

Further Submitter #24

Online Further Submission

Further Submitters Name	Lynley Newport
Further Submitter Number	FS24
Wish to be heard	Yes
FS qualifier	a person who has an interest in the proposal that is greater than the interest the general public has (e.g. land owner, resource user)
FS qualifier reason	I own land affected by zoning; overlays; objectives and policies; and associated rules; I am primary submitter; I am a professional planner operating in the district have an interest in ensuring workability and consistency within planning instruments.
Joint presentation	Yes
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Online further submitter?	Yes
Date raw FS lodged	01/09/2023 3:11pm

FS 24.1 - 24.72

Further submission points

Raw FS number	Original submitter	Related Submission Point	Plan section	Provision	OS Decision Requested	Support/Oppose	FS Decision requested	Reasons
FS24.1	Northland Federated Farmers of New Zealand	S421.002	Description of the district	Significant Resource Management Issue 2	Amend Issue 2 Rural sustainability as follows: The Rural Environment contains a number of There are competing demands for a range of land use activities in the Rural Environment. A The previous permissive planning framework has resulted led, in some areas, to in incompatible land uses, land fragmentation and significant adverse effects on rural character, amenity and indigenous biodiversity. In some cases, highly productive land (which includes including versatile soils) have been used in	Support in part	Allow in part	A one-size fits all approach to the Rural Production zoning and associated provisions is not sustainable and contrary to national policy framework direction.

such a way that ~~compromises~~ the future viability of primary production activities, such as horticulture and agriculture **has been compromised.** ~~and~~ **These uses have also** inappropriately used existing infrastructure and services. The current Rural Production Zone **has** applied a single set of provisions to the majority of the District; ~~which~~ **This approach does has** not addressed the specific issues faced ~~by~~ **in** the different rural areas and **their** communities. It is ~~also~~ important that the District Plan **clearly** reflects that rural settlements differ in their ability to access the infrastructure and services available in urban centres.

FS24.2	Northland Federated Farmers of New Zealand	S421.006	Definitions	HIGHLY PRODUCTIVE LAND	Retain the definition of 'Highly productive land'	Oppose	Disallow	The NPS for Highly Productive Land has now done this job for the FNDC, which must simply now repeat the definition of HPL as stated in that legislation, and any subsequent amendments
FS24.3	Northland Federated Farmers of New Zealand	S421.008	Definitions	NATIONAL GRID CORRIDOR	Retain the definition of 'National grid corridor'	Support	Allow	Agree with submitter
FS24.4	Northland Federated Farmers of New Zealand	S421.003	Definitions	New Definition	Insert a definition for 'Ancillary rural earthworks' as follows: ANCILLARY RURAL EARTHWORKS means <ul style="list-style-type: none"> any earthworks or disturbance of soil associated with cultivation, land preparation (including the establishment of sediment and erosion control measures), for planting and growing operations of crops and pasture; 	Support	Allow	Agree with Fed Farmers comments

- the harvesting of agricultural and horticultural crops (farming) and forests (forestry); and planting trees, removing trees and horticultural root ripping;
- the maintenance and construction of facilities typically associated with farming and forestry activities. This includes (but is not limited to): farm/forestry tracks, roads, vehicle manoeuvring areas and landings, stock marshalling yards, stock races, silage pits, offal pits, farm effluent ponds, feeding pads, digging post holes, fencing and sediment control measures, drilling bores, the installation and maintenance of services such as water pipes and troughs, off-stream farm water storage dams, hard stand areas for stock, fertiliser storage pads, airstrips and helipads; and
- farm quarries where quarry winnings are only used within the farm site.

FS24.5	Northland Federated Farmers of New Zealand	S421.040	Definitions	New Definition	Insert a definition for the term 'Critical Electricity Lines'	Support in part	Allow in part	Agree that a definition is required, but do not believe there is justification for 33 kV lines to be included
FS24.7	Northland Federated Farmers of New Zealand	S421.018	Natural Environment	SD-EP-O4	Amend Objective SD-EP-O4 as follows: Land use practices reverse climate change by enabling carbon storage and reducing carbon emissions: Council supports landowners to adopt climate change mitigation measures through sequestration,	Support	Allow	Submitter is expressing a sentiment shared and agreed with by farmers, of which I am one. Stop over regulating and penalising farmers.

new technologies, land use and science.

or wording with similar intent

FS24.8	Northland Federated Farmers of New Zealand	S421.039	Infrastructure	I-P7	<p>Amend Policy I-P7 as follows (inferred):</p> <p>Protect local, regionally and nationally significant infrastructure from the effects of incompatible land use and subdivision, including reverse sensitivity effects, which may compromise the operation and capacity of infrastructure by:</p> <p>a - d ...</p> <p>e. where there is no evidence of an appropriate easement on the relevant Certificate/s of Title, managing landuse and subdivision activities in proximity to Critical Electricity Lines to...</p> <p>f. where there is no evidence of an appropriate easement on the relevant Certificate/s of Title, managing land disturbance and activities sensitive to gas transmission to avoid, or mitigate potential adverse effects on, gas transmission pipelines; and</p> <p>g. where required, managing other activities; through the use of setbacks setbacks and appropriate design controls where necessary; to achieve the appropriate protection of local, regional and nationally significant infrastructure.</p> <p>or wording with similar intent</p>	Support in part	Allow in part	I agree with sentiment and have concerns in regard to infrastructure protection taking too much priority over operational aspects of farming, especially where the infrastructure network operator seldom provides compensation where their infrastructure prevents the use of land for other purposes.
FS24.9	Northland Federated Farmers of New Zealand	S421.041	Infrastructure	I-R11	Amend the activity status in Rule I-R11 from non-complying to restricted discretionary	Support	Allow	agree a more sensible default in category of activity is required.
FS24.10	Northland Federated Farmers of New Zealand	S421.098	Heritage area overlays	HA-O1	<p>Amend objective HA-O1 as follows:</p> <p>The heritage values of Heritage Area Overlays, as derived from the sites,</p>	Support	Allow	Agree that this objective appears to give absolute priority to heritage over all other factors.

buildings and objects of historic significance, archaeological sites and landform, are identified and protected **from inappropriate subdivision, use, and development.**

FS24.11	Northland Federated Farmers of New Zealand	S421.100	Heritage area overlays	HA-P13	Amend Policy HA-P13 as follows: To enable farming (inferred), subdivision and land use which recognises and protects the cultural and heritage values of Pouerua, and their strong connections and context of Pouerua scoria cone, Ohaewai volcanic field and Ngahuha scoria cone from inappropriate subdivision, use, and development.	Support	Allow	Too much priority afforded heritage - inconsistent with 6(f). There will be times when development IS appropriate without detriment to heritage values.
FS24.13	Northland Federated Farmers of New Zealand	S421.094	Heritage area overlays	Heritage Overlay - Pouerua	Amend the Overview to the Pouerua Heritage overlay so that it acknowledges and provides for existing, legally established rural activities as part of the existing environment	Support	Allow	agree with sentiment expressed, but also have concerns about the size/extent of Pouerua and Waimate North heritage layers as now mapped - impacts on a lot of rural production land.
FS24.14	Northland Federated Farmers of New Zealand	S421.097	Heritage area overlays	Heritage Overlay - Te Waimate	Amend the Overview to the Te Waimate Heritage overlay so that it acknowledges and provides for existing, legally established rural activities as part of the existing environment	Support	Allow	Agree with sentiment expressed and concerned at the large area covered by the Te Waimate heritage area.
FS24.15	Northland Federated Farmers of New Zealand	S421.112	Historic heritage	HH-O2	Amend Objective HH-O2 as follows: Land use and subdivision does not result in the loss or degradation of Heritage Resources. Historic heritage is protected from inappropriate subdivision, use, and development in the district. or wording with similar intent	Support	Allow	agree with sentiment expressed
FS24.16	Northland Federated Farmers of New Zealand	S421.127	Historic heritage	HH-P11	Delete Policy HH-P11, or if that relief is not accepted, amend as follows: Protect archaeological sites where there is a reasonable cause to suspect they are present, by ensuring	Support	Allow	Agree that as worded this policy creates uncertainty

land and subdivision activities have regard to: ...

or wording with similar intent

FS24.17	Northland Federated Farmers of New Zealand	S421.133	Ecosystems and indigenous biodiversity	IB-O1	Retain Objective IB-O1 or wording with similar effect	Oppose	Disallow in part	The submitter may have not understood what the rule suite in this chapter does - it doesn't just require an assessment where a permitted activity threshold is breached, it requires an assessment (at landowners' cost) simply to prove permitted activity status. This is not fair or reasonable. If FNDC wants farmers to regard the bush and habitat on their property as an asset, then incentivise, don't regulate and punish.
FS24.18	Northland Federated Farmers of New Zealand	S421.137	Ecosystems and indigenous biodiversity	Policies	Insert a new policy as follows: IB-P11 Provide recognition for grazing and farming existing activities that have not increased in their scale or intensity of effects from commencement date of the plan. or wording with similar intent	Support	Allow	A good inclusion.
FS24.19	Northland Federated Farmers of New Zealand	S421.145	Natural character	NATC-P2	Delete the concept of high natural character from Policy NATC-O2 (NATC-P2 inferred) and associated Appendix 1 Mapping methods and criteria.	Support	Allow	Agree - the Act separates high from outstanding quite deliberately.
FS24.20	Northland Federated Farmers of New Zealand	S421.156	Natural features and landscapes	NFL-R1	Amend PER-1 (inferred) of Rule NFL-R1 so that the maximum area of structures is 250m ² instead of 25m ²	Support	Allow	Agree with submitter. Additionally, a 25m ² farm building likely won't require a building consent, so the FNDC would find this requirement impossible to enforce and monitor in any event.
FS24.21	Northland Federated Farmers of New Zealand	S421.157	Natural features and landscapes	NFL-R2	Amend PER-1 of Rule NFL-R2 to include additional activities, being farming activities, emergency services work, and biosecurity works	Support	Allow	Agree with the sentiment expressed.
FS24.22	Northland Federated Farmers	S421.158	Natural features and	NFL-R3	Amend PER-1 of Rule NFL-R3 to include additional activities, being	Support	Allow	Agree with sentiment expressed.

	of New Zealand		landscapes		farming activities,emergency services works, and works required for access			
FS24.23	Northland Federated Farmers of New Zealand	S421.159	Natural features and landscapes	NFL-R6	Delete Rule NFL-R6	Support	Allow	Whilst acknowledging this only applies to new farming activities, it does not seem reasonable to require discretionary activity consent for new activities in an NFL that isn't in the coastal area.
FS24.24	Northland Federated Farmers of New Zealand	S421.171	Subdivision	SUB-O1	Retain Objective SUB-O1 or ensure that amendments include similar wording that achieves the same intent	Support in part	Allow in part	Only support in part because in recognising the need to protect highly productive land, the council should therefore make provision for the subdivision and development of rural land that does NOT fall within the definition of highly productive. One size does not fit all.
FS24.25	Northland Federated Farmers of New Zealand	S421.175	Subdivision	SUB-P8	Delete Policies SUB-P8 and SUB-P9 and replace with new policies that address the issues of managed growth of rural areas, protection of highly productive land and the use of benefit lots	Support in part	Allow in part	Agree that one size does not fit all. Council has created a regime where it believes that all rural land is the same. It is not. Incentivise habitat protection; the environmental benefit subdivision clause doesn't go nearly far enough; allow for development of rural land that is NOT highly productive.
FS24.26	Northland Federated Farmers of New Zealand	S421.178	Subdivision	SUB-R6	Amend RDIS-2 (inferred) of Rule SUB-R6 to allow for case-by-case approval for areas less than those listed in tables 1 and 2	Support in part	Allow in part	Makes similar points to my own submission except I have sought the retention of the environmental benefit provisions, greatly amended. Plan needs to make provision for much smaller discretionary lot sizes.
FS24.27	Northland Federated Farmers of New Zealand	S421.177	Subdivision	SUB-S1	Amend the minimum allotment size threshold for land zoned Rural Production in Standard SUB-S1 (inferred), decreasing it from 40ha to 20ha	Support	Allow	support reducing 40ha to 20ha
FS24.28	Northland Federated Farmers of New Zealand	S421.186	Coastal environment	CE-R1	Amend Rule CE-R1 as follows: <ul style="list-style-type: none"> Remove all references to the use and application of high character areas/layers Amend PER-2 to increase the size from 25m² to 250m² 	Support	Allow	agree with sentiment expressed

- Amend PER-2 to delete the requirement for a new building ancillary to farming activities to be located outside of outstanding natural character area

FS24.29	Northland Federated Farmers of New Zealand	S421.204	Rural production	Overview	Amend the Overview to recognise and provide for private property rights and allow landowners to subdivide land in the rural production zone for specific purposes such as creating lifestyle lots and lots for family members (amongst other matters)	Support	Allow	Agree with the sentiment. Need to recognise and support the need for diversity in our rural community and enable that to occur, not prevent. Not all rural land is highly productive and even when it is, there needs to be provision made for retirement lots and the like.
FS24.30	Northland Federated Farmers of New Zealand	S421.205	Rural production	Objectives	Amend the Objectives to recognise and provide for private property rights and allow landowners to subdivide land in the rural production zone for specific purposes such as creating lifestyle lots and lots for family members (amongst other matters)	Support	Allow	agree with sentiment - diversity is essential, as is sustainability. not all land and not all circumstances are the same. Too much emphasis on locking up all rural land for productive purposes with little thought given to alternative and appropriate use and lot size.
FS24.31	Northland Federated Farmers of New Zealand	S421.206	Rural production	Policies	Amend the Policies to recognise and provide for private property rights and allow landowners to subdivide land in the rural production zone for specific purposes such as creating lifestyle lots and lots for family members (amongst other matters)	Support in part	Allow in part	Support the sentiment - whilst important to protect highly productive land, the council has gone well beyond that in its approach, assuming all rural land is the same and preventing other sustainable uses.
FS24.32	Northland Federated Farmers of New Zealand	S421.213	Rural production	RPROZ-P2	Amend Policy RPZOZ-P2 to achieve consistency with the requirements of the National Policy Statement for Highly Productive Land and to recognise and provide for the rights of private landowners	Support in part	Allow in part	policies are inconsistent with NPS HPL - too much emphasis on HPL and blinkered assumption all land in the rural zone is HPL and has same characteristics. Council totally out of touch with its rural community
FS24.33	Northland Federated Farmers of New Zealand	S421.207	Rural production	Rules	Amend the Rules to recognise and provide for private property rights and allow landowners to subdivide land in the rural production zone for specific purposes such as creating lifestyle lots and lots for family members (amongst other matters)	Support in part	Allow in part	agree in sentiment. too much emphasis on HPL and in treating all rural land the same when it is not. no scope for diversity and initiative.

FS24.34	Northland Federated Farmers of New Zealand	S421.220	Rural production	RPROZ-R3	Delete the site area requirements from Rule RPROZ-R3	Support in part	Allow in part	40ha is arbitrary at best. rule needs to relate to adjusted minimum lot size (20ha sought) or even a smaller area.
FS24.35	Director-General of Conservation (Department of Conservation)	S364.007	General	General / Plan Content / Miscellaneous	Insert framework into the District Plan to promote pet-free subdivisions in high-density kiwi areas.	Oppose	Disallow	As DoC states, the north island brown kiwi has done well in the district - and that's without a restrictive and oppressive rule regime. Bring the community with you, don't alienate. Responsible pet ownership is what is needed, not total bans.
FS24.36	Tupou Limited	S487.001	General	General / Plan Content / Miscellaneous	<p>Insert a new category of Managed Indigenous Vegetation (MIV) with the following provisions:</p> <p>The basis for a good definition for MIV already exists under the NZ Emissions Trading Scheme. That is, the land must be eligible as post-1989 forest land:</p> <ul style="list-style-type: none"> - first established after 31 December 1989. - Wasn't forest land on 31 December 1989; or was forest land on 31 December 1989, but was deforested between 1 January 1990 and 31 December 2007; - is or will be planted in species that can reach at least 5m in height when mature - has/will have tree crown cover of more than 30% in each hectare - The post-1989 forest land definition should be adjusted to: - exclude the minimum size provision - include created wetlands - Pest and weed control is required - MIV cannot be included as SNA (possible exceptions with landowner 	Support in part	Allow in part	Interested in some of the concepts outlined in this submission but disagree that indigenous vegetation planted before 1989 should be treated any differently from that planted after 1989. No scientific justification and simply used as an 'administrative cut off date'.

agreement where the landowner receives some mitigation measure).

- Pruning, trimming, thinning are permitted activities.

- Clearance and any associated land disturbance are permitted activities.

- If any restrictions are required then as follows:

- In Rural Production Zone or Treaty Settlement Land Overlay: if it does not exceed 20% of the MIV over a 3-year period; or 5,000 m², whichever is greater.

- All other zones, if it does not exceed 10% of the MIV over a 5-year period; or up to 5,000 m², whichever is greater.

- Otherwise discretionary.

An alternative to creating a new district-wide category of MIV would be to create a Special Purpose Zone for Tupou, which adequately embraces and encourages what we are attempting to achieve for the property. An example of this is the poorly named Nature Preservation Zone in the Hastings District Council plan. Such a zone would allow (permitted activity) for:

- Vegetation clearance to a certain level for buildings, roads and tracks.

- Enhancement of accommodation offerings

- Subdivision that aligns with the nature conservation intentions of the zone

Key requirements for the zone would include:

- Pest control

- Archaeological and taonga sites for local hapu are not modified.

- All actions fit under an umbrella of "net biodiversity gain"

A key issue is that Special Purpose Zone removes the need to classify the area as an SNA with the associated restrictive controls.

FS24.37	Top Energy Limited	S483.162	General	General / Plan Content / Miscellaneous	Amend subdivision chapter to ensure that electricity and telecommunications infrastructure is adequately provided for at the time of subdivision	Oppose	Disallow in part	Electricity and telecommunications providers looked after quite well enough already. The submitter needs the good will of 'host' landowners, not their animosity.
FS24.38	Matauri Trustee Limited	S243.024	Ecosystems and indigenous biodiversity	IB-P1	Delete Policy IB-P1	Support	Allow	The submitter has identified a valid 'procedural' / 'legislative' issue - process for populating a Schedule needs to be clarified.
FS24.39	Sean Frieling	S357.034	Ecosystems and indigenous biodiversity	IB-P1	Acknowledge that ratepayers have managed to enhance the SNA in the District, facilitate and assist them in what they are already doing. Modify the approach to mapping and identification of SNA in accordance with the draft NPS for indigenous biodiversity. Insert incentives, not disincentives for landowners to enhance the natural biodiversity of their land. Amend the options for bush protection. Make SNA mapping available to the public.	Support	Allow	Submitter quite correctly points out all the negative and restrictive approaches being taken by FNDC - need to look to a positive, innovative and incentives approach
FS24.40	Director-General of Conservation (Department of Conservation)	S364.034	Ecosystems and indigenous biodiversity	IB-P1	Amend Policy IB-P1 as follows: Identify Significant Natural Areas by: a.using the ecological significance criteria in Appendix 5 of the RPS or in any more recent National Policy Statement on indigenous biodiversity; b.including areas that meet the ecologicalsignificance criteria as Significant Natural Areasin Schedule 4 of the District Plan and on	Oppose	Disallow	too much emphasis on what a landowner MUST do, at their expense. whilst there is a valid cautionary note in regard to legislative process for populating a schedule, I do not agree with DoC's mandatory stance.

~~the planning maps where this is agreed with the landowner and verified by physical inspection where practicable;~~

~~c. encouraging landowners to include including identified Significant Natural Areas in Schedule 4 of the District Plan at the time of subdivision and development;~~

~~d. providing assistance to landowners to add Significant Natural Areas to Schedule 4 of the District Plan, and~~

~~e. requiring an assessment of the ecological significance for indigenous vegetation clearance to establish permitted activity thresholds in Rule 1BR2-R4.~~

FS24.41	Director-General of Conservation (Department of Conservation)	S364.040	Ecosystems and indigenous biodiversity	IB-P5	Amend Policy IB-P5 as follows: Ensure that the management of land use and subdivision to protect Significant Natural Areas and maintain indigenous biodiversity is done in a way that: a. does not impose unreasonable restrictions on existing primary production activities, particularly on highly versatile soils; b. recognises the operational need and functional need of some activities, including regionally significant infrastructure, to be located within Significant Natural Areas in some circumstances; c. allows for maintenance, use and operation of existing structures, including infrastructure; and d. enables Māori land to be used and developed to support the social, economic and cultural well-being of tangata whenua, including the provision of papakāinga, marae and associated residential units and infrastructure.	Oppose	Disallow	do not agree with the suggested changes.
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FS24.42	Arahaia Burkhardt Macrae	S255.003	Ecosystems and indigenous biodiversity	IB-R1	Insert a new rule equivalent to SUB-R6 (Environmental Benefit Subdivision) but for landuse which Rewards landowners who have already protected areas, and incentivises landowners to protect areas.	Support	Allow	I believe this concept has considerable merit.
FS24.43	Sean Frieling	S357.036	Ecosystems and indigenous biodiversity	IB-R4	Acknowledge that ratepayers have managed to enhance the SNA in the District, facilitate and assist them in what they are already doing. Modify the approach to mapping and identification of SNA in accordance with the draft NPS for indigenous biodiversity. Insert incentives, not disincentives for landowners to enhance the natural biodiversity of their land. Amend the options for bush protection. Make SNA mapping available to the public.	Support	Allow	agree with the sentiment. too much restrictive regulation and not enough incentives.
FS24.44	Northland Regional Council	S359.029	Subdivision	Objectives	Amend the objectives to strongly discourage fragmentation of rural land.	Oppose	Disallow	central and local government has done quite enough to throttle diversity in the rural area. Agree with protecting highly productive land from fragmentation, but not all rural land is highly productive. Neither is there an expectation by rural land owners to receive council provided services. reverse sensitivity remains a valid consideration, but there are alternative mitigation measures to simply preventing subdivision.
FS24.45	Shanon Garton	S161.003	Subdivision	SUB-O2	Amend to: <ul style="list-style-type: none"> Acknowledge that ratepayers have managed to enhance the SNAs in the District, instead of forcing them to do this, facilitate and assist them in what they are already doing 	Support	Allow in part	There is considerable merit in the points being made in this and like worded submissions. FNDC needs to consider them.

- Given that the council is required to undertake mapping and identification of SNAs under the NPS-IB, approach should be modified to work in partnership with landowners
- Provide incentives (support and resources), not disincentives, for landowners to enhance the natural biodiversity of their land
- If owners wish to protect their bush, the option of a simple bush protection covenant by consent notice should be available, not just Reserves Act and QEII covenants.
- Make SNA mapping available publicly, even if it is not part of the PDP.

FS24.47	Sean Frieling	S357.007	Subdivision	SUB-O2	Delete paragraph a) of SUB-O2, so that protection of highly productive land is not an objective of subdivision.	Support in part	Allow in part	Needs to be a distinction between HPL and non HPL in order to give effect to the NPS-HPL and any subsequent amendments
FS24.48	Top Energy Limited	S483.164	Subdivision	SUB-O3	Retain Objective SUB-O3	Oppose	Disallow	TE needs to acknowledge that not everybody wants or needs conventional power supply. Multiple alternatives exist and renewable energy sources should be encouraged.
FS24.49	Pacific Eco-Logic	S451.005	Subdivision	Policies	Insert policies that: 1. Clarify that significant indigenous vegetation and significant habitats of indigenous fauna, (including the balance lot) are to be protected as part of a subdivision 2. Require cat and/or dog-free subdivision in areas of particular importance for vulnerable	Oppose	Disallow	disagree that the matters raised are not adequately covered already. No need for additional policies.

indigenous wildlife (e.g., kiwi, matuku, shorebirds)

3. Require sewage and stormwater management to prevent nutrients and sediment from reaching natural waterways, including natural wetlands

4. Identify priorities where riparian fencing and planting should be a condition of subdivision

FS24.50	Northland Regional Council	S359.030	Subdivision	Policies	Amend the policies to strongly discourage fragmentation of rural land.	Oppose	Disallow	it is not true to state that fragmentation to rural land should be prevented in all instances.
FS24.51	Leah Frieling	S358.008	Subdivision	SUB-P8	Amend policy SUB-P8, by adding more circumstances where rural lifestyle bocks can be allowed in the Rural Production Zone, especially around existing houses.	Support	Allow	Agree that consideration needs to be given to smaller minimum lot sizes in certain circumstances.
FS24.52	Paul O'Connor	S49.005	Subdivision	SUB-P8	Amend to Provide a simple bush protection covenant by consent notice, instead of just the Reserves Act and QE111 covenants	Support	Allow	agree means of protection can be simpler than only being able to utilise QE11 or reserves act instruments
FS24.53	Carbon Neutral NZ Trust	S529.145	Subdivision	SUB-P8	Amend SUB-P8 as SNA protection should be an essential prerequisite for any rural subdivision to be approved, not a means of getting additional lots	Oppose	Disallow	Submitter seems intent on continuing to impose requirements on rural landowners to perform a service to the community and environment, on behalf of, and benefitting many others, without any incentive or even recognition of doing so.
FS24.54	Leah Frieling	S358.009	Subdivision	SUB-P9	Delete policy SUB-P9	Support	Allow	I do not believe P-9, with the use of the word 'avoid', should remain.
FS24.55	Michael Foy	S472.009	Subdivision	SUB-P9	Delete policy SUB-P9, which further limits rural lifestyle bocks in the Rural Production Zone.	Support in part	Allow in part	agree that the overly restrictive minimum lot size regime being proposed will be detrimental to the vitality and diversity of the rural area.
FS24.56	Pacific Eco-Logic	S451.006	Subdivision	SUB-P11	Insert the following to the list of matters to be considered when Council assesses land use and subdivision consent applications:	Oppose	Disallow	Requested decision turns a policy (already reading like assessment criteria) in a list of assessment criteria - this is NOT a policy.

1. The quality and extent of the indigenous ecosystems and elements present
2. The potential impact of the proposed activity on the biodiversity values of the native vegetation present on, and in the vicinity of, the property
3. The type and extent of legal and practical protection being provided to protect indigenous ecosystems and elements
4. The type and scale of ecological restoration and protective management being proposed (e.g., pest control)
5. The potential hazards posed by the construction and ongoing new activities on at-risk wildlife
6. Controls on pet ownership to protect at-risk wildlife

FS24.57	Pacific Eco-Logic	S451.007	Subdivision	Rules	<p>Insert additional rules for subdivisions, other than environmental benefit lots, to address the protection of indigenous vegetation and habitats of indigenous fauna.</p> <p>These rules should include</p> <ol style="list-style-type: none"> 1. The protection of significant indigenous vegetation and significant habitats of indigenous fauna (including the balance lot) as part of a subdivision 2. The requirement for cat and/or dog-free subdivision in areas of particular importance for vulnerable indigenous wildlife (e.g., kiwi, matuku, shorebirds) 	Oppose	Disallow	I agree with the protection of significant flora and fauna, but not by way of a harsh and overly restrictive rules regime. Much more emphasis has to be on incentives and rewards.
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FS24.58	Director-General of Conservation (Department of Conservation)	S364.003	Subdivision	Rules	Amend the Subdivision chapter to include more stringent controls to allow for the consideration and scheduling of SNAs in the subdivision chapter.	Oppose	Disallow in part	Doc, as a representative of gov't, therefore needs to support landowners in protecting indigenous vegetation. Central gov't needs to support landowners in protecting indigenous vegetation - e.g. offer carbon credit for existing trees as well as newly planted area. Don't add more stringent controls, add more innovative and positive incentives.
FS24.59	Horticulture New Zealand	S159.070	Subdivision	SUB-R3	<p>Delete the reference to the Rural Production zone and Horticulture zone from the controlled activity rule.</p> <p>Insert a new line in Rule SUB-R3 Rural Production and Horticulture zone as follows:</p> <p>Activity status – Restricted discretionary</p> <p>RDIS-1</p> <p>Where subdivision complies with standards:</p> <ul style="list-style-type: none"> • SUB-S1 minimum lot sizes • SUB-S2 Requirements for building platform for each allotment • SUB-S3 Water supply • SUB-S4 Stormwater management • SUB-S5 Wastewater disposal • SUB-S6 Telecommunications and power supply • SUB-S7 Easements for any purpose <p>Matters of discretion are limited to:</p> <ul style="list-style-type: none"> • Matters of control in SUB-R3 • The potential adverse effects on adjoining 	Oppose	Disallow	Controlled activity status is afforded to subdivision the FNDC deems acceptable without the need for written approvals. This does not prevent the Council from seeking comment from a potentially affected person such as an orchardist, but only insofar as determining if there are conditions of consent that could be imposed. Retain controlled activity status.

**horticultural and
agricultural activities,
including reverse
sensitivity effects**

**NOTE: Applications for restricted
discretionary subdivision within
the Horticulture zone and the
Rural Production zone will be
notified**

**Activity status where compliance
is not achieved - Discretionary**

FS24.60	Top Energy Limited	S483.168	Subdivision	SUB-R10	Amend the wording of Rule SUB – R10 to: SUB -R10 Subdivision of a site within 32m of the centre line of Critical Electricity Line Activity status: Restricted Discretionary Where: PER - 1 The proposed building platforms are identified outside of a 32m setback from the centre line of a CEL Activity Status where not achieved: Non-complying	Oppose	Disallow	Too restrictive both in terms of suggested setback and category of activity default.
FS24.62	Jeanette Mcglashan	S17.001	Subdivision	SUB-S1	Amend the minimum allotment sizes for Rural Production Zone, to allow smaller lot sizes. Seeks that existing (Operative District Plan) allotment sizes for the Rural Production Zone are reinstated (inferred).	Support	Allow	Agree rural production can occur on smaller holdings also council needs to acknowledge that not all rural land is highly productive, so smaller lot sizes are sustainable and NOT detrimental to rural productivity.
FS24.64	Paul O'Connor	S47.002	Subdivision	SUB-S1	amend rural production allotment sizes to allow smaller lot sizes on less productive land	Support	Allow	what is being suggested is logical

FS24.65	Northland Regional Council	S359.015	Subdivision	SUB-S1	Amend the thresholds applying to the Horticulture zone in standard SUB-S1, to increase the lot sizes.	Oppose	Disallow	I'm not sure I could support increasing minimum lot sizes in the Horticulture Zone if this zone is supposed to apply to the best highly productive soils in the district. Have had some examples where productivity of soils is not that great, begging the question of accuracy of zoning application.
FS24.66	Matauri Trustee Limited	S243.109	Rural production	RPROZ-O2	Amend Objective RPROZ-O2 The Rural Production zone is used for primary production activities, ancillary activities that support primary production and other compatible activities that have a functional need to be in a rural environment.	Support	Allow	agree with sentiment being expressed.
FS24.67	Director-General of Conservation (Department of Conservation)	S364.002	SCHED4 - Schedule of significant natural areas	SCHED4 - Schedule of significant natural areas	Insert SNAs in the plan using the report prepared for Council titled "Significant Indigenous Vegetation and Habitats of the Far North District - Volume 1" prepared by Wildlands Consultants (Contract Report No. 4899d, December 2019) to include SNAs in the Proposed District Plan.	Oppose	Disallow	If Council was to follow this path it would have to re-notify its entire section on IB and any related provisions elsewhere in the plan. It is simply too large a change to do via a decision on a submission.
FS24.68	P S Yates Family Trust	S333.001	General	General / Process	Insert a new clause specifying that if an overlay is shown on the Planning Maps, the overlay provisions only apply to the portion of the property covered by the overlay.	Support	Allow	Good point raised by submitter. Confusing for a land owner as to what provisions apply where in the instance where an overlay only applies partially to their land. Agreed with decision sought by submitter.
FS24.69	Northland Regional Council	S359.009	General	General / Plan Content / Miscellaneous	Amend the planning maps to align with updated NRC hazard maps (inferred)	Support in part	Disallow in part	Whilst the most up to date hazard mapping is essential, there is a process issue to be considered. the Council cannot simply change maps - the issue is district wide and any updates or changes to hazard mapping would need to go through the full Schedule 1 plan change process every time there is a change. If there are immediate changes sought by the NRC, then the hazards section of the PDP and associated maps would have to be re-notified.

FS24.70	Vision Kerikeri (Vision for Kerikeri and Environs, VKK)	S522.028	General approach	District Plan Framework	Amend planning maps to add coastal overlays, or similar mechanism, to all coastal areas visible from marine areas, so that coastal landscapes, coastal character and coastal environments will be protected appropriately.	Oppose	Disallow	The PDP coastal environment overlay, as I understand it, reflects the coastal environment as defined in the RPS higher order document. To alter them would mean being inconsistent with that higher order document, which a PDP cannot be.
FS24.71	Michael Foy	S472.030	Rural production	Objectives	Amend the Rural Production Zone objectives so that productive land is defined based on its ability to produce food but can accommodate things other than rural production; OR amend Planning Maps to remove RPROZ from urban areas as separately submitted.	Support in part	Allow in part	This is a big issue that will need to be addressed and probably cannot be done via submissions. The Council has applied a one-size fits all approach to most of the rural land within the district, zoning it Rural Production - inferring all rural land is productive, i.e. suitable for growing things. This is not true. Soil type; climatic conditions; topography; size of property; existing land uses - all contribute to productivity of a site. Perhaps the time is right for the Council to re-examine where it has applied the Rural Production zone and consider if this can and should be split between Rural Production and simply General Rural as well as giving serious consideration to re-visiting the zoning of areas already removed from 'production', i.e. too small; supporting alternative land uses, so that they are zoned something more appropriate than rural production - when the land can clearly not be used for rural production purposes any more. It is appreciated that this matter cannot be addressed simply through submissions and that there may need to be a re-notification of parts of the PDP, but I believe it is worth the effort.

FS24.72	Heritage New Zealand Pouhere Taonga	S409.049	Planning maps	Heritage Area	Insert new heritage areas (including associated mapping, overview, objectives, policies and rules) as indicated in submission	Oppose	Disallow	This is seriously excessive. Cannot be supported. In any event it covers so many areas that any change such as that being sought would require an entire renotification under Schedule 1 processes, with full section 32 re-analysis; submission and further submission processes.
FS24.73	John and Rose Whitehead	S535.002	Planning maps	Horticulture Zone	Delete the proposed Horticulture zone in its entirety, rezoning areas Rural Production, General Rural, Commercial or Rural Residential as appropriate.	Support	Allow in part	The Council needs to re-visit its zoning approach for all rural land in the district, especially since the NPS for HPL (with all its flaws) is now in place. This will be a major exercise that cannot be done simply in response to submissions. A re-write and re-notification will be required. Note - this further submission is focused on process rather than suggesting what zoning should apply where.
FS24.74	Jeff and Robby Kemp	S51.002	Planning maps	Rural Production Zone	Amend the land in Waitotara Drive zoned Rural Production to Rural Residential Zone, identified in Figure 1 of the submission.	Support	Allow	This submission is representative of other instances where the Council has applied an inappropriate zoning to land clearly unable to be utilised for the purpose of that zone - meaning any land use on the site is automatically contrary to the zone's objectives and policies. Waitotara Drive, for instance, is not rural production land - it is essentially residential in nature and use. Land like this should be zoned accordingly - rural residential in this case, as suggested. I believe Council has an abundance of other tools, such as map overlays, to address constraints to use of land without applying an illogical zoning (and associated lot sizes) as a default (and appropriate) tool to prevent inappropriate development.

FS24.75	Te Hiku Community Board	S257.024	Planning maps	Rural Production Zone	Amend the Planning Maps by removing the Rural Production Zone from areas developed with infrastructure for urban development and substitute an appropriate urban zone; OR amend Rural Production Zone objectives, policies and rules as separately submitted.	Support	Allow in part	As a general comment, the Operative District Plan also included areas of small lot sizes, residential in nature, in the Rural Production Zone. The PDP was the opportunity to look at all such areas and zone something other than Rural Production - which the small residential lots clearly cannot support as a land use. The PDP captures some of these areas in its new Settlement Zone, but not all.
FS24.76	Wendover Two Limited	S222.082	Planning maps	Rural Production Zone	Amend the "Rural Production" zone in every instance in the Proposed District Plan to "General Rural" zone.	Support in part	Allow in part	Definitely merit in re-visiting the names given to rural zones. Difficult, however, to not use the term "production" given the NPS - Highly Productive Land. I believe it more appropriate to review rural zoning per se and differentiate between Rural Production and General Rural (and Horticulture for that matter - also related to the idea of "production").
FS24.78	Carbon Neutral NZ Trust	S529.168	Planning maps	General / Miscellaneous	Insert NZ Land Resource Inventory maps into PDP	Oppose	Disallow	Not needed. Council's Far North Maps already supplies the info and as a resource outside the District Plan, it can be updated without Schedule 1 processes. As the submitter states, it is only a guide in any event.