



## KAIPARA DISTRICT PLAN S42A NATURAL FEATURES AND LANDSCAPES REPORT

Prepared for the Kaipara District Council

4 May 2026

### Introduction

1. My name is Braddyn (Brad) Coombs. I am a Principal Landscape Architect with Isthmus Group Limited (Isthmus). I have been contracted by the Kaipara District Council (KDC) to provide technical landscape expert advice on the Natural Features and Landscapes Chapter of the Proposed Kaipara District Plan (PDP).
2. I have a Bachelor of Horticulture from Massey University (1996) and a Bachelor of Landscape Architecture (with honours) from Lincoln University (1997). I have almost 30 years' experience working mainly in the areas of landscape assessment and resource management throughout Aotearoa New Zealand and in the UK. I am a Registered Landscape Architect with the New Zealand Institute of Landscape Architects Tuia Pito Ora (NZILA) as well as being an elected Fellow and a past President of the Institute.
3. Of relevance to providing landscape advice for the PDP I have undertaken several projects in the Northland Region and within the Kaipara District and I am familiar with the landscapes of the District. I undertook a site visit through the District by car on 20 and 21 April to visit areas where submissions are relevant to.
4. I have prepared or supervised the preparation of several District-scale landscape assessments for the purposes of identifying and managing outstanding natural features and landscapes and areas of outstanding natural character within the coastal environment. I have assisted several industry-based clients<sup>1</sup> in responding to District and Regional plan reviews and have contributed landscape advice to s42A Reports.
5. I am authorised by KDC to prepare this report to provide landscape advice to the author of the report prepared under s42A of the Resource Management Act (**RMA**) to assist the PDP Hearings Panel. The purpose of this report is to provide advice to the author of the s42A report in relation to submissions that have been received on the natural features and landscapes chapters of the PDP. The s42A Report has been prepared by Ben Lee. This report includes my recommendations on matters raised in submissions.
6. I am the author of this report. The data, information, facts, and assumptions I have considered in forming my opinions are set out in my evidence. Where I have set out

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<sup>1</sup> For example, electricity generation and transmission companies and aquaculture clients.

opinions in my evidence, I have given reasons for those opinions. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

7. While this is not a hearing held by the Environment Court, I confirm that I have read the Code of Conduct for Expert Witness in the Environment Court Practice Note 2023 and that I have complied with it when preparing this report. Other than when I state that I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
8. I confirm that I have no real or perceived conflict of interest in relation to the Natural Features and Landscapes (NFL) chapter.

### **Purpose and Report Structure**

9. The purpose of this report is to provide technical natural feature and landscape advice to the s42A Report author. The purpose is not to assess or reassess natural features and landscapes, other than where submitters have made specific requests for changes. The scope of this report is limited to the scope as set out in section 2 of the s42A Report and the consideration of the submissions relating to:
  - a. The NFL chapter
  - b. Schedule 4 – Outstanding Natural Features
  - c. Schedule 5 – Outstanding Landscapes
  - d. Mapped ONL and ONF
10. This report is structured to follow the topics and the order of the NFL s42A Report, to support the consideration and response to submissions. The statutory context for the consideration of submissions on the NFL chapter and maps has been set out in the NFL s42A Report. I rely on the s42A authors summary and consideration of the statutory context.

### **Topic 2: ONL and ONF Mapping**

11. The PDP identifies ONFs and ONLs through mapped overlays supported by the attributes and values set out in schedules 4 and 5. Schedules describe the mapped overlay areas and the attributes and values that have led to the ONF or ONL being identified. The mapped overlay are the spatial basis for the application of the NFL chapter provisions.
12. Several submitters seek refinements to ONL boundaries to better reflect the RPS criteria and associated assessment worksheets. Several submissions request updates to the information contained in Schedules 4 and 5, including replacing references to earlier

technical reports with more recent methodology documents. Some submitters also sought the removal of specific areas — such as plantation forestry — from ONL overlays.

13. No submissions sought changes to ONF maps.
14. The RPS directs the requirement to include ONL and ONFL overlays in the PDP. The RPS includes maps of ONL and ONF for the Region along with criteria to assess and identify them. Detailed assessment worksheets and a methodology report supports the regional ONL and ONF maps. The RPS directs the PDP to adopt the RPS mapped ONL with the ability to refine them where supported by the RPS criteria.
15. Before the RPS was developed, KDC commissioned an ONL assessment for the district— *Kaipara District Plan Review: Landscape Technical Report* (November 2010). The ONL maps from this assessment were subsequently incorporated into the Operative District Plan (ODP)<sup>2</sup>. The ONL mapping and assessment undertaken for the RPS refined the 2010 mapping and reassessed each landscape unit using the RPS criteria. This work resulted in the *Outstanding Natural Features and Landscapes – Mapping Methodology Report* (February 2014), mapped ONL and the accompanying worksheets.
16. The s42A Report recommends updating the links in the PDP from the earlier 2010 Landscape Report to the updated and more refined 2014 Landscape Report and maps. I support updating the references and links to the more complete and up to date 2014 Landscape Report and maps as requested in the submissions and recommended in the s42A Report.
17. Several submissions request changes to the mapping of ONLs. The following table is my assessment of the submissions on the ONL maps and any recommended changes:

Request	Assessment
<p>Amend ONL8 (Maungaru Range) to exclude areas that do not exhibit ONL characteristics.</p> <p>PF Olsen [73.3]</p>	<p>The Maungaru Range is a conspicuous range of hills, rising from approximately 100m asl to over 450m asl at its' highest points, with a mosaic of indigenous vegetation, commercial plantation forest and pastoral landcover.</p> <p>The submission requests that the boundaries of ONL8 are modified to exclude areas that are in commercial forestry or pasture as they no longer meet the RPS criteria for ONLs. Mapping examples are provided in the submission where commercial plantation forests and pasture are within the mapped ONL8 boundary.</p> <p>The submission points out the changes to landcover since the ground truthing of the delineation of ONL boundaries in 2019. This highlights the inherent</p>

<sup>2</sup> With one exception – the addition of an ONL encompassing the hill in behind the surf lifesaving club at Mangawhai Heads. This is shown in Appendix E of the s42A Report.

Request	Assessment
	<p>difficulty in PDP overlays keeping pace with the speed of commercial afforestation, in particular.</p> <p>Areas of the Maungaru Range that have been converted to commercial forestry or pasture no longer meet the RPS criteria for ONLs, specifically in relation to natural science values, aesthetic values and Expressiveness and associative values.</p> <p>It is recommended that the boundaries of ONL8 are modified to exclude such commercial forestry and pastoral areas.</p>
<p>Amend ONL9 (Tangihua Range) to exclude areas that do not exhibit ONL characteristics.</p> <p>PF Olsen [73.2]</p>	<p>The Tangihua Range is a broad conspicuous range of hills, rising from approximately 100m asl to over 600m asl at its' highest points, with predominantly indigenous vegetation cover, but including commercial plantation forest and pastoral landcover in some places. The Tangihua Range includes a series of access tracks and huts that provide recreational access.</p> <p>The submission requests that the boundaries of ONL9 are modified to exclude areas that are in commercial forestry or pasture as they no longer meet the RPS criteria for ONLs. Mapping examples are provided in the submission where commercial plantation forests and pasture are within the mapped ONL9 boundary.</p> <p>The submission points out the changes to landcover since the ground truthing of the delineation of ONL boundaries in 2019. This highlights the inherent difficulty in PDP overlays keeping pace with the speed of commercial afforestation, in particular.</p> <p>Areas of the Tangihua Range that have been converted to commercial forestry or pasture no longer meet the RPS criteria for ONLs, specifically in relation to natural science values, aesthetic values and Expressiveness and associative values.</p> <p>It is recommended that the boundaries of ONL9 are modified to exclude such commercial forestry and pastoral areas.</p>
<p>Amend ONL23 (North Head Coast and Western Dune Lakes) to exclude areas that do not exhibit ONL characteristics.</p> <p>PF Olsen [73.1]</p>	<p>The North Head Coast and Western Dune Lakes ONL23 are a broad coastal area including an exposed coastal beach (Ripiro Beach), with high natural dunes and dune lakes. The dunes and dune lakes have a predominantly indigenous vegetation cover with high natural values. The beach is accessible to the public with walking and vehicle access popular.</p>

Request	Assessment
	<p>The submission requests that the boundaries of ONL23 are modified to exclude a specific area that is in pasture as the area no longer meets the RPS criteria for ONLs. A mapping example is provided in the submission where pasture is within the mapped ONL23 boundary.</p> <p>The submission points out the changes to landcover since the ground truthing of the delineation of ONL boundaries in 2019. This highlights the inherent difficulty in PDP overlays keeping pace with the speed of commercial afforestation, in particular.</p> <p>The area of ONL23 that has been converted to pasture no longer meets the RPS criteria for ONLs, specifically in relation to natural science values, aesthetic values and Expressiveness and associative values. As a result the area has a reduced level of naturalness and is modified to the extent that it would be inconsistent with the values of an ONL.</p> <p>The specific area of pasture has been excluded on the RPS ONL maps.</p> <p>It is recommended that the boundary of ONL23 is modified to exclude the identified pastoral area in the PF Olsen submission.</p>
<p>Amend the extent of the ONL15 (Bald Rock / Pukepohatu) to only the upper (more visually prominent) parts of Bald Rock such as the western side and above a certain height on the eastern side.</p> <p>Coatstone Limited [S262.2]</p>	<p>The submission opposes the identification of the majority of ONL15 (Bald Rock / Pukepohatu) and seeks that the boundaries of the ONL are amended to better enable the resumption of quarrying activities on the eastern side of the land.</p> <p>ONL15 is identified as an ONL based on its' natural science, aesthetic and experiential values across a wider area that supports and surrounds the identification of the smaller ONF within the ONL boundary. The criteria for the assessment of the ONL values scored highly for ONL15 within the RPS assessment sheet. The lower slopes of the Bald Rock landform, including a contiguous cover of indigenous vegetation and the bold landform specifically contribute to the identification of the ONL.</p> <p>The submission does not provide any specific detail as to why ONL15 does not meet the threshold for being identified as an ONL using the RPS criteria, but justifies the proposed changes to the boundary of ONL15 through the request to allow for further quarrying on the submitters' property. The scale at which ONLs are mapped for Regional and District plans inevitably means that some historic features or infrastructure (such as quarries or roads) may be included within the</p>

Request	Assessment
	<p>ONLs, however this does not reduce the overall value of the identified area.</p> <p>It is recommended that the boundaries of ONL15 are not modified to accommodate quarrying on the site.</p>
<p>Amend the extent of the ONL overlay from the following properties at Bream Tail so that it accurately follows characteristics and features according to the Landscape Assessment Criteria of the Regional Policy Statement:</p> <ol style="list-style-type: none"> <li>1. 15 Tuaraki Road, Mangawhai (LOT 6 DP 400385); and</li> <li>2. 17 Tuaraki Road, Mangawhai (LOT 5 DP 400385).</li> </ol> <p>Daytona Trust [S263.58], Bream Tail Residents Association Incorporated – [300.75] and Tappenden Holdings Limited [289.59]</p>	<p>The Bream Trail Coastal Headland ONL has been identified and assessed using the RPS criteria including natural science, aesthetic and experiential values. The ONL scored highly on almost all criteria and is in the sensitive coastal environment.</p> <p>The scale at which ONLs are mapped for Regional and District plans inevitably means that some historic features or infrastructure (such as houses or roads or more localised changes in vegetation cover) may be included within the ONLs, however this does not reduce the overall value of the identified area.</p> <p>The Bream Trail Headland ONL covers a broad area and includes high landscape values, as identified using the RPS criteria. At a property specific scale changes to boundaries of ONLs is problematic as the scale of mapping is too fine to consider such mapping changes across the entire district. The ONL boundary is generally identified using a combination of topography and vegetation cover, which encapsulate the values as identified in the RPS landscape worksheets.</p> <p>It is recommended that the boundary of the Bream Trail Headland ONL is not adjusted to exclude property specific areas at 15 and 17 Tuaraki Road, Mangawhai.</p>
<p>Remove all commercial forestry from the ONL overlay.</p> <p>Manulife Forest Management NZ Ltd [158.12]</p>	<p>The submission seeks the blanket removal of all commercial forestry from ONL areas, or that forestry or that commercial forestry activities within ONLs be a permitted activity. The submission is broad and does not identify the specific areas of commercial that should be removed from ONLs across the District. The Environment Court has confirmed that landscapes covered with commercial plantation forest and/or pasture can meet the threshold of being an ONL in an Aotearoa New Zealand context.</p> <p>The exclusion of all commercial forestry areas from ONLs is too broad an outcome to be able to be applied at a district scale, without more specific guidance or assessment of the areas where ONL values have been compromised by the forest activity.</p> <p>It is recommended that ONL boundaries are not modified to exclude all commercial forestry or that the</p>

Request	Assessment
	RPS maps are adopted where plantation forest has been excluded in the updated maps.
Amend the description of ONL1 (Waipoua Forest) to include the Waipoua River as part of the significance of the landscape and site.  DOC [304.122]	I support the recommendation which is set out in the s42A report:  I am recommending that the ONL descriptions in Schedule 5 be deleted and instead replaced with links to the relevant mapping worksheets which provide a greater level of detail than the current descriptions (I address this under Topic 2). The worksheet includes the following <i>“The Waipoua River, contained within the area, is the most pristine full catchment river system in Northland”</i> .

**Table 1: Assessment of ONL map submissions**

18. For the mapping boundary changes requested by PF Olsens. I have interrogated the boundary line differences between the ONL maps in the Operative District Plan (Nov 2013) and the ONL maps in the NRC RPS (May 2016). There are some relatively subtle, but important differences in those maps. I have attached those maps in **Appendix B**.
19. For ONL8 Maungaru Range and ONL9 Tangihua Range, as discussed in the table above, there do not appear to be any differences in the ONL boundary on the maps between the Operative DP and the RPS maps. Further work and mapping guidance will need to be provided by PF Olsen to satisfy their mapping change request. For ONL23, the area of pasture that PF Olsen requested be removed has been changed in the RPS maps and therefore adopting those updated maps will satisfy that request. See **Appendix B**.

### **Topic 3: Overview**

20. Submissions on the overview section seek a range of amendments, including requests to strengthen the description of sensitivity to development, adjust references to supporting material, or emphasise particular components of ONL or ONF values. Some submitters seek additional detail, while others request clarifications to avoid misinterpretation.
21. I have read the recommended changes to the wording of the overview section in the s42A Report and I agree with those changes which are largely clarifications to the wording and references to assessment methodologies.

### **Topic 4: Objectives**

22. The submissions on the two NFL Chapter objectives are analysed in the s42A report. The s242A Report has suggested a minor wording edit to NFL-01 which I have reviewed and NFL-02 is recommended to be retained as notified. I support those recommendations.

**Topic 5: Policies**

23. The s42A Report provides detailed analysis of the submissions and requests in relation to the NFL Policies. Most of the submissions recommend specific wording changes. I have read through that analysis and the recommendations for changes or confirmation of the notified versions of the policies (some recommended changes are adopted in the s42A Report and others are not). I agree with the recommendations in the s42A Report.

**Topic 6: Rules**

24. Section 8 of the s42A Report provides analysis of the submissions on the Rules contained in the notified NFL chapter. I have reviewed the analysis and the suggested wording edits and I agree with the recommendations.
25. The s42A Report author has requested specific advice from me on the Permitted Activity thresholds for buildings and structures (gross floor area), earthworks (area per year / site) and indigenous vegetation clearance (area per year / site) within ONFs and ONLs. The thresholds are set out in the table below, which is reproduced from the s42A Report. For comparison and consistency, thresholds are also considered for ONFs and ONLs within the coastal environment and areas of outstanding and high natural character in the coastal environment, noting the relative sensitivity of the overlays.

### Permitted activity thresholds matrix

Key	
	Avoid adverse effects / discrete areas
	Avoid adverse effects / larger areas
	Avoid significant adverse effects / discrete areas

#### Notes:

- Figures in black = PDP as notified
- **Figures in blue** = recommended in s42A reports (NFL and Natural Character, Coastal Environment TBC)
- Some figures are expressed in the PDP and/or s42A recommendations as 10-year totals but have been presented in the matrix as per 1-year equivalents for ease of comparison.
- **ONC** = Outstanding natural character, **ONF** = Outstanding natural features, **ONL** = Outstanding natural landscapes, **HNC** = High natural character, **CE** = Coastal environment

	'Avoid adverse effects'			'Avoid significant effects'				
	<b>ONC (CE)</b>	<b>ONF (CE)</b>	<b>ONL (CE)</b>	<b>HNC (CE)</b>	<b>ONF (Not CE)</b>	<b>Freshwater margins</b>	<b>ONL (not CE)</b>	<b>CE other</b>
<b>Buildings and structures</b> (gross floor area)	0m <sup>2</sup> TBC	0m <sup>2</sup> 50m <sup>2</sup> in category 'A' and 'D' 25m <sup>2</sup> in ONF category B, C, and E	0m <sup>2</sup> 50m <sup>2</sup>	50m <sup>2</sup> TBC	150m <sup>2</sup> (residential unit) 100m <sup>2</sup> (accessory building) 100m <sup>2</sup> in ONF category 'A' and 'D' 25m <sup>2</sup> in ONF category B, C, and E	300m <sup>2</sup> 100m <sup>2</sup> / – specified purposes 50m <sup>2</sup> /yr - default	150m <sup>2</sup> (residential unit) 100m <sup>2</sup> (accessory building) 100m <sup>2</sup>	300m <sup>2</sup> TBC
<b>Earthworks</b> (volume per year / site)	0m <sup>3</sup> TBC	0m <sup>3</sup> 50m <sup>3</sup> in category A and D 0m <sup>3</sup> in category B, C, and E	0m <sup>3</sup> 50m <sup>3</sup>	25m <sup>3</sup> TBC	150m <sup>3</sup> 150m <sup>3</sup> in category 'A' and 'D' 5m <sup>3</sup> in ONF category B, C, and E	50m <sup>3</sup> 100m <sup>3</sup> - specified purposes 50m <sup>3</sup> - default	150m <sup>3</sup> 150m <sup>3</sup>	50m <sup>3</sup> TBC
<b>Indigenous vegetation clearance</b> (area per year / site)	0m <sup>2</sup> TBC	N/A	0m <sup>2</sup> 50m <sup>2</sup>	15m <sup>2</sup> TBC	NA	50m <sup>2</sup> 50m <sup>2</sup> – specified purposes 25m <sup>2</sup> -default	150m <sup>2</sup> 150m <sup>2</sup>	50m <sup>2</sup> TBC

Table 2: Permitted activity thresholds matrix

26. I have reviewed the recommendations in the table above and have discussed the rationale for setting building and structure footprints, earthworks and indigenous clearance vegetation thresholds for permitted activities with the s42A author. In my opinion the recommended permitted activity thresholds in the table above are appropriate for the following reasons:

- a) ONF and ONL values in the CE are more sensitive to change than ONF and ONL values outside of the CE due to the relationship with the dynamic interface and relationship between the land and the sea.
  - b) Very limited development potential is provided for in the most sensitive ONF and ONL overlays;
  - c) The thresholds are graduated, allowing minimal permitted development potential in the most sensitive overlays (ONC, ONF and ONL within the CE), graduating to more permissive potential in the less sensitive overlays;
  - d) The scale of permitted activity thresholds would not adversely affect the **values** of the identified ONFs and ONLs to an unacceptable level. The more sensitive CE ONF and ONL environments are where the most restrictive development potential is permitted;
  - e) The scale of ONFs and ONLs can accommodate limited development potential with effects that are limited to an acceptable level; and
  - f) Activities that exceed these thresholds would be more appropriately considered through a resource consent process to also consider the specific context of the ONF or ONL, the scale and nature of the activity and any mitigation options.
27. The S42A Report recommends amendments to rule NFL-R2 makes new buildings in ONL and ONF a controlled activity where it is on a building platform approved through (generally) subdivision consent where natural feature and/or landscape effects were considered (as relevant) and the proposed buildings falls within the effects envelope anticipated by the subdivision consent. This approach maintains Council's ability to manage design details while giving landowners certainty that consent will be granted.
28. The draft wording of the rule is:

**3. Activity status when compliance not achieved with NFL-R2.1: Controlled**

**Where:**

a. The building is a residential unit or a minor residential unit on a defined building platform, where the building platform has been identified through an expert landscape assessment and approved as part of an existing subdivision consent.

**4. The matters of control:**

a. The location, scale and design of buildings, and associated accessways and infrastructure, having regard to their visual prominence;

b. The means of integrating the building, structure or activity into the landscape, including through planting;

*c. The height of retaining walls, their colour and whether planting is necessary to mitigate their visual effects; and*

*d. Measures to mitigate adverse effects on the characteristics, qualities and values that make ONL and ONF outstanding.*

29. The proposed rule is specific to an existing subdivision with a nominated building platform where effects on ONL and ONF have been adequately addressed at the subdivision consent stage. Therefore the effects of a new dwelling are anticipated by the granting of subdivision consent. The key enabling consideration for the Controlled Activity status is the anticipation of the effects of a building on the building platform(s) at the subdivision consent stage.
30. The matters of control – location, scale and design of buildings and associated access, integration of building, structure or activity, including with planting, height, colour and vegetation screening of retaining walls and measures to mitigate effects on the ONL and ONF cover the suite of typical effects and mitigation considerations that the Council can use to control the effects of the building, structure or activity on the ONF or ONL. Some aspects of the matters of control include subjective design considerations that may require further assessment and consideration by a design professional, such as a landscape architect or architect, for the applicant and potentially for the Council.
31. In my opinion these matters of control are appropriate to the ONF or ONL would provide Council with sufficient control to manage the effects of the buildings which are already anticipated.
32. Federated Farmers [136.86 and 136.87] requested that vegetation clearance and earthworks in freshwater margins and ONL associated with permitted new buildings and structures is also permitted. The relevant rules are NFL-R3 and NFL-R4.
33. Providing for the clearance of indigenous vegetation which is associated with permitted new buildings and structures extends the effects of the buildings and structures to a greater area which is not restricted in size to the activity itself, that is, the indigenous vegetation clearance could be much larger than the footprint of the building activity itself. Indigenous vegetation clearance and earthworks is a different issue to buildings and structures and can have wider effects on ONF and ONL values. The two issues should not be conflated. Vegetation clearance should therefore be assessed and considered separately and not tied to the activity status of a building or structure. Freshwater margins are particularly sensitive to vegetation clearance, particularly in relation to the ecological integrity and function of the freshwater environment.
34. I do not support making vegetation clearance and earthworks in freshwater margins and ONL associated with permitted new buildings a permitted activity.
35. I have reviewed the recommendations of the s42A Report author on the submitter requested changes to the scope and scale of activities permitted under rules NFL-R1 – R5 and concur with the authors recommendations

## Topic 7: Standards

36. The s42A Report has provided analysis of the submissions on the Standards contained in the notified NFL chapter in section 9. I have reviewed the analysis and the suggested wording edits, and I agree with the recommendations.
37. The s42A Report author has requested specific advice from me on the Daytona Trust [263.26] submission which has requested exceptions to the height standard of 5.5m above ground level under NFL-S1 – Building and Structure Height:
- a. Chimney structures not exceeding 1.2m in width and 1m in height on any elevation.
  - b. Architectural features (e.g. finials, Spires) that do not exceed 1m in height.
  - c. Solar and water heating components provided these do not exceed the height by more than 0.5m on any elevation.
  - d. Satellite dishes and aerials that do not exceed 1m in height and/or diameter on any elevation
38. It is common for exceptions to be provided to height standards for buildings and structures to allow some articulation for practical considerations, such as chimneys and satellite dishes and solar panels. In my opinion the exceptions provided are appropriate, apart from b) allowing for architectural features that do not exceed 1m in height, for the following reasons:
- a) Chimneys, solar and water heating components and satellite dishes and aerials are functional auxiliary components of a building or structure that cannot necessarily be kept within the overall height standards of the building or structure, without compromising its' function and form;
  - b) Small scale features, as listed above in a) provide additional articulation to the room line of a building or structure, but do not necessarily create any additional effects on ONFs or ONLs;
  - c) There is no specific limit proposed on the maximum area of an architectural feature, which would effectively extend the 5.5m above ground level height standard to 6.5m; and
  - d) Architectural features can be designed within an overall height standard of 5.5m above ground level without the requirement for a specific exemption.
39. Chorus [26.69] has requested the following height standard exceptions in NFL-S1:
1. Antennas attached to existing buildings not exceeding the highest point of the roof by more than 5m; and

2. Telecommunications poles and attached antennas in formed roads not exceeding 20m in height and a diameter including all antennas of 1.2m.
40. The provision of exceptions for limited scale antennas and masts is appropriate as the antenna exception is associated with an existing building and will therefore be a relatively small incidental addition to the building. It is common for antenna to be attached to buildings or structures, in preference to the requirement for a new mast to support an antenna. The telecommunication pole exception is specific to the location within formed roads, which also commonly accommodate telecommunication poles and electricity transmission poles.
41. In my opinion the exceptions for antennas and masts proposed by Chorus are appropriate given the connection to existing buildings or the location within a formed road corridor.
42. The s42A Author has also requested specific advice from me on the inclusion of a colour standard for buildings and structures within ONLs and ONFs. Incorporating a colour standard for buildings and structures within sensitive landscape areas is common by reference to a colour chart with Groups of colours or by a reflectivity percentage restriction which can be used for a comparison. In my opinion the colour standard recommended for inclusion in the Proposed Far North District Plan (the BS5252 colour chart) would be appropriate and would provide some regional consistency – refer to Appendix A attached to this report.
43. The colour reflectance restriction is somewhat of a standard for buildings and structures in sensitive landscapes, with a general colour reflectance value of less than 35% and a roof reflectance values of less than 30%. The reason for the darker roof colour is that roofs have a lower angle of incidence to the sun and therefore reflect more light, appearing lighter in colour. Note that some of the colours in Groups A, B and C of the BS5252 colour chart do not meet the reflectance value restrictions so those that do meet the restriction are a subset of the colours on the chart. Compliance with the reflectance values is measured by a visual comparison with the colour chart. Commercial paint manufacturers generally provide reflectance values for their paints.
44. The use of natural buildings materials is an appropriate inclusion as an alternative to the painted surface standard, although a colour comparison should be incorporated so that brightly coloured natural materials, for example, white coloured lime plaster would not meet the reflectance percentage test. Therefore natural materials should also be subject to the colour reflectance restriction.
45. Horizon Surveying & Land Development [315.36] have requested that NFL-S3 is amended to limit colours and tones to a neutral palette (e.g., browns, greys, deep blues, deep greens) specifications for lighting restrictions such as utilising downlights or light covers. The restrictions of the use of colours is covered by the colour standard above, with reference to the BS5252 colour chart and the restriction to groups A, B and C. See **Appendix A.**

46. The use of downlights or light covers is generally included to limit light spill and ensure that light is focussed on the ground, where it is required. The inclusion of references to downlights or covers is appropriate in an ONF or ONL environment. I support the inclusion of a reference to the use of downlights or light covers. I recommend the following wording for a lighting restriction standard in ONF and ONL:

- a. all exterior lighting shall be directed downward and away from the adjacent sites and roads;
- b. no activity on any site shall result in greater than a 3.0 lux spill (horizontal or vertical) of lights onto any other site measured at any point inside the boundary of the other site.

Brad Coombs  
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Isthmus  
4 May 2026

**Appendix A: BS5252 Colour Charts Groups A, B and C.**

## BS 5252 COLOURS WITH LOW REFLETANCE VALUES

The BS 5252 colour chart framework groups colours based on their visual attributes of hue, greyness and weight. The complete colour chart is shown on the following pages.

**Hue** is the first two digits of the colour code used in the table below. It is the attribute of redness, yellowness, blueness etc of a colour. The framework has 12 hue groups in spectral sequence as follows:

00 neutral	14 green
02 red-purple	16 blue-green
04 red	18 blue
06 yellow-red	20 purple-blue
08 yellow-red	22 violet
10 yellow	24 purple
12 green-yellow	

**Greyness** is indicated by the middle letter in the colour code below. It is the estimated grey content of colours. The framework divides colours into five groups, denoted by letters A to E, representing diminishing greyness as follows:

<b>Group A</b> Grey	<b>Group D</b> nearly clear
<b>Group B</b> nearly grey	<b>Group E</b> clear
<b>Group C</b> grey/clear	

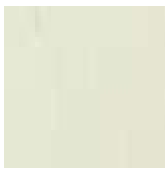
The table below includes only those colours from greyness groups A, B and C which also have a reflectance value of 30% or less. Colours in Groups D and E appear bright in the landscape and are thus not permitted in sensitive locations.

CODE	RV%	CODE	RV%	CODE	RV%
00 A 07	30	04 B 21	30	02 C 37	20
00 A 09	20	04 B 23	20	02 C 39	6
00 A 11	12	04 B 25	16	02 C 40	2
00 A 13	6	04 B 27	9	04 C 37	20
02 A 07	30	04 B 29	3	04 C 39	6
02 A 11	18	08 B 21	27	04 C 40	2
06 A 07	30	08 B 23	19	06 C 37	20
06 A 11	12	08 B 25	10	06 C 39	6
08 A 14	2	08 B 27	8	06 C 40	2
10 A 07	27	08 B 29	7	08 C 37	20
10 A 09	20	10 B 21	30	08 C 39	6
10 A 11	12	10 B 23	22	08 C 40	2
16 A 07	30	10 B 25	18	10 C 37	20
16 A 11	20	10 B 27	8	10 C 39	6
18 A 14	7	10 B 29	3	12 C 37	20
		12 B 23	20	12 C 39	8
		12 B 25	12	12 C 40	5
		12 B 27	8	14 C 37	22
		12 B 29	2	14 C 39	9
		18 B 21	30	14 C 40	5
		18 B 23	20	16 C 37	22
		18 B 25	13	16 C 39	7
		18 B 27	6	16 C 40	4
		18 B 29	7	18 C 37	20
		22 B 21	30	18 C 39	7
		22 B 23	20	18 C 40	4
		22 B 25	12	20 C 37	22
		22 B 27	6	20 C 39	10
		22 B 29	3	20 C 40	7
				22 C 37	20
				22 C 39	6
				22 C 40	2
				24 C 37	20
				24 C 39	6
				24 C 40	2

# BS5252 - COLOUR CHART

The colours shown below should be used as a guide only due to variations in monitor colour calibration.

					
00A01	00A03	00A05	00A07	00A09	00A11
					
00A13	02A03	02A07	02A11	06A03	06A07
					
06A11	08A14	10A01	10A03	10A05	10A07
					
10A09	10A11	16A03	16A07	16A11	18A14
					
04B15	04B17	04B19	04B21	04B23	04B25
					
04B27	04B29	08B15	08B17	08B19	08B21
					
08B23	08B25	08B27	08B29	10B15	10B17
					
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12B15



12B17



12B19



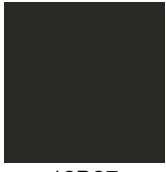
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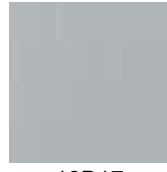
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18B15



18B17



18B19



18B21



18B23



18B25



18B27



18B29



22B15



22B17



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22B23



22B25



22B27



22B29



02C33



02C35



02C37



02C39



02C40



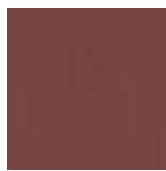
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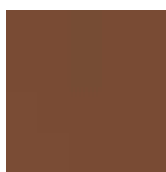
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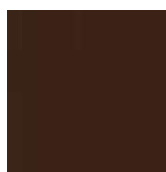
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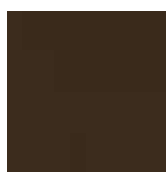
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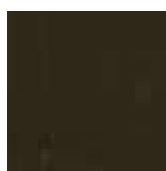
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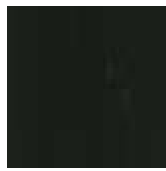
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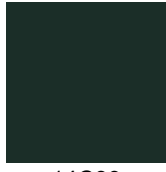
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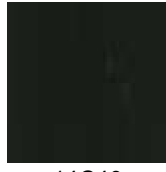
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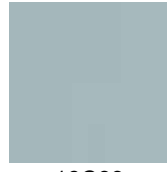
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16C39



16C40



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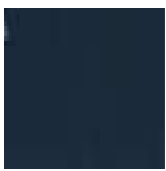
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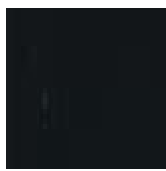
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18C37



18C39



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20C33



20C35



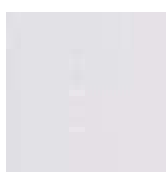
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20C39



20C40



22C31



22C33



22C35



22C37



22C39



22C40



24C33



24C35



24C37



24C39



24C40



02D41



02D43



02D44



02D45



04D41



04D43



04D44



04D45



06D41



06D43



06D44



06D45



08D41



08D43



08D44



08D45



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12D41



12D43



12D44



12D45



14D41



14D43



14D44



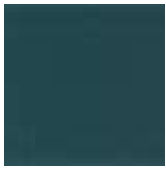
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16D41



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16D44



16D45



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18D44



18D45



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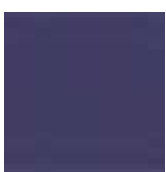
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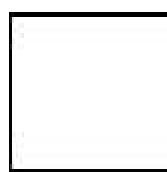
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00E53



00E55



02E53



02E56



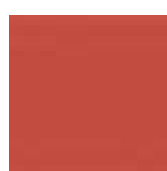
02E58



04E49



04E50



04E51



04E53



04E55



04E56



04E58



06E50



06E51



06E53



06E55



06E56



08E49



08E51



08E53



08E55



08E56



10E49



10E50



10E51



10E53



10E55



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14E56



14E58



16E50



16E53



16E56



18E49



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20E56



22E53



22E58



24E50



24E53

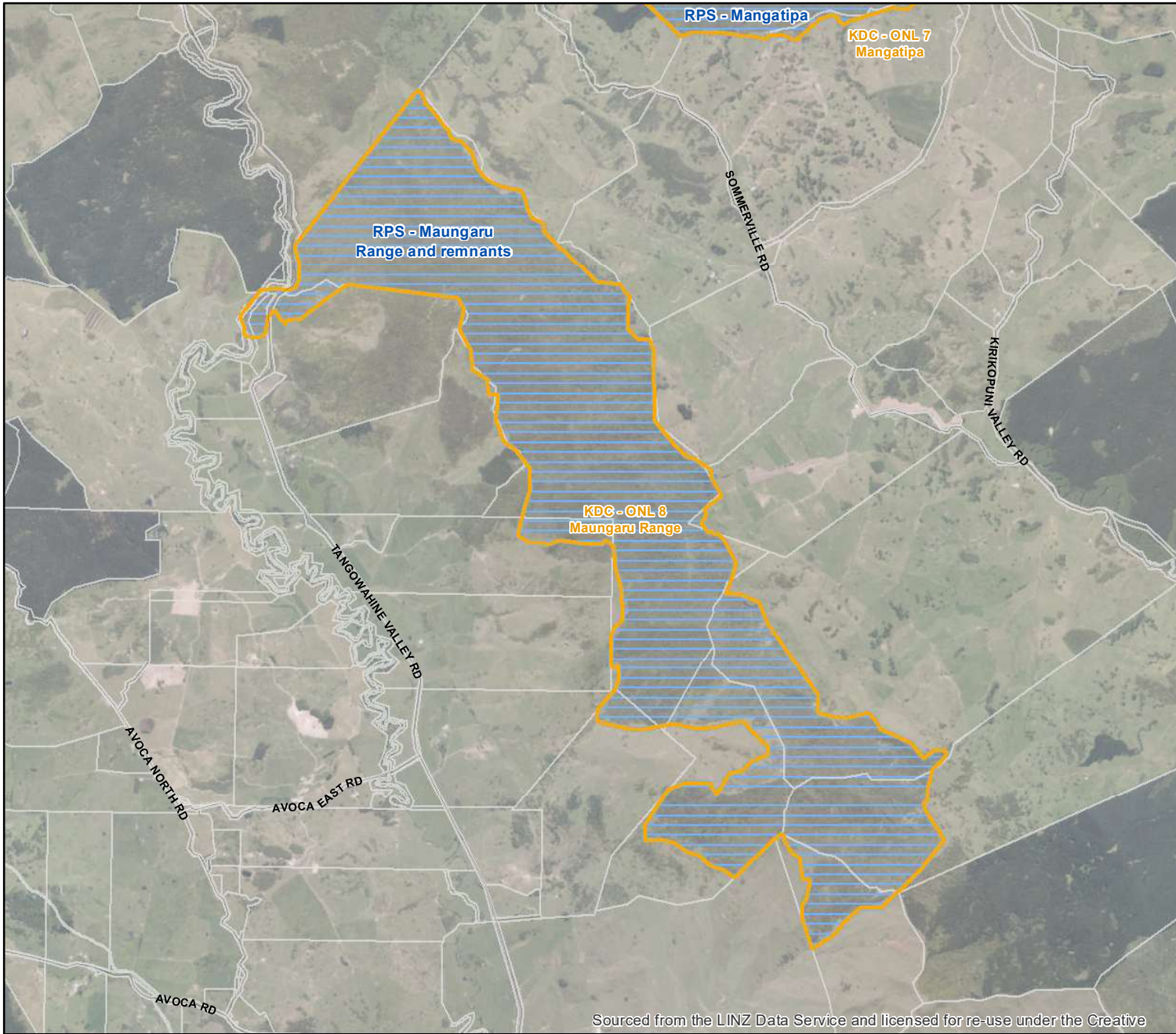


24E56





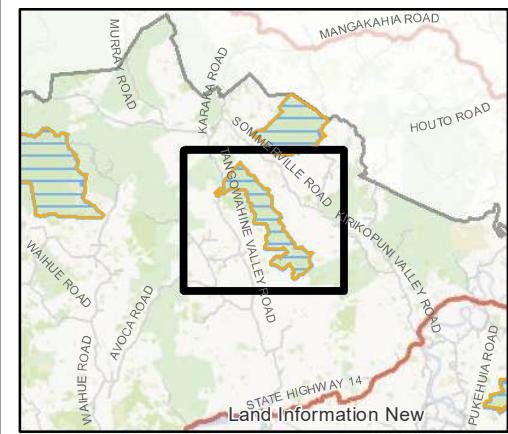
24E58

**Appendix B: ONL8, ONL9 and ONL23 Comparison Maps.**



### ONL 8 - MAUNGARU RANGE

-  Outstanding Natural Landscapes (Operative District Plan - Nov 2013)
-  Outstanding Natural Landscapes (NRC RPS - May 2016)



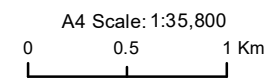
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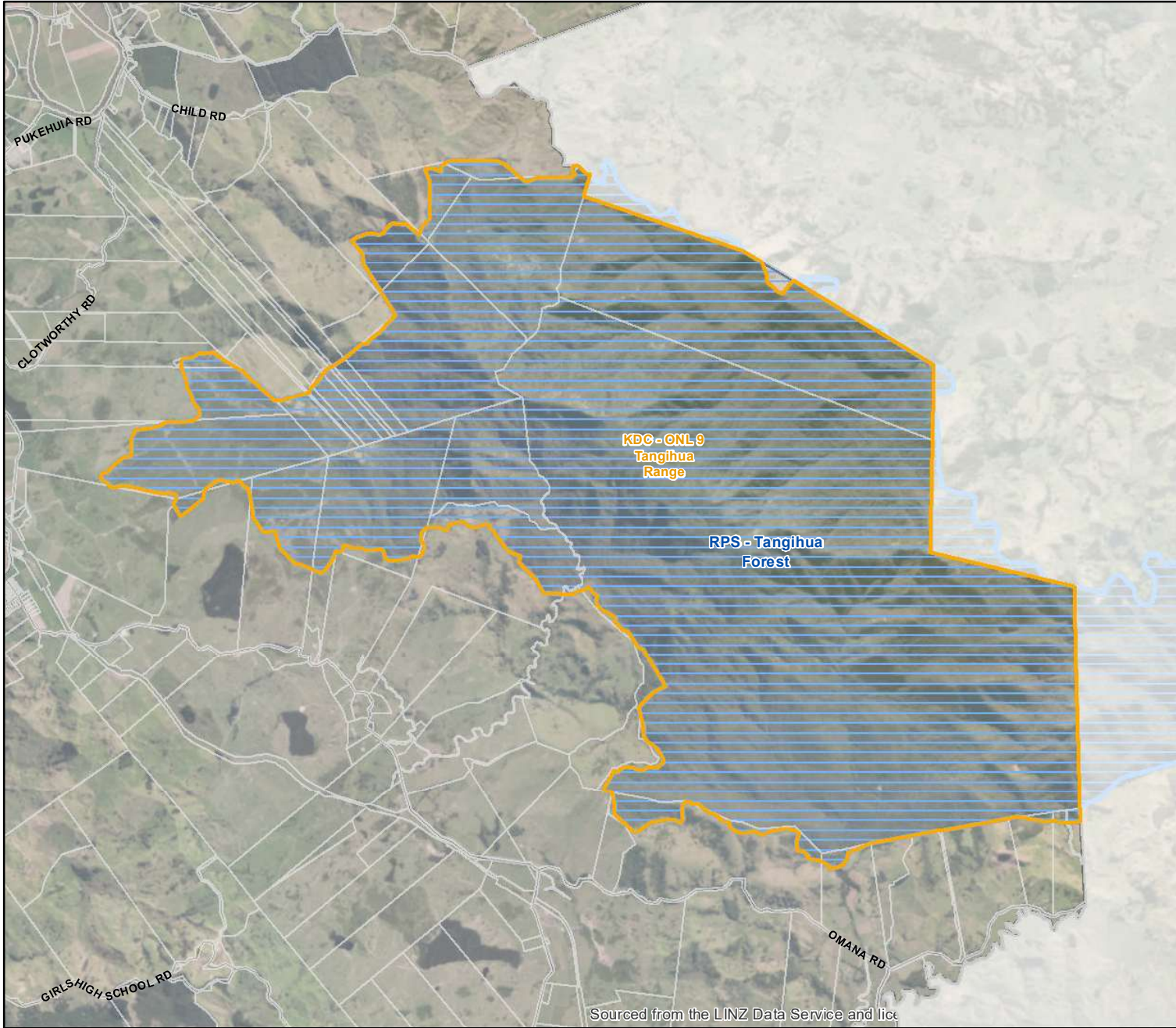
Sourced from the LINZ Data Service and licensed for re-use under the Creative

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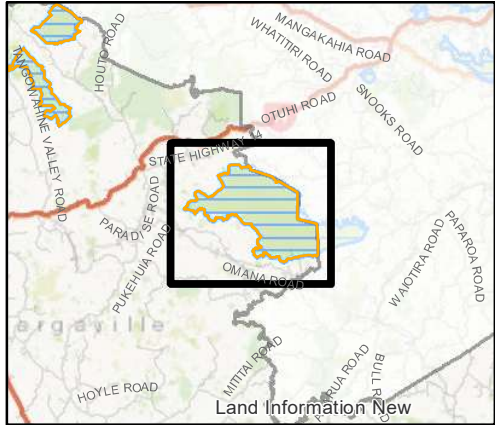
## KAIPARA DISTRICT OUTSTANDING NATURAL LANDSCAPES





### ONL 9 - TANGIHUA RANGE

-  Outstanding Natural Landscapes (Operative District Plan - Nov 2013)
-  Outstanding Natural Landscapes (NRC RPS - May 2016)

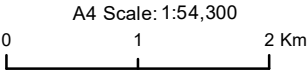


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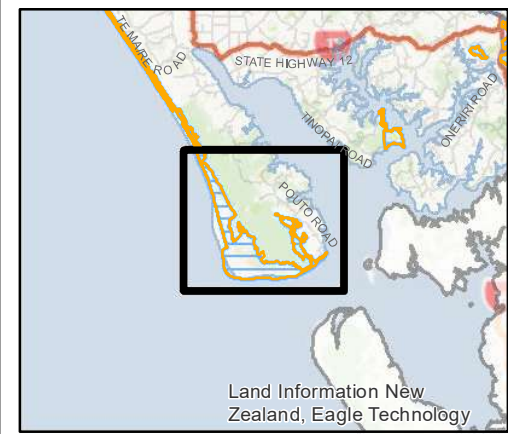
## KAIPARA DISTRICT OUTSTANDING NATURAL LANDSCAPES





## ONL 23 - NORTH HEAD COAST AND WESTERN DUNE LAKES

-  Outstanding Natural Landscapes (Operative District Plan - Nov 2013)
-  Outstanding Natural Landscapes (NRC RPS - May 2016)



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# KAIPARA DISTRICT OUTSTANDING NATURAL LANDSCAPES

A4 Scale: 1:99,900  
 0 1 2 Km

