platforms, access and services in the least as risk portion of the parent site.</p>
36	Subdivision – SUB-R11 and SUB-R12	Seek amendment	<p>As proposed, rules SUB-R11 and SUB-R12 are inefficient and ineffective. Coastal and flood hazard areas are mapped overlays, rules and constraints apply to the mapped location. These rules will result in any subdivision of any site containing a portion of identified coastal hazard as a restricted discretionary activity no matter what the potential risk is.</p> <p>Ngā Tai Ora, consider that this method is onerous, placing considerable cost on</p>	<p>Amend SUB-R12 to be a permitted activity where building platforms and associated access for each allotment is located wholly outside the spatial extent of the Coastal Hazard Area.</p>

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Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			landowners particularly when provisions of affordable, safe and healthy housing is essential in the Far North District.	
37	Subdivision – SUB-S4 and SUB-S5	Seek amendment	SUB-S4 and SUB-S5 requires all stormwater management and wastewater disposal to be in accordance with the Far North District Council Environmental Engineering Standards. Ngā Tai Ora are concerned that these Engineering Standards do not ensure sustainable, safe and efficient management of stormwater and wastewater disposal. As a catch all standards these reference the entire Engineering Standards, resulting in potential unclear and unmeasurable rules.	Review and refine the relationship of the District Plan to the Environmental Engineering Standards to: <ul style="list-style-type: none"> <li>(a) Ensure the District Plan requires the delivery of infrastructure in a manner that achieves sustainable, safe and efficient provision of infrastructure.</li> <li>(b) Ensure referencing of the Environmental Engineering Standards in the District Plan is appropriate and results in clear and measurable rules.</li> <li>(c) Cross-referencing to Environmental Engineering Standards is consistent across all chapters.</li> </ul>
Part 2 – District Wide Matters – General District Wide Matters – Coastal Environment				
38	CE-R12 and CE-R14	Support	Ngā Tai Ora support the concept of managing vulnerable activities within hazard areas.	Retain as notified.
39	CE-R17 and CE-R18	Seek amendment	These provisions duplicate HS-R8, Ngā Tai Ora support the activity status of HS-R8.	Delete CE-R17 and CE-R18.
Part 2 – District Wide Matters – General District Wide Matters – Noise				

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Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
40	NOISE-Objectives	Seek amendment	<p>Objectives NOISE-O1 and NOISE-O2 are currently both framed as relating to activities generating noise.</p> <p>Based on evidence from the World Health Organisation, existing environmental noise causes significant harm to the health of communities. This public health matter warrants action as an important resource management issue to be addressed in the Noise chapter, and not just as a corollary to polluting activities.</p>	<p>Add a new objective:  <u>“NOISE-O3 The health and wellbeing of people and communities are protected from significant levels of noise.”</u></p>
41	NOISE-P1	Seek amendment	<p>To protect public health it is essential to control types of activities and noise levels. However, in this proposed policy these actions are only listed in terms of upholding character and amenity, which are secondary issues to the protection of health.</p>	<p>Amend NOISE-P1 as follows:  <u>“Protect public health and</u> uphold the character and amenity of each zone by controlling the types of activities and noise levels that are permitted in each zone.”</p>
42	NOISE-Rules (introductory/ header text)	Oppose, seek amendment	<p>Noise limits associated with plantation forestry are set in the National Environmental Standards for Plantation Forestry (this appears to have been omitted from consideration in 3.2.3 of the s32 report). If reference is made to forestry, it should be clarified that noise limits do apply.</p>	<p>Amend introductory text as follows:  “...  5. agriculture, horticulture and pastoral farming activities undertaken for a limited duration, including using agricultural vehicles, machinery or equipment used on a seasonal or intermittent basis, <del>forestry planting and forestry harvesting</del> in the Rural Production, Horticulture and Horticulture Processing zones;  “...”</p>

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Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
43	NOISE-R6	Support, seek amendment	<p>The three permitted activity conditions should all apply in conjunction and not as alternatives.</p> <p>In accordance with the Noise and Vibration Metrics National Planning Standard and in turn NZS 6801, the peak sound levels should be expressed in “dB<sub>LCpeak</sub>”</p>	<p>Amend NOISE-R6 as follows:  “Where:  PER-1  1. At least 5 working days prior to the commencement of the activity, notify the Council of the activity, including details of the nature, duration and scale of activity, and any consultation that has been undertaken; <b>and</b>  <b>PER-2</b>  <b>2.</b> The activity complies with the following:  i. <b>1.</b> occurs between the hours of 7.00am to 7.00pm, and achieves either a 500m minimum separation distance to, or peak sound pressure level of 95 dBC LCpeak when measured within the notional boundary of any noise sensitive activity; and/or  ii. <b>2.</b> occurs between 7.00pm to 7.00am, and achieves either a 1250m minimum separation distance to, or peak sound pressure level of 85 dBC LCpeak when measured within the notional boundary of any noise sensitive activity; and  <b>PER-3</b>  <b>3.</b> The activity complies with standard: NOISE-S6 Explosives.”</p>
44	NOISE-R7	Oppose, seek amendment	<p>The drafting of the rule is not clear. There is a list under “This standard does not apply to:...” which might have been with the intention of making the listed activities permitted, but actually is excluding them from being permitted. Regardless, these</p>	<p>Delete text in NOISE-R7 as follows:  “<del>This standard does not apply to:</del>  i. <del>Emergency or rescue helicopter operation occurring to or from Bay of Islands, Rawene or Kaitia Hospital (excludes established helicopter bases on hospital land).</del>”</p>

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Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			activities have adverse effects on public health so should have controls. To avoid ambiguity the activities should be deleted.	<p><del>ii-Emergency or rescue helicopter landings, departures, overflights or activity during operations that occur away from the permanently established helicopter base.</del></p> <p><del>iii-Cropping, top dressing, and spraying for the purpose of farming or conservation carried out in the Rural Production, Horticulture zones, or within Significant Natural Area on a seasonal, temporary, or intermittent basis for a period up to 30 days in any 12 month period."</del></p>
45	NOISE-R8	Support, seek amendment	<p>The three permitted activity conditions should all apply in conjunction and not as alternatives.</p> <p>The term "maximum noise level frequency" is erroneous and could lead to incorrect interpretation.</p>	<p>Amend NOISE-R8 as follows:</p> <p>"PER-1</p> <p>1. ...; <del>and</del></p> <p><del>PER-2</del></p> <p>2. ...</p> <p>ii. <b>A maximum noise level frequency of Sound levels not exceeding</b> 65 dB LAE within the notional boundary of any noise sensitive activity not owned by the operator of the device; <del>and</del></p> <p><del>PER-3</del></p> <p>3. ..."</p>
46	NOISE-R9	Support, seek amendment	<p>The three permitted activity conditions should all apply in conjunction and not as alternatives.</p> <p>The term "maximum noise" should be avoided as maximum noise level is a specific acoustics metric.</p>	<p>Amend NOISE-R8 as follows:</p> <p>"PER-1</p> <p><b>1. ...; and</b></p> <p><del>PER-2</del></p> <p><b>2. ...; and</b></p> <p><del>PER-3</del>"</p> <p>3. The <del>maximum</del> noise generated by a single or multiple frost fans shall not exceed 55 dB LAeq(15min) at any time when assessed</p>

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Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			The note regarding special audible characteristics could be misinterpreted and should be rephrased and included in the main clause.	within the notional boundary of any noise sensitive activity on another site, with no adjustment applied for any special audible characteristics. <b>Note: The noise limit includes a correction for the special audible characteristics of frost fans.</b>
47	NOISE-S1 (heading/title)	Oppose, seek amendment	The term “maximum noise levels” has a defined meaning in acoustics standards relating to one specific noise metric. An alternative term should be used for referring to noise limits in general.	Amend the title of NOISE-S1 (and all references to it in other provisions) to read: <b>“<del>Maximum noise levels</del> Noise limits – zone specific”</b>
48	NOISE-S1	Oppose, seek amendment	The s32 appendix report recommended a comprehensive set of zone noise limits including limits within zones and between zones. It recommended an overarching provision that, unless otherwise specified, emissions from any zone have to comply with the “within zone” noise limits for the receiving zone. In the notified proposed plan, those recommendations from the s32 report appendix have not been implemented. It appears an attempt has been made to simplify and combine the “within” and “between” zone noise limits, but in this process it has created numerous gaps where noise emissions between zones are not controlled. As such, the notified provisions are inadequate to protect public health. With	Replace NOISE-S1 with a table containing noise limits for each zone, applying to noise received in sites in each zone, regardless of whether the noise originated from other sites in that zone or sites in another zone. Only set airport noise limits at one boundary (outer control or air noise) for each airport. If separate noise limits are maintained for aircraft engine testing, amend the metric to read: “...dB L <sub>Aeq(15 min)</sub> <del>(9 hour)</del> ...”

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Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			<p>the current structure of NOISE-S1 there is not a simple remedy and therefore specific wording has not been proposed here as comprehensive redrafting is required to address this issue.</p> <p>For airport noise, inclusion of both outer control boundaries and air noise boundaries is often appropriate for land use planning purposes. However, as a “noise limit”, only one control line should apply to each airport. By default, this should be the air noise boundary, unless for a small airport this line does not extend far enough to be practical.</p> <p>In accordance with the Noise and Vibration Metrics National Planning Standard and in turn NZS 6802, engine testing noise (that is not otherwise included in aircraft operations noise), should be subject to noise limits using the metric <math>L_{Aeq(15 \text{ min})}</math> and not with a 9 hour average.</p>	
49	NOISE-S2	Support, seek amendment	There is a typographical error for two noise metrics.	Amend two instances to read: “... <b>dB</b> $L_{Aeq(1 \text{ min})}$ ...”
50	NOISE-S4	Support, seek amendment	The text explicitly refers to “the following noise limits” but none are given.	Amend to add noise limits from Table 1 of NZS 6807.
51	NOISE-S5	Support, seek amendment	For all parts of this provision, if residents need to close windows to maintain reasonable indoor noise levels then	<b><u>Replace existing ventilation requirements in all three rows with the following:</u></b>

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Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			adequate alternative ventilation and cooling need to be provided. Clause G4 of the New Zealand Building Code only requires minimal ventilation and no cooling.	<p><u>If windows are required to be closed to achieve the internal noise limit the building must be designed, constructed and maintained with a mechanical ventilation system that for habitable rooms:</u></p> <p><u>i. provides mechanical ventilation to satisfy clause G4 of the New Zealand Building Code; and</u></p> <p><u>ii. is adjustable by the occupant to control the ventilation rate in increments up to a high air flow setting that provides at least 6 air changes per hour; and</u></p> <p><u>iii. provides relief for equivalent volumes of spill air; and</u></p> <p><u>iv. provides cooling and heating that is controllable by the occupant and can maintain the inside temperature between 18°C and 25°C; and</u></p> <p><u>v. does not generate more than 35 dB LAeq(30s) when measured 1m away from any grille or diffuser.</u></p>
52	NOISE-Table 1	Oppose, seek amendment	There are no design noise levels specified for the Orongo Bay zone, as required by NOISE-S5.	Add design noise levels for the Orongo Bay zone to the table.
53	NOISE-Table 2	Support, seek amendment	<p>There are two typographical errors in the vibration limits. All limits should be with units of mm/s.</p> <p>The number of blasts per year is erroneously stated as “all hours” and value of peak</p>	<p>Amend two instances so that all vibration limits are in units of mm/s</p> <p>Amend the number of blasts and peak airblast sound limit to delete and replace entries of “all hours” and “all” respectively.</p>

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Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			airblast sound limit is stated as "all" in two rows.	

Part 3 – Area Specific Matters - Zones

54	Zones	Seek amendment	<p>The PDP utilises a Mixed Use Zone (MUZ) for all existing urban centres, with no alternative commercial zones proposed. The National Planning Standards provide a range of commercial zones:</p> <p>Neighbourhood Centre Zone</p> <p>Local Centre Zone</p> <p>Commercial Zone</p> <p>Large Format Retail Zone</p> <p>Mixed Use Zone</p> <p>Town Centre Zone</p> <p>Metropolitan Centre Zone</p> <p>City Centre Zone.</p> <p>In the absence of a section 32 evaluation, Ngā Tai Ora are unable to understand why Council has chosen to only use one commercial zone being the MUZ.</p>	<p>That Council provide clear strategic direction for a compact urban form and establish a centres hierarchy within the Plan. Reconsider the approach to commercial zones and reconsider the most appropriate zoning for existing centres and villages which accurately reflects existing and planned levels of development specific to those areas.</p> <p>Provide sufficient section 32 evaluation to support the approach to zoning.</p>
55	Zones	Seek amendment	<p>Ngā Tai Ora also acknowledge and support the zoning pattern surrounding Kerikeri recommending that this pattern should apply throughout the District, which utilises zoning buffers (Rural Residential and Rural Lifestyle,</p>	<p>Review the zoning pattern of larger centres such as Kawakawa, Kaikohe, Omapere, Rawene, and Kaitaia, with further consideration given to managing adverse</p>

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Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			<p>or other zones that don't provide for such intensive forms of residential development) between the Horticultural and Rural Production Zones and the General Residential Zone. This zoning pattern provides separation between the higher density residential activities and the more intensive land uses anticipated within the Rural Production and Horticultural zones which will in turn assist in minimising the extent of adverse effects on people's health and safety, and also minimising reverse sensitivity effects. Mineral Extraction Overlays also appear to be well separated from residential zoned land.</p> <p>The Kawakawa, Kaikohe, Omapere, Rawene, and Kaitaia settlements however don't appear to have the same level of protection.</p>	<p>effects at the zone interface throughout the District.</p> <p>Review zone provisions to ensure adverse effects between zones at zone interface is managed by way of increased setbacks and/or noise and vibration considerations.</p>
56	Zones	Seek amendment	<p>Ngā Tai Ora, consider that it is important to ensure provision of sustainable and safe water supply, wastewater and stormwater systems (three waters systems), which are essential for the health and wellbeing of the Far North population.</p> <p>In particular protection of water supply catchments, both agricultural and drinking water to prevent the degradation of both quality and quantity of water to for</p>	<p>Ngā Tai Ora recommend that Council consider adding a Special Purpose Zone to provide for the identification and protection of critical infrastructure.</p>

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Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			extraction. Protection of waste water treatment plant locations to prevent encroachment and provide sufficient area for future expansion.	