

4 September 2023

Far North District Council
Proposed District Plan Planning and Policy
Via email: pdp@fndc.govt.nz



THE PLANNING
COLLECTIVE

Dear Sir / Madam

RE: Further submissions to the proposed Far North District Plan

The attached further submissions are made on behalf of Kiwi Fresh Orange Company Limited (“KFO”)– Submitter Number 554 to the proposed Far North District Plan (“pFNDP”).

KFO lodged a comprehensive submission to the pFNDP seeking the rezoning of approximately 197 hectares of rural land it owns located between Kerikeri and Waipapa for urban land uses. A Precinct is proposed to enable greenfields land to be zoned now and provide sufficient certainty to secure integrated planning and investment for the required infrastructure, to secure outcomes to manage flood risk and the amount of retail floor space to ensure future development does not detrimentally affect the Kerikeri Town Centre.

KFO’s landholding, the nature of its submission and the impact of the pFNDP on KFO’s land means that KFO has an interest greater than the public generally in relation to many aspects of the pFNDP and the submissions made to it.

The nature of KFO’s further submissions seek to identify interest in decisions sought that may adversely affect the KFO proposal, or could have a direct influence, positively or negatively, on the submission and the outcomes it seeks. To this end the KFO further submissions relate to all aspects of the pFNDP related to zoning, subdivision and land development.

There are also submissions that seek provisions of a non-specific nature be added to the Plan to address new National Policy Statements (eg NPS IB). Whilst the need for the Plan to give effect to any National Policy Statement is supported, the submissions seeking the additional and non-specific provisions are supported in principle only, subject to the content of the changes to be made.

The attached Table lists all the submissions that further submissions are made in relation to, the particular parts of the submission KFO supports or opposes and the reasons why.

KFO wishes to be heard in support of its further submissions.

Yours sincerely

Burnette O’Connor
The Planning Collective Limited
Ph: 021422346
Email: burnette@thepec.co.nz

Attachments:

- A. Further Submissions Table.
- B. Addresses of Submitters

Attachment A

Further Submission on behalf of Kiwi Fresh Orange Company Limited – 4 September 2023

Sub #	Sub Point	Submitter	Theme	Summary	Decision Requested	Further Submission		Decision requested
						Support / oppose	Reasons	
General Process								
#338	006 - 008	Our Kerikeri Community Charitable Trust	Urban design	Consider the PDP should enshrine the principles/design qualities of the Urban design Protocol etc. Consider that spatial plans should be prepared.	The PDP should include provisions that support urban design principles for quality and innovative developments that cater for mixed use, mixed dwellings and mixed income levels, whilst protecting and preserving the characteristics of respective townships and the things that communities value.	Support	Implementation of urban design principles is a cornerstone to achieving well-functioning urban environments.	Allow the submission, subject to appropriate drafting FS25.001, FS25.002, FS25.003
#338	013	Our Kerikeri Community Charitable Trust	General process	The Operative DP contains a chapter on development financial contributions (chapter 14). However, some years ago the council eliminated most requirements for development contributions. This has resulted in a large, accumulated shortfall in infrastructure and related funding, and ratepayers are unfairly expected to carry this cost burden.	Amend the PDP to require development contributions when Council has adopted policy on development contributions as part of its Long-Term Plan (Inferred)	Support	Development contributions under the Local Government Act are an appropriate mechanism. While development contributions are generally dealt with under separate policy instruments, it may be appropriate to include reference to development contributions in the pFNDP.	Allow the submission, subject to appropriate drafting. FS25.004
#428	003	Kapiro Residents Association	General process	The PDP fails to address the urgent need to reduce greenhouse gas emissions wherever possible now and fails to adequately avoid or mitigate the anticipated effects.	Amend PDP to include policies/rules/standards that will reduce greenhouse gas emissions related to the activities covered by district plans.	Support	KFO supports including provisions that encourage quality, compact built form to, among other things, reduce greenhouse gas emissions.	Allow the submission, subject to appropriate drafting. FS25.005
#429	009	Kapiro Residents Association	General process	In areas where freshwater issues are relevant to District Council functions and the DP, the NPS Freshwater Management of 2020 needs to be given effect in all relevant parts of the DP, including the Ecosystems & Biodiversity chapter and Natural Character chapter.	Amend the Plan to ensure that when subdivision, land use or development is considered, it gives effect to: -the NPS FM's fundamental concept of Te Mana o te Wai (including the principles and the hierarchy of obligations) should be applied to all freshwater issues that may be affected by development, not just the aspects of freshwater management referred to in the NPS (this point is stated in NPS FMs1.3(2)) Policies and rules to promote positive effects and avoid, remedy, or mitigate adverse effects (including cumulative effects) of urban development on the health and wellbeing of water bodies, freshwater ecosystems, and receiving environments (NPS FM s3.5(4)) Avoiding the loss of wetlands and protecting their values: ... -When subdivision or development takes place, all waterways should be protected by requirements for native planting and other measures.	Support	KFO supports the proposal that subdivision, land use and development is managed in an integrated way to achieve the concept of Te Mana o te Wai. KFO is interested to ensure that the proposed provisions are the most appropriate way to achieve the objectives of the pFNDP.	Allow the submission, subject to appropriate drafting. FS25.006
#429	012	Kapiro Residents Association	General process	We consider that the PDP should take on board the changes proposed in submissions made by Forest & Bird, Pacific Eco-Logic and Marianna Fenn. In cases	Amend District Plan as sought by Forest & Bird (submitter 511), Pacific Eco-Logic (submitter 451) and Marianna Fenn (submitter 542), unless relief	Support in part	Elements of the submissions by Forest & Bird, Pacific Eco-Logic and Marianna Fenn are appropriate, however, it is questionable whether some of the relief sought is the most	Allow the submission in part, subject to appropriate drafting. FS25.007

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				where our proposed changes differ, we seek the changes that will provide the strongest protection for the natural environment.	sought by Kapiro Residents Association is more onerous		appropriate way to achieve the purpose of the RMA or the objectives of the pFNDP.	
#449	003	Kapiro Conservation Trust	General process	We support intensification of the urban area. However, intensification needs to be carefully planned, with good design principles, appropriate infrastructure and adequate green open spaces for the community. Subzones or precincts (or whatever terms are now required by the National Planning Standards) need to be identified to achieve good connectivity, good functionality and protect character and amenity values. Subzones are needed to ensure that building height and density are reduced in a graduated manner moving out from the central area to high density residential areas and then lower density residential areas. Policies/rules are also needed to avoid pepper-potting multi-storied buildings in diverse locations in random fashion. Within close distance to Kerikeri township, there are limited opportunities to develop greenfield land for future growth. We consider that the PDP zoning, at present, does not focus on greenfield sites that are more appropriate for future growth, taking into account potential for infrastructure, connectivity, traffic, and other issues.	Amend the zoning framework to introduce more subzones or precincts as per the National Planning Standards to achieve good connectivity, good functionality and protect character and amenity values.	Support	Given anticipated growth in the Kerikeri and Waipapa areas, the pFNDP zoning needs to focus on greenfield sites which are more appropriate for future development. The level of urban development required to meet expected demand cannot be provided by infill development alone.	Allow the submission subject to appropriate mapping and wording. FS25.008
#465	001	Groundswell NZ	General process		Seek to pause the district plan process until the failings of the RMA outlined in this submission are addressed, and there is clarity around the NPS Indigenous Biodiversity and the RMA replacement the Natural and Built Environment Act (NBA). If this is not accepted, then our submission would be the sections relating to the zoning issues above be paused or removed altogether.	Oppose	Delaying the preparation of the second-generation District Plan is neither an efficient nor effective response to the submitters concerns around the NPS-IB or reform of the RMA.	Reject the submission. FS25.009
#524	001	Vision Kerikeri	General process	Support planned growth as this helps ensure efficient and effective infrastructure, and connectivity. While it is acknowledged that there are no current growth strategies or structure plans, some are in development, and could be completed prior to the PDP being made Operative. To ensure that these strategic documents can be given effect and implemented once approved by Council, provisions and assessment criteria that hold a space for these planning documents should be included.	Continue to develop spatial and strategic direction for the District's urban centres and include place holding provisions throughout the plan	Support	The pFNDP should give effect to and implement strategic documents addressing planned growth for reasons including that adequate infrastructure must be in place to support development.	Allow the submission FS25.0010
#529	003	Carbon Neutral NZ Trust	General process	We support intensification of the urban area for the reasons outlined in our previous submissions and discussions with council. However, intensification needs to be carefully planned, with good design principles, appropriate infrastructure and adequate green open spaces for the community. Sub zones or precincts (or whatever terms are now required by the National Planning Standards) need to be identified to achieve good connectivity, good functionality and protect	Amend the zoning framework to introduce more subzones or precincts as per the National Planning Standards to achieve good connectivity, good functionality and protect character and amenity values.	Support in part	KFO supports including additional zones or precincts where that is appropriate to provide a specific response to a particular site.	Allow the submission subject to appropriate mapping and wording. FS25.011

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				character and amenity values. Subzones are needed to ensure that building height and density are reduced in a graduated manner moving out from the central area to high density residential areas and then lower density residential areas. Policies/rules are also needed to avoid pepper-potting multi-storied buildings in diverse locations in random fashion.				
#529	066	Carbon Neutral NZ Trust	General process	Support planned growth as this helps ensure efficient and effective infrastructure, and connectivity. While it is acknowledged that there are no current growth strategies or structure plans, some are in development, and could be completed prior to the PDP being made Operative. To ensure that these strategic documents can be given effect and implemented once approved by Council, provisions and assessment criteria that hold a space for these planning documents should be included.	Continue to develop spatial and strategic direction for the District's urban centres and include place holding provisions throughout the plan.	Support	The pFNDP should give effect to and implement strategic documents addressing planned growth.	Allow the submission FS25.012
#559	001	Te Runanga o Ngāti Rēhia	General process	Urban Sustainability and Affordable Infrastructure are of interest to Ngāti Rēhia, including better management of urban infrastructure, land and building resources to reduce wasted and insufficient use of existing land and infrastructure resources that increase the living costs. The studies alongside affordable housing options, would assist in meeting SD-UFD-O1.	Amend to prioritise working with Ngāti Rēhia and the hapū of Kerikeri Waipapa on cultural and historical heritage inventories to be initiated as an integral part of this plan.	Support	KFO wholeheartedly supports the aspiration of Ngāti Rēhia to develop cultural and historical inventories and better manage urban infrastructure.	Allow the submission. FS25.013
#559	008	Te Runanga o Ngāti Rēhia	General process	For example, there are amenity-based rules on 'reflectivity', building height or similar that unduly limit opportunities for small to medium scale solar or wind generation.	Amend land use to ensure there are no impediments to climate change mitigation.	Support	KFO wholeheartedly supports the aspirations of Ngāti Rēhia in respect of climate change mitigation.	Allow the submission. FS25.014
#560	004	Jane Johnston	General process	There is a need to provide for accommodation that is affordable and accessible to work, education and recreation opportunities. Accommodation as per the PDP fails to provide for young adults (new entrant workers or students), as well as for the home-alone elderly. The PDP does not cater to all options or 'potential' choices for people throughout their life-cycle, in being heavily biased towards providing for 'families' rather than for individuals or other groups who may choose to want to cohabitate. The requirements of a minimum size of section, a cap on the number of units able to be accommodated per section, outdoor living space and yard to boundary rules prohibit high density residential accommodation, without a relationship with 'commercial' use as provided for in the mixed-use zone.	Insert a new high density residential zone which provides choice at the opposite end of the continuum from 'rural-residential', 'rural lifestyle' and 'coastal-living' as per the operative plan and does not require a commercial ground floor level.	Support	KFO supports the proposal to include additional housing choice by providing for high density dwellings in appropriate locations.	Allow the submission, subject to appropriate wording. FS25.015
General Plan Content								
#138	021	Kairos Connection Trust and Habitat for Humanity	General plan content	To further improve housing choices for low-moderate income households in the Far North and in addition to the amendments sought in the submission, seek that the Council consider including a separate Inclusionary Housing chapter, or integrate throughout proposed subdivision and residential and mixed use zone chapters, provision for inclusionary housing that would	Insert a separate Inclusionary housing chapter or integrate throughout proposed subdivision and residential and mixed use zone chapters, provision for inclusionary housing that would require a 5% share of the estimated value of the sale of subdivided lots (or as appropriate to the Far North context) to a nominated community housing	Oppose	While KFO supports the aspiration of having affordable housing for low-moderate income households, it does not support the proposed inclusionary housing mechanism. No assessment has been provided of the costs and benefits of such a scheme in the Far North District to support an understanding of whether the proposal is the most	Disallow the submission. FS25.016

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				require a 5% share of the estimated value of the sale of subdivided lots (or as appropriate to the Far North context) to a nominated CHP to ensure the establishment of affordable housing within its high growth urban environments. The appropriate % share of lots would need to be determined for the Far North District, as it would essentially be a financial contribution condition for which a district plan policy is required under Section 108 (10).	provider to ensure the establishment of affordable housing within its high growth urban environments.		appropriate way to achieve the purpose of the RMA or the objectives of the pFNDP.	
#215	052	Haigh Workman Limited	General plan content	Inconsistencies in stormwater rules	Insert a new chapter to the General District-Wide Matters addressing Stormwater Management (or Impermeable Surfaces generally) including overview, objectives, policies and rules in a similar way to the section on Earthworks management	Support	KFO supports the intent of including a new chapter that improves the clarity and usability of the pFNDP by grouping provisions relating to stormwater management in a single place.	Allow the submission subject to appropriate wording. FS25.017
#252	006	Hall Nominees	General plan content	<p>The Mixed Use Zone is not the most appropriate zone for Kerikeri town centre for the following reasons:</p> <p>a. The Mixed Use Zone does not give effect to objective 1 and policy 1 of the National Policy Statement on Urban Development (NPS-UD);</p> <p>b. The Section 32 Evaluation - Urban Environments incomplete and flawed:</p> <p>i. The evaluation does not provide sufficient level of detail that corresponds to the scale and significance of due to the importance of the zone being the only commercial zone proposed within the District;</p> <p>ii. The evaluation fails to consider the full range of commercial zoning options and identify reasonably practicable options to achieve objectives;</p> <p>iii. The evaluation fails to evaluate appropriate zone criteria and boundaries;</p> <p>c. The PDP does not provide strategic direction or policy support for the suite of urban zones proposed;</p> <p>d. The Mixed Use Zone provisions do not sufficiently enable a range of commercial activities.</p> <p>The PDP does not provide alternative commercial zones, providing only a Mixed-Use Zone. The Section 32 Evaluation - Urban Environment does not provide any justification for this approach nor does it evaluate options utilising the full range of National Planning Standard commercial zones. The PDP does not include any form of direction by way of mapping or provisions to set a clear hierarchy of centres. This lack of strategic direction will hinder the ability to achieve a sustainable and compact urban form.</p> <p>The approach to commercial zoning within the PDP has resulted in the inability to utilise the Mixed Use Zone as intended by the National Planning Standards. This approach has led to ineffective and inefficient methods</p>	<p>Amend the suite of commercial zones proposed and rezone Kerikeri town centre to Town Centre Zone (or similar commercial zone) that appropriately reflects commercial development and activities within Kerikeri township; OR</p> <p>If above relief is not accepted, amend the Mixed Use zone provisions to provide for an increased range of commercial and community activities.</p>	Support	KFO supports the intent of the submission to provide greater flexibility for development in the Kerikeri town centre. KFO agrees with the submitter that Kerikeri and Waipapa comprise an urban environment that must give effect to the NPS-UD.	Allow the submission, subject to appropriate wording FS25.018

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				in the PDP, which does not provide for the sustainable development and use of business land.				
#339	016	Te Aupōuri Commercial Development Limited	General Plan Content	The Strategic Direction chapters do not contain policy which gives effect to proposed objectives. TACDL considers that there is no clear policy direction to give effect to the proposed objective which could lead to an ineffective plan.	Amend the Strategic Direction Chapter to: <ul style="list-style-type: none"> Provide clear direction for growth and development throughout the Far North District. Include appropriate policy to give effect to strategic direction objectives. Evaluate objectives in accordance with section 32AA to confirm that these are the most appropriate objectives. 	Support in principle	Definitions and nesting tables can change the outcomes of what things mean. The strategic direction and request to include policy to give effect to the strategic direction objectives could have flow down effects on other plan provisions.	Allow the submission, subject to appropriate wording. FS25.019
#344	001	Paihia Properties Holdings Corporate Trustee Limited and UP Management	Entire Plan	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. PPHCTL 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.	Establish a centre hierarchy to set a clear policy direction for the larger urban areas within the District and amend provisions and zoning as necessary to implement the hierarchy that achieves a compact urban form.	Support in principle	There are a range of centres in the Far North that fulfil different functions. It is important for the future vitality and sustainability of the various centres that there are appropriate provisions in the Plan to guide development and achieve optimal urban outcomes, including outcomes that support the wider communities.	Amend Plan to provide an appropriate hierarchy of centres. FS25.020
#356	009	Waka Kotahi		Consider adding new objectives: <ul style="list-style-type: none"> to support good urban design including good accessibility for all people between housing, jobs, community services, recreational spaces, including by way of active and public transport where practicable; the provision of a range of zones to meet the demands of the district and support wellbeing; 	Insertion of new objectives to address: <ul style="list-style-type: none"> good urban design, including good accessibility for all people between housing, jobs, community services, recreational spaces, including by way of active and public transport where practicable; and provision for a range of zones to meet expected demand for the district and to support wellbeing. 	Support	KFO supports the intent of the submission to support achieving good urban design and accessibility, subject to appropriate wording.	Allow the submission, subject to appropriate wording. FS25.021
#364	005	Director General of Conservation	Amendment requested	Give effect to the NPS IB	Update the Proposed District Plan to be consistent with the NPSIB exposure draft. Specifically, but not limited to: <ul style="list-style-type: none"> Protect SNAs and identified taonga on Māori lands in line with clause 3.18 of the NPSIB exposure draft. Include objectives, policies, or methods in the PDP for managing the adverse effects of new subdivision, use, and development on highly mobile fauna areas. Incorporate NPSIB Appendices 3 and 4 or like principles into the PDP. Update proposed Policy IB-P4 to require that any biodiversity offset, or biodiversity compensation be in accordance with these principles. Any other amendments that may be necessary or appropriate to address my concerns. 	Support in part, subject to the nature of changes proposed to address the submission	The submission refers to the exposure draft of the NPS-IB, which has been superseded. While some amendments may be appropriate to give effect to the NPS-IB within the scope of the pFNDP and submissions, it may not be possible to fully implement the NPS-IB given the pFNDP and submissions predated the NPS-IB.	Allow the submission in part, subject to appropriate wording. FS25.022
#368	116	Far North District Council	General	Give effect to the NPS HPL	Make amendments where necessary, in instances where the terms “Highly Productive Land” and “Versatile Soils” are used in the PDP and make any other amendments necessary to give effect to the NPS HPL.	Support subject to the nature of the proposed amendments.	KFO supports revisiting the pFNDP to ensure that it appropriately gives effect to the NPS-HPL, including its exceptions.	Allow the submission, subject to appropriate wording. FS25.023
#368	101-114	Far North District Council	General	Stormwater	Add wording to every impermeable coverage rule in the PDP stating that stormwater must be disposed on in accordance with Far North District Engineering Standards April 2022.	Support.	KFO supports the proposal to provide additional clarity by referring to the applicable engineering standards.	Allow the submission. FS25.024, FS25.030, FS25.025, FS25.031, FS25.026, FS25.033

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#368	005	Far North District Council	Ecosystems and Indigenous Biodiversity	The District Plan has to give effect to National Policy Statements.	All amendments necessary to give effect to the National Policy Statement Indigenous Biodiversity (NPS IB).	Support in part, subject to the nature of changes proposed to address the submission	While some amendments may be appropriate to give effect to the NPS-IB within the scope of the pFNDP and submissions, it may not be possible to fully implement the NPS-IB given the pFNDP and submissions predated the NPS-IB.	Allow the submission in part, subject to appropriate wording. FS25.038
Definitions								
#271	003	Our Kerikeri Community Charitable Trust	Definitions	Development Infrastructure: Support the definition of Development Infrastructure noting that the definition of Land Transport includes transport on land by any means and the infrastructure that facilitates it which would include cycling networks.	Retain definition as drafted	Support	The definition as drafted is appropriate.	Allow the submission. FS25.039
#271	005	Our Kerikeri Community Charitable Trust	Definitions	Integrated Transport Planning: This is a term that is used often throughout the PDP but is not defined. The principal of integrated transportation networks is supported, and it is considered useful to have this term defined to ensure that it is clear to plan users what is meant. The definition should include enforce the importance of connectivity, and multi modal transport options.	Include definition for 'Integrated transport network'.	Support	KFO supports the proposal to clarify what is intended by an integrated transport network.	Allow the submission, subject to appropriate wording FS25.040
#359	037	Northland Regional Council	Definitions	Three waters infrastructure	The definition only applies (as drafted) to council owned infrastructure. We would suggest future-proofing this given the three waters reform as these services are likely to be owned and operated by 'three waters water entities' in the medium term (potable, wastewater and stormwater systems). The definition should consider those used in the Water Services Bill and refer to networks available for connection to private property. This definition needs to be considered carefully in light of the rules which then apply, for example CE-P5.	Support	The amendment provides appropriate clarification and future-proofs the definition against likely changes to local government services.	Allow the submission. FS25.041
#368	002	Far North District Council	Definitions	Impermeable surface	Correct the definition to state 20m ² rather than 2m ² .	Support	The submission seeks to correct an obvious error, which is appropriate.	Allow the submission. FS25.042
#91	003	PF Olsen Limited	Definitions	The definition of Highly Productive Land is inconsistent with the definition contained in the National Policy Statement for Highly Productive Land.	Amend the definition to Highly Productive Land to be consistent with the requirements of the National Policy Statement for Highly Productive Land	Support	The amendment seeks to align the definitions of the pFNDP with the NPS-HPL, which is appropriate as it avoids confusion or inconsistency of application of provisions.	Allow the submission subject to appropriate wording. FS25.043
#561	008	Kāinga Ora	Definitions	Multi-unit development can be in the form of detached units and attached units and a separate definition is not required.	Delete definition of multi-unit development.	Support	KFO agrees that multi-unit development can include attached and detached units.	Allow the submission. FS25.044
Support Planned Growth								
#271	001	Our Kerikeri Community	Support planned growth	Support planned growth as this helps ensure efficient and effective infrastructure, and connectivity. While it is acknowledged that there are no current growth	Continue to develop spatial and strategic direction for the District's urban centres and include place holding provisions throughout the plan.	Support	The pFNDP should give effect to and implement strategic documents addressing planned growth.	Allow the submission. FS25.045

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		Charitable Trust		strategies or structure plans, some are in development, and could be completed prior to the PDP being made Operative. To ensure that these strategic documents can be given effect and implemented once approved by Council, provisions and assessment criteria that hold a space for these planning documents should be included.				
Urban form and development								
#356	005 & 009	Waka Kotahi	Urban form and development	Amend objectives to provide more clarity of how it might be implemented.	SD-UFD-01 is unclear consider deleting the objective or amend to provide more clarity and certainty perhaps more in line with NPS-UD Objective 1.	Support in principle	It is imperative that the Plan sets out clear objectives with clear supporting policies directing how the objectives are to be achieved.	Allow the submission, subject to appropriate wording. FS25.046, FS25.047
#561	018	Kāinga Ora	Objectives	Add new objective SD-UFD-05	SD-UFD-05 Enable higher residential intensification in the area within moderate walking distance around Kerikeri Town Centre.	Support in principle	KFO agrees that intensification should be provided for within walkable catchments to town centres.	Allow the submission. FS25.048
District Wide Matters								
#359	005 - 009	Northland Regional Council	Climate Change	We suggest a greater emphasis on response to climate change. There are climate change mitigation and adaptation responses relevant to district planning that could be set out now. We support the greater use of mixed-use zones and enabling greater density in urban centres subject to appropriate requirements for water resilience and minimising risk from natural hazards.	<p>7.3 We would suggest strategic direction on climate change include:</p> <p>a) A clear statement on how the district plan enables the district's communities to respond to climate change (eg. an objective could be framed along the lines of "Far North District communities are prepared for the impacts of climate change and an equitable transition to a low emission economy", and policies could include: "Provide for development patterns that are resilient to climate change impacts" and "Support the inclusion of design features that take into account the impacts of climate change and the need to transition to a low-carbon economy in proposals for land use, subdivision and development").</p> <p>b) Signal that zoning, overlays and controls on subdivision, use and development are used to minimise risk from natural hazards, protect high value resources that enable climate change responses or are particularly vulnerable to predicted impacts (such as indigenous biodiversity, elite soils and renewable energy generation). They also promote development patterns and land uses and associated transport / infrastructure that enable emissions reduction (such as mixed-use zoning, higher residential density in serviced areas, renewable energy generation and special purpose zoning such as horticulture).</p> <p>7.4 We recommend that land use provisions be tested to ensure there are no undue impediments to climate change mitigation (eg. amenity-based rules on 'reflectivity', building height or similar that unduly limit opportunities for small to medium scale solar or wind generation).</p>	Support subject to the nature of changes proposed	KFO supports the intent of providing direction that provides a clear statement of how communities will respond to climate change.	Allow the submission, subject to appropriate wording. FS25.049, FS25.050, FS25.051, FS25.052, FS25.053

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					7.5 We also note the actions set out in the Te Taitokerau Climate Adaptation Strategy. These actions should guide development of climate change provisions within the new district plan. 7.6 Recent updates from the Ministry for the Environment indicate that sea level is rising faster than anticipated. The Proposed Plan should therefore consider the potential for updating of NRC hazard maps and working with NRC to reflect new understanding of the issue.			
#359	010 - 012	Northland Regional Council	Resilient and Reliable Water Supply	Resilient and reliable water supply is another key issue now and in the long term as climate change effects increase. Water resilience is a particular concern for the Far North district, as was highlighted in the 2019/2020 drought that exposed the vulnerability of existing supplies, primarily those that rely on 'run of river' and are highly unreliable during extended dry periods. We suggest this be embedded in the relevant sections of the strategic direction chapter. We note drought is included in the District Wide Matters section on Hazards and Risks but feel the significance of these issues could be more strongly highlighted. We note droughts have been assessed to have economic impact six times higher than floods – this impact will only be compounded where development is enabled without adequate water supply.	We suggest signalling high intensity development will not be enabled unless serviced by a supply network or adequate on-site storage is provided to cater for extended dry spells / droughts.	Support subject to the nature of changes proposed	KFO supports the intent of the submission, subject to appropriate wording being provided.	Allow the submission, subject to appropriate wording. FS25.054, FS25.055, FS25.056
#359	027 - 030	Northland Regional Council	Highly Productive Land	Application of the NPS HPL	We recommend applying a minimum of Rural Production or General Rural zoning to large tracts of highly productive soils, and where appropriate encouraging lifestyle / rural residential development on poorer soils with supporting infrastructure (roading, water supply, waste and stormwater). We recommend objectives and policies in the subdivision section be strengthened to strongly discourage fragmentation of rural land as this can limit the viability of surrounding farming units and lead to high costs to service these developments. This is of particular concern for highly productive soils and should be based on the provisions in the NPS-HPL. The Regional Policy Statement for Northland does not fully reflect the direction in the NPS-HPL with regard to the protection of productive land. Therefore, it is considered appropriate to take direction from the NPS-HPL.	Support in part	KFO supports the intent of amending the pFNDP to implement the NPS-HPL. However, any provisions that are to be more stringent than the NPS-HPL need to be justified. Furthermore, the NPS-HPL provides a range of exceptions, which should be recognised.	Allow the submission in part. FS25.057, FS25.058, FS25.059, FS25.060,
#421	161, 162, 163	Northland Federated Farmers		Federated Farmers supports objectives PA-O1 and PA-O2 as they are currently drafted in the proposed district plan. However, there is a need for an additional	Federated Farmers seeks the following relief:	Support	KFO supports the submission, including the proposed amendment to reflect that there are some areas of public land adjoining waterbodies.	Allow the submission subject to appropriate wording.

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				objective to be included that provides recognition for private property rights as well as the additional impacts public access may also have on the amenity value of selected landscapes and areas. The landowner's private property rights are a key area of focus which needs to be considered within this chapter.	(a) the retention of objectives PA-O1 and PA-O2 as currently drafted with wording to similar effect; and (b) the addition of a new objective PA-O3 that reads as follows: <u>Practical and safe public access to and along the margins of lakes and rivers and the coastal environment is provided in a way that respects private property and does not result in adverse effects on natural character, landscape, indigenous biodiversity, historical heritage, or cultural values.</u> or wording to similar effect; and (c) any consequential amendments required as a result of the relief sought.			FS25.061, FS25.062, FS25.063
Strategic Direction								
#271	006	Our Kerikeri Community Charitable Trust	Strategic Direction	Integrated transport planning is a critical component to ensuring a coordinated response to land use development and good urban design outcomes. As noted earlier, it is considered that this is difficult to implement when strategic and spatial direction is lacking as the opportunity for triggers at development stage is missed and it is sought that place holders are included throughout the plan to hold a place for the development of such documents (noting that the Transport Strategy does not appear to currently spatially identify any future transport networks). Without such guiding documents, it is unclear how the outcome sought by SD-EP-04 will be achieved, particularly given that there are no policies associated with these objectives. Encouraging multi modal transport (e.g. cycling, walking and public transport), as a critical element to social and economic well-being. Accordingly, the following amendment to SD-EP-04 is sought.	People, businesses and places are connected digitally and through <u>multi modal</u> integrated transport network	Support	KFO supports the recognition that the integrated transport network will be multi-modal (i.e., providing for private vehicles, buses, cyclists and pedestrians).	Allow the submission. FS25.064
#271	007	Our Kerikeri Community Charitable Trust	Strategic Direction / Economic and Social Wellbeing / New policy	Without policies, it is difficult to understand how the Strategic Direction is intended to be implemented throughout the plan. With specific regard to integrated transport networks, a policy is sought that provides this direction, and wording suggested.	Insert corresponding policy to SD-EP-04 regarded integrated transport networks: SD-EP-PXX To ensure multi modal integrated transport networks by: a. Requiring Integrated Transport Assessments at the time of subdivision. b. Ensuring that provision for planned integrated transport networks is made at the time of development. c. Funding for integrated multimodal transport networks is identified in the Long Term Plan	Support in part	KFO supports the proposal subject to the following: 1. There will also need to be corresponding rules and supporting assessment criteria. 2. There should be specified triggers for this requirement as a subdivision involving only 1 or 2 additional lots is unlikely to warrant this requirement. 3. There are other methods that should be employed to secure this outcome for smaller scale developments without the need for a full ITA e.g., Council's Subdivision Standards, Structure Plans secured in the Plan through Precincts to give statutory weight for example.	Allow the submission subject to appropriate wording. FS25.065
#271	008	Our Kerikeri Community Charitable Trust	Strategic Direction / Urban Form and Development /	The District urban centers have been ad hocly developed, in most cases resulting in poor urban design outcomes. This chapter provides the first opportunity for a 'top down' approach to ensure that this is not the	Insert an additional objective and policy that acknowledges the importance of urban design in achieving integrated development and good urban form and development outcomes. SD-UFD-OX	Support	KFO supports the proposed new provisions targeted at achieving good urban design outcomes.	Allow the submission subject to appropriate wording. FS25.066

Sub #	Sub Point	Submitter	Theme	Summary	Decision Requested	Further Submission		Decision requested
						Support / oppose	Reasons	
			New Objective and Corresponding Policy	case going forward and that integrated development resulting in good urban design outcomes is achieved. The objective in this chapter does this to an extent, but an additional objective should be included that expressly identifies the importance of urban design in insuring good urban form and development. See suggested wording for new objective and corresponding policy.	Urban growth and development is high quality and responds positively to the local context and outcomes expected for the zone. SD-UFD-PX To manage change in urban environments by ensuring a high level of amenity through quality urban design by: a. Identifying areas where active frontages are required to support a vibrant and pedestrianized environment b. Requiring development in urban centers to show how they will contribute to a connected, distinctive attractive, appropriate, sustainable and safe urban form. c. Ensuring that development responds to local context, including through alignment with relevant spatial or strategic document.			
Transport								
#271	009 & 010	Our Kerikeri Community Charitable Trust	Transport	In general, our group seeks to ensure that Council and Developers are required to ensure that land use and development considers transportation effects beyond the site. That cul-de-sac roads are generally discouraged unless provision has been made for future connectivity, and that multi modal transport planning is encouraged.	Seek changes to provisions within the plan that direct a high level of connectivity, integrated land use and transport planning, and multi modal transport networks. Amend TRAN-O3 as follows: Land use and development planning, and transport planning all modes of transport are integrated so that the to ensure an efficient pattern of land use and transport networks that are transport network is, safe, efficient and well-connected. Or Add new policy that specifically addresses integrated land use and transport planning. Amend TRAN-O5 as follows: The transport network provides for the safe and efficient movement of vehicular, cycle and pedestrian traffic, and that also meets the needs of persons with a disability or limited mobility.	Support in part	KFO supports the intent of the proposed amendments, subject to considering the most appropriate wording.	Allow the submission, subject to appropriate wording. FS25.067, FS25.068
#271	012 & 023	Our Kerikeri Community Charitable Trust	Transport	Support acknowledgment of Twin Coast Trail and future cycling pathways, particularly where they contribute to connectivity. Seek inclusion of multi modal transport options to ensure social and economic wellbeing of our communities, and to respond to climate change. See suggested amended change to better reflect this.	Establish and maintain a transport network that: a. provides safe efficient linkages and connections; b. avoids and mitigates adverse effects on historical, cultural and natural environment values to the extent practicable; c. recognises the different functions and design requirements for each road classification under the most current National Transport Network classification system; d. supports reductions of greenhouse gases from vehicle movements including through implementation or multi modal transport options; e. considers the likely current and future impacts of climate change when new sections of the network are proposed or existing sections upgraded; and	Support	KFO supports the amendments for the reason given in the submission.	Allow the submission. FS25.069, FS25.070

Sub #	Sub Point	Submitter	Theme	Summary	Decision Requested	Further Submission		Decision requested
						Support / oppose	Reasons	
					<p>f. provides for existing and future pedestrian and cycling pathways <u>that are well connected</u>, including the Pou Herenga Tai Twin Coast Cycle Trail.</p> <p>Encourage new land uses <u>and development</u> to support an integrated <u>and well connected</u> and <u>diverse multi modal</u> transport network by:</p> <p>a. <u>Requiring consideration of promoting</u> alternative transport modes <u>at the time of land use and development</u>;</p> <p>b. <u>Ensuring that the construction of new transportation infrastructure aligns with relevant spatial or strategic document</u></p> <p>c. <u>Encouraging</u> the provision of safe and secure parking facilities for bicycles and associated changing or showering facilities for staff;</p> <p>d. <u>Requiring</u> allocation of parking facilities for motorcycles, mobility scooters, car share vehicles, pick up/drop off areas for ride share services and charging stations for electric vehicles; and</p> <p>e. supporting the establishment and operation of accommodation and tourism related activities in close proximity to the Pou Herenga Tai Twin Coast Cycle Trail, provided reverse sensitivity effects can be avoided.</p>			
#271	013	Our Kerikeri Community Charitable Trust	Transport	TRAN-R2 PER -1 allows private accessways where there is a maximum of 8 household equivalents (80 vehicle movements), where this cannot be achieved resource consent is required as a discretionary activity.	Amend TRAN-R2 to clarify that where TRAN-PER 1 cannot be complied, a public road that complies with TRAN-S4 is required to be vested in Council, or Discretionary resource consent required.	Support in part	KFO supports the submission, subject to considering the wording as better environmental outcomes may be achieved by having a tailored regime for determining the best outcome for specific circumstances. The activity status should also change to Restricted Discretionary as the relevant matters for assessment will be restricted to transport connections, safety, amenity, the viability of a public road, engineering construction matters.	Allow the submission in part subject to appropriate wording. FS25.071
#271	017	Our Kerikeri Community Charitable Trust	Transport	The construction of roads should exceed the standards in the Engineering Standards, particularly where required by a spatial/strategic document. Support requirement for Traffic Impact Assessment where a new road is constructed. Cul-de-sacs should be disincentivized as they are widely accepted as presenting bad urban design outcomes, and are currently a favoured position of developers due to the lower costs associated.	Amend to: <ul style="list-style-type: none"> Provide for design that exceeds that required in the Engineering Standards (e.g. provides for separated cyclist network where not otherwise required), particularly where in alignment with a spatial/strategic document. Disincentivize cul-de-sacs, as a minimum in regard to TRAN-S4.2 The following additional requirements should be included: <ul style="list-style-type: none"> ITA with targeted information requirements should be required. Without this, cul-de-sacs are essentially further incentivized as a lower costs option. The cul-de-sac legal width must extend to the boundary of the site to facilitate future connection. 	Support in part	KFO supports the proposal that there are clear standards for the development of roading infrastructure. It is appropriate that there is the opportunity to seek resource consent for departures from standards.	Allow the submission in part subject to appropriate wording. FS25.072

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						Support / oppose	Reasons	Decision requested
#368	018	Far North District Council	Transport	Requirements for road design.	Seeks to add FNDC Engineering Standards April 2022 to matters of discretion.	Support in part	KFO supports the intent of the amendment, subject to appropriate matters of discretion that include alternatives that provide a safe and appropriate transport outcome.	Allow the submission in part. FS25.073
Zoning								
#22	002	Trent Simpkin	Rural Production zoning	Zoning should reflect the existing environment	Rezone land at Waitotara to Rural Living	Support	KFO supports the rezoning of this land so that the zoning reflects the land use pattern. It also appropriately provides a transition from the zoning proposed on the KFO site.	Allow the submission. FS25.074
#51	002	Jeff & Robby Kemp	Rural Production zoning	Contextually there is a discord in zoning.	Rezone land at Waitotara to Rural Residential zone	Support	KFO supports the rezoning of this land so that the zoning reflects the land use pattern. It also appropriately provides a transition from the zoning proposed on the KFO site.	Allow the submission. FS25.075
#271	033	Our Kerikeri Community Charitable Trust	Commercial and Mixed Use Zones - General	In general, it is sought that good urban design outcomes are encouraged in the urban centers throughout the District. However, given that only one commercial zone has been picked from the available options (Mixed Use Zone), this provides limited ability to really target this in a meaningful way. Accordingly, in general more targeted zoning in the urban centers is sought. Further it is considered that the development of urban design guidelines and reference to the guidelines in any Commercial Zone would help to clearly direct good urban design outcomes.	Seek that Council introduce additional commercial and mixed use zones to better manage the larger urban centers (such as Kerikeri) and develop a set of urban design guidelines to be referenced.	Support	KFO supports the proposal to establish different commercial zones to respond to particular issues in particular centres. Subject to appropriate drafting, a more nuanced zone for the Kerikeri town centre may be appropriate.	Allow the submission, subject to appropriate wording. FS25.076
#271	036 & 038	Our Kerikeri Community Charitable Trust	MUZ-P5	Seek the following additions to ensure good urban design outcomes that a requirement to consider alignment with urban design guidelines (see earlier point seeking that Council develops some) be included as a matter in this policy.	Seek the following amendments: Manage land use and subdivision to address the effects of the activity requiring resource consent, including (but not limited to) consideration of the following matters where relevant to the application: a. consistency with the scale, density, design, amenity and character of <u>the surrounding mixed use environment, and with the urban design guidelines</u> ; b. the location, scale and design of buildings or structures, outdoor storage areas, parking and internal roading; c. at zone interfaces: i. any setbacks, fencing, screening or landscaping required to address potential conflicts; ii. any adverse effects on the character and amenity of adjacent zones; d. the adequacy and capacity of available or programmed development infrastructure to accommodate the proposed activity; including: i. opportunities for low impact design principles; ii. management of three waters infrastructure and trade waste; e. managing natural hazards;	Support	KFO supports the concept of achieving good urban design outcomes. However, any urban design guidelines would need to be carefully considered and appropriately drafted.	Allow the submission, subject to appropriate wording. FS25.077, FS25.078

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						Support / oppose	Reasons	
					<p>f. the adequacy of roading infrastructure to service the proposed activity;</p> <p><u>g. alignment with any strategic or spatial document;</u></p> <p><u>h. provisions made to ensure connectivity;</u></p> <p>i. any adverse effects on historic heritage and cultural values, natural features and landscapes or indigenous biodiversity, and</p> <p>j. any historical, spiritual, or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6.</p>			
#331		Ministry of Education – Te Tāhuhu o Te Mātauranga	Zoning changes and urban growth	<p>The Ministry notes that various changes are proposed to the zoning of land throughout the district. Changes in zoning have the potential to result in changes in development and in the population size and demographic of residents throughout the district, which can consequently impact on the capacity of educational facilities. The Ministry acknowledges the changing nature of zoning and development within a district as part of the District Plan process, however, requests that educational facilities are enabled as part of urban growth and development and are considered in any zoning changes made. Council has an obligation under the National Policy Statement for Urban Development 2020 (NPS-UD) to ensure sufficient additional infrastructure (which includes educational facilities) is provided in urban growth and development areas (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular). The Ministry considers that enabling provisions for educational facilities in the relevant zones and relevant policy framework assists in achieving this outcome.</p>	No specific relief is sought in relation to this point.	Support	KFO agrees that Kerikeri is part of an urban environment.	<p>Allow the submission, subject to appropriate wording.</p> <p style="text-align: center;">FS25.128, FS25.129</p>
#359	013 - 022	Northland Regional Council	Zoning	<p>9.3 Enabling further development in areas prone to flooding is at odds with direction in the RPS Policy 7.1.2 (New subdivision and land use within 10 year and 100 year flood hazard areas) and Method 7.1.7 – in particular method 7.1.7(6).</p> <p>9.4 In summary, these RPS provisions seek to avoid an increase in risk and discourage subdivision, built development and storage of hazardous substances in hazard zones – especially where rezoning land to more intensive use in hazard prone areas is proposed. It can also create demand for flood mitigation schemes/works over a comparatively large area which is expensive and can create affordability issues.</p> <p>9.5 Further to the above, any such re-zoning without three waters infrastructure is also an issue in the long term – retrofitting networks to service such sites can be problematic and more costly than establishment at the</p>	We suggest ensuring the extent of the new zoning that provides for intensification avoids areas prone to natural hazards unless the change reduces vulnerability to risk.	Support in principle	KFO further submits that greenfield development is a more appropriate and more cost-effective way of meeting housing demands. Retrofitting networks to service infill development can be problematic and costly, particularly where existing development has already established infrastructure.	<p>Allow submission to the extent that hazard prone areas are correctly identified and mapped and that there are appropriate consent triggers that enable more detailed assessment in appropriate circumstances.</p> <p style="text-align: center;">FS25.079, FS25.080, FS25.081, FS25.082, FS25.083, FS25.084, FS25.085, FS25.086, FS25.087, FS25.088</p>

Sub #	Sub Point	Submitter	Theme	Summary	Decision Requested	Further Submission		Decision requested
						Support / oppose	Reasons	
				'greenfield' stage. This is especially so where existing development has already established on-site services (eg. wastewater disposal and water storage) but would need to pay to connect to new network services. Without access to appropriate servicing there are major limitations on the density and type of urban development which can be accommodated in these zones.				
#364	074 - 076	Director General of Conservation	Amendment requested	The Director-General requests the addition of an objective, policy, and/or rule that acknowledges the potential adverse effects that bright lights can have on indigenous fauna. The additional objective/policy should seek to avoid, minimise/remedy, or mitigate adverse effects from lighting on indigenous fauna. The policy should apply for activities adjacent to or within SNAs.	Include a policy with lighting recommendations in line with the following document, which New Zealand is a party to as part of the United Nations Convention on Migratory Species: National Light Pollution Guidelines for Wildlife Including Marine Turtles, Seabirds and Migratory Shorebirds - DAWE In summary, best practice lighting design incorporates the following design principles: 1. Start with natural darkness and only add light for specific purposes. 2. Use adaptive light controls to manage light timing, intensity and colour. 3. Light only the object or area intended – keep lights close to the ground, directed and shielded to avoid light spill. 4. Use the lowest intensity lighting appropriate for the task. 5. Use non-reflective, dark-coloured surfaces. 6. Use lights with reduced or filtered blue, violet and ultraviolet wavelengths with a correlated colour temperature of 2700K or warmer.	Oppose	The submission is based on overseas research, rather than an assessment of potential effects on indigenous fauna in Northland. No assessment has been provided of the costs of the proposal, nor the potential benefits. There is no justification for including the proposed provisions in the pFNDP.	Disallow the submission FS25.089, FS25.090
#368	006	Far North District Council	Mixed Use	The Plan needs to consider a minimum net internal floor area for residential units in the Mixed Use zone, similar or the same as for the General Residential zone for residential activity (multi-unit development).	Apply an internal floor area.	Support	KFO supports the management of internal floor area to ensure that dwellings in the MUZ are of an appropriate size to provide a quality living environment.	Allow the submission, subject to appropriate wording FS25.091
#559	029	Te Runanga o Ngāti Rēhia	Zoning	Re-zoning without three waters infrastructure is an issue in the long term – retrofitting networks to service such sites can be problematic and more costly than establishment at the 'greenfield' stage. Waipapa is an example of an area that has been re-zoned from rural production to light and heavy industry. Noting there is already existing development there that has already established on-site services (e.g. wastewater disposal and water storage) but would need to pay to connect to new network services. Without access to appropriate servicing there are major limitations on the density and type of urban development which can be accommodated in these zones.	Amend zoning of areas in Waipapa when the necessary three waters infrastructure is in place (inferred).	Support	Zoning can be applied with supporting rules, standards, assessment criteria etc to require connection to reticulated services; or for these services to be provided in conjunction with development.	Allow submission subject to appropriate wording that clarifies zoning with appropriate provisions can be enabled ahead of all infrastructure being in place. FS25.092
#561		Kāinga Ora	Kerikeri Town Centre	Kāinga Ora seek a new Town Centre zone for Kerikeri in recognition of its importance as a growing centre in the Far North. The zone provisions enable buildings of up to 6 storeys (22m maximum height) and also provide for ground floor residential activity except where a pedestrian frontage is identified (aligning with that currently shown on the planning maps, other than where amended in Kaikohe). See Appendices 3 and 5.	That MUZ-01 be retained as notified with the introduction of a Town Centre zone for Kerikeri.	Oppose	KFO supports a more appropriate zoning for Kerikeri town centre than the Mixed Use Zone subject to appropriate provisions that reflect the character and environmental characteristics of Kerikeri. KFO does not support a maximum building height of 22 metres for all of Kerikeri town centre and considers that more fine grained planning should be undertaken to identify locations suitable for higher buildings	Disallow the building height aspect of the submission subject to more detailed / fine grained planning – potentially a Precinct to identify suitable locations for higher buildings. Support other changes subject to wording and changes sought. FS25.130

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						Support / oppose	Reasons	
							to ensure town centre amenity is maintained. This includes wind tunnel and other amenity effects.	
#561		Kāinga Ora	Kerikeri Medium Density Housing zone	Kāinga Ora supports these objectives and policies as they relate to General Residential zoned sites, in particular, as they provide a planning framework to achieve good housing outcomes. However, a Medium Density Residential zone is sought for the walkable catchment around Kerikeri and new objectives, policies and rules related to that zone are sought as discussed further in Appendix 4 and detailed in Appendix 5.	That GRZ-O1, GRZ-O2 and GRZ-O6 be retained as notified in relation to General Residentially zoned sites. New provisions are sought to apply to Medium Density Residentially zoned sites around Kerikeri Town Centre. Refer to Appendix 4 and Appendix 5 below.	oppose	KFO seeks to ensure that quality-built and urban form outcomes are achieved for the Kerikeri town centre and adjoining residential zoned land. To secure these outcomes appropriate objectives, policies, rules – consent triggers, assessment criteria etc are required. Providing for residential intensification also needs to consider the most appropriate and efficient way to provide capacity with reference to the integration of infrastructure with development and creation of well-functioning urban environments.	Disallow. FS25.131, FS25.132, FS25.133
Subdivision								
#356	072 - 092	Waka Kotahi	Subdivision	Objectives, policies, and rules	Various changes sought	Support	KFO supports the amendments for the reasons given in the submission, to the extent that they are consistent with the relief sought in KFO's submission.	Allow the submission in part FS25.113
#368	004	Far North District Council	Subdivision	Correction: The onsite wastewater option for both Mixed Use and Light Industrial zones needs to be removed as they are both 'urban' as defined in the PDP. This was incorrectly applied, the intention of the PDP in urban zoned land is the availability of adequate development infrastructure.	Amend SUB-S1 Mixed Use 2,000m2 onsite wastewater disposal 250m2 reticulated wastewater disposal Light Industrial 2,000m2 onsite wastewater disposal 500m2 reticulated wastewater disposal	Support the proposed changes.	KFO supports the correction as it reflects the underlying intent of the pFNDP.	Allow the submission FS25.114
#368	087	Far North District Council	Subdivision	If a subdivision is not able to connect to a reticulated water system, the way the rule is currently drafted it could be interpreted as requiring that there be a system installed or be provided as a condition of consent (i.e s224(c)) prior to issue of any new title. The intention is that at subdivision it shall be demonstrated that a water supply system can be provided. Redraft more aligned with the standard for wastewater SU B-S5 (2)	Amend SUB-S3 3. Where a connection to Council's reticulated water systems is not available all allotments <u>shall be provided with a means to</u> must provide a water supply system.	Support	KFO supports the amendment, which clarifies the intent of the standard.	Allow the submission FS25.115
#561	045	Kāinga Ora	Subdivision	Amend SUB-O3	Infrastructure is <u>existing and / or</u> planned to service the proposed subdivision and development where: a. there is existing infrastructure connection, infrastructure should be provided in an integrated, efficient, coordinated and future-proofed manner at the time of subdivision; and b. where no existing connection is available infrastructure should be planned and consideration be given to connections with the wider <u>infrastructure network</u> .	Support	KFO supports the amendment because it is appropriate that development can support and enable the provision of infrastructure.	Allow the submission. FS25.116
#561	048	Kāinga Ora	Subdivision	Amend SUB-R5	Delete multi unit and replace with land use.	Support	KFO agrees that it is appropriate to enable subdivision around consented land use activity in general, not just around multi-unit development and that the provision should be extended to the Medium Density Residential zone.	Allow the submission. FS25.117

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						Support / oppose	Reasons	
Planning Maps								
#368	027	Far North District Council	Planning maps	Amend symbology	Amend symbology of Special zones, as well as legend scale, to enable easier differentiation of special zones in the PDP.	Support.	KFO supports the proposal to include greater clarity in the planning maps.	Allow the submission. FS25.118
Earthworks								
#364	072 & 073	Director General of Conservation	Kauri Dieback	The Director-General submits that the earthworks rules and policies should recognise the potential threat posed by Kauri Dieback where it can be easily spread through soil movements.	Ensure earthworks policies and rules allow consideration and management of kauri dieback.	Support	KFO supports the intent of the submission, subject to appropriate wording.	Allow the submission, subject to appropriate drafting FS25.119, FS25.120
#368	084	Far North District Council	Earthworks	The standard does not exclude the forming of an approved driveway or crossing from a legal road or the installation and upgrading of utility connections and infrastructure. It is not the intent of this standard to require consent for these activities.	Amend EW-S6 to include This standard does not apply to a legal road boundary where: i. The earthworks are for the formation of an approved driveway or crossing. ii. The earthworks are for the installation and upgrading of utility connections and infrastructure.	Support.	KFO supports the amendment, which appropriately clarifies the intent of standard EW-S6.	Allow the submission. FS25.121
Natural Character								
#368	007	Far North District Council	Natural character	Technical error. Incorrect reference to one of the points within Standard NATC-S2. NATC-S2 point 1. should reference point 4. not point 5.	Amend NATC-S2 Earthworks or indigenous vegetation clearance Any earthworks or indigenous vegetation on a site within wetland, lake and river margins clearance must: 1 . not exceed a total area of 400m2 for 10 years from the notification of the District Plan, unless a control in 5-4 below applies; 2. not exceed a cut height or fill depth of 1 m; 3. screen exposed faces; and 4. comply with Ecosystems and indigenous biodiversity chapter, NFL-S3 Earthworks or indigenous vegetation clearance and	Support	The correction is appropriate.	Allow the submission FS25.122
Significant Natural Areas and Biodiversity								
#364	002 - 004	Director General of Conservation	Significant Natural Areas	There are no scheduled SNAs within Schedule 4 of the Proposed District Plan. The Director-General is strongly opposed to this decision, which is considered contrary to section 6(c) of the RMA, the objectives and policies of the Regional Policy Statement for Northland, and the NPSIB exposure draft. The Director-General is concerned that the current wording of the subdivision chapter will allow potential SNA sites to be subdivided	Use 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. Include more stringent controls to allow for the consideration and scheduling of SNAs in the subdivision chapter. Due to the lack of scheduled SNAs, review all Restricted	Oppose	The identification of SNA requires current mapping based on ground truthing and ecological assessment.	Disallow. FS25.123, FS25.124, FS25.125

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				with minimal ability to consider the adverse effects of the subdivision on indigenous biodiversity.	Discretionary Activity and Controlled Activity rules and add matters of discretion/control for indigenous biodiversity where not already identified.			
#364	006 & 007	Director General of Conservation	Kiwi conservation	Kiwi conservation is a primary concern of the Director-General and it is particularly important in the Far North District context. Although it is noted that the North Island Kiwi is "Not Threatened", it has only reached this improved conservation status after significant community conservation efforts. These efforts should not go to waste and specific kiwi conservation objectives, policies, and rules should therefore be incorporated into the Proposed District Plan.	Add overlays to identify locations of 'Kiwi present' and 'high-density' kiwi areas. Add provisions to promote pet-free subdivisions in high-density kiwi areas.	Support	KFO supports the intent behind the submission, subject to the Department providing appropriate information to identify areas and appropriate drafting of provisions.	Allow the submission, subject to appropriately identifying areas FS25.126, FS25.127
#421	138 & 139	Northland Federated Farmers	Part 2 – District wide matters – Natural environment values – Ecosystems and indigenous biodiversity – Policies – Rule IB-R1	Federated Farmers supports the inclusion of proposed Schedule 4 in the proposed district plan. The schedule is an appropriate way to recognise the relationship between private landowners and Council and the need to work in partnership to manage Significant Natural Areas.	Retain Rule IB-R1 or wording with similar intent. Retain Schedule 4 Schedule of Significant Natural Areas and develop as proposed.	Support in principle subject to changes	KFO supports in principle the need to identify and protect Significant Natural Areas and to give effect to the NPS Indigenous Biodiversity. However, the process needs to ensure landowners affected have a fair and reasonable opportunity to be involved in decisions affecting their land.	Allow in part subject to appropriate wording and mapping. FS25.134, FS25.135
Natural Hazards								
#359	013	Northland Regional Council	Natural Hazards	Understand a constraints mapping approach has been undertaken to provide underlying guidance as to which are the most appropriate zonings across the district, by excluding those areas where more intensive development and subdivision should be restricted due to constraints such as highly versatile soils, flood and coastal hazards, ONLs and ONFs, historic/cultural heritage sites and areas. The proposed maps appear to rezone a number of areas to provide greater development intensity in areas at risk from natural hazards or that are unserved (e.g. lack three waters infrastructure). Do not support further intensification in flood plains given storm/flood events are predicted to intensify with climate change. Enabling further development in areas prone to flooding is at odds with direction in the RPS Policy 7.1.2 and Method 7.1.7 It appears that some areas with potential flood hazards allow for intensive development. Applying a hazard overlay does not fully address this issue as the underlying zoning can create a development expectation. This is of particular concern for industrial zones with the potential for hazardous chemical storage, but is also relevant to sensitive activities such	Amend the planning maps to ensure that areas prone to natural hazards are not zoned for intensification.	Support	KFO supports the intention of managing zoning to avoid natural hazard risks, subject to appropriate identification of areas at risk and consideration of whether risk can be appropriately managed in other ways.	Allow the submission, subject to appropriate wording FS25.136

Sub #	Sub Point	Submitter	Theme	Summary	Decision Requested	Further Submission		
						Support / oppose	Reasons	Decision requested
				as residential development, education facilities, visitor accommodation etc.				

Attachment B

List of submitters for service

Submitter to be served	Contact details
Our Kerikeri Community Charitable Trust	annika@wwc.co.nz
Kapiro Resients Association	kapiroresidents@protonmail.com
Kapiro Conservation Trust	kapiroconservationtrust@gmail.com
Groundswell NZ	hello@groundswell.org.nz
Vision Kerikeri	visionkerikeri@gmail.com
Carbon Neutral NZ Trust	carbonneutraltrust@gmail.com
Te Rūnanga o Ngāti Rēhia	kipa@ngatirehia.co.nz
Jane E Johnston	agentjane99@gmail.com
Kairos Connection Trust and Habitat for Humanity Northern Region Ltd	chrishirley130@icloud.com conrad.lapoint@habitat.org.nz
Haigh Workman Limited	JohnP@haighworkman.co.nz
Hall Nominees Ltd	sipsiuyee@yahoo.com.au
Te Aupōuri Commercial Development Ltd	ceo@teaupouri.iwi.nz davidb@barker.co.nz makarenad@barker.co.nz
Paihia Properties Holdings Corporate Trustee Limited and UP Management Ltd	RPorter@urbanpartners.co.nz DavidB@barker.co.nz
Waka Kotahi NZ Transport Agency	Sarah.ho@nzta.govt.nz EnvironmentalPlanning@nzta.govt.nz
Director-General of Conservation (Department of Conservation)	asycamore@doc.govt.nz
Far North District Council	greg.wilson@fndc.govt.nz
Northland Regional Council	ingridk@nrc.govt.nz
PF Olsen Ltd	heather.arnold@pfolsen.com
Kāinga Ora Homes and Communities	Brendon.liggett@kaingaora.govt.nz
Northland Federated Farmers of New Zealand	jcCookmunro@fedfarms.org.nz
Trent Simpkin	trent@arcline.co.nz
Jeff and Robby Kemp	114 Waitotara Drive, Kerikeri 0295
Bay of Islands Kerikeri Golf Club	graeme3008@gmail.com
Ministry of Education Te Tāhuhu o Te Mātauranga	Vicky.Hu@beca.com