

FURTHER SUBMISSION

TELEPHONE 0800 327 646 | WEBSITE WWW.FEDFARM.ORG.NZ

To: District Planning Team
Kaipara District Council
Private Bag 1001
Dargaville 0340
Via email: districtplanreview@kaipara.govt.nz

Further Submissions on: **Proposed Kaipara District Plan – Light Topic**

Date: 4 November 2025

Further Submissions by: Federated Farmers of New Zealand (Inc) – Northland Province

Submission by: Federated Farmers of New Zealand (Inc) – Northland Province
(Submitter No. 136)

Contact details for Submitter **COLIN HANNAH**
NORTHLAND PROVINCIAL PRESIDENT
Federated Farmers of New Zealand
M 027 226 5585
E jcookmunro@fedfarm.org.nz

Address for service: **JO-ANNE COOK MUNRO**
SENIOR RESOURCE MANAGEMENT SOLICITOR
Federated Farmers of New Zealand (Inc)
M 027 331 0084
E jcookmunro@fedfarm.org.nz

1. INTRODUCTION

- 1.1 Federated Farmers welcomes the opportunity to provide further submissions on the Proposed Kaipara District Plan – Light Topic.
- 1.2 Federated Farmers of New Zealand (Inc) (**Federated Farmers**) has an interest in the Proposed Kaipara District Plan that is greater than the interest the general public has.
- 1.3 Federated Farmers is a primary sector organisation with a long and proud history of representing the needs and interests of New Zealand farmers involved in a range of rural businesses. We are a pan sector organisation that works with farmers to ensure practical and workable outcomes.
- 1.4 In Northland, Federated Farmers has a membership base of over 500 members who are involved in a wide range of land use activities in Northland including dairy, dry stock, arable, horticulture and lifestyle. There are over 158 active members located in the Kaipara district.

- 1.5 Federated Farmers also represents rural communities and our rural contractors and rural butchers who are also members.
- 1.6 Federated Farmers aims to add value to its members' farming businesses. Its key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
- (a) our members may operate their business in a fair and flexible commercial environment;
 - (b) our members' families and their staff have access to services essential to the needs of the rural community; and
 - (c) our members adopt responsible management and environmental practices.
- 1.7 Federated Farmers made submissions on the Proposed Kaipara District Plan and has been assigned the submitter number 136 as shown on p1 of the summary of submissions document¹ for the Light Topic available on the Council's website.
- 1.8 Section 2 of this further submission contains the table that sets out Federated Farmers' further submissions in respect of submission points made by other parties on the Proposed Kaipara District Plan – Light Topic. The table also indicates whether Federated Farmers supports or opposes these primary submissions, the reasons for the position that it has taken, and the relief sought.
- 1.9 Federated Farmers wishes to be heard in support of these further submissions.
- 1.10 If others are making a similar submission, Federated Farmers will consider presenting a joint case with them at the hearing.
- 1.11 Federated Farmers could not gain an advantage in trade competition through these further submissions.
- 1.12 Federated Farmers seeks any consequential changes necessary to give effect to the relief sought in each of the individual submission points made
- 1.13 Federated Farmers can confirm that copies of this further submission have been served on the parties who made the original submission.

¹ Kaipara District Council, *Proposed Kaipara District Plan: Part 2 – District-wide matters / General District-Wide Matters / Light Summary of Submissions - LIGHT*, October 2025.

² Submitter Number assigned to original submission.

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
FS2.3					requirement when it is not known exactly what the effects are that need to be managed.	OR with wording that achieves a similar effect.
	149.98		The submitter sought the addition of a new clause to LIGHT-P2 as follows: <u>Avoid areas of significant indigenous biodiversity other than necessary for health and safety purposes.</u> The submitter also sought any consequential amendments and alternative relief to address the concerns raised.	Support in part	Federated Farmers made a submission to LIGHT-P2 that requested the policy be kept as notified.	Federated Farmers seeks the amendment of the proposed new clause to LIGHT-P2 so that it reads: <u>Where possible, avoid Avoid areas of significant indigenous biodiversity other than necessary for health, security and safety purposes.</u> OR with wording that achieves a similar intent.
	149.99		The submitters sought the addition of a new standard to LIGHT-R1.a. for artificial outdoor lighting within the Coastal Environment, Outstanding Natural Features and Landscapes, and areas containing indigenous biodiversity to avoid adverse effects of lighting on indigenous biodiversity. As well, the submitter sought that the following matters of discretion be added to the new LIGHT-R1 standard: <u>The effect of the light on indigenous biodiversity values</u> <u>The extent of light and any practicable locations or methods to avoid or reduce the extent of effects on indigenous biodiversity values</u> <u>The proposed measures to avoid, remedy, mitigate, offset or compensate adverse effects on indigenous biodiversity values</u> The submitter also sought any consequential amendments and	Support in part	Federated Farmers supports the intent behind the submission made but seeks amendments to what has been sought. It made its own submission to this rule which sought that clause 3.c should be amended to be consistent with LIGHT-P1.	Federated Farmers seeks the following: (a) any new standard added to Light-R1.a refers to the effects hierarchy of 'avoid, remedy or mitigate' rather than just 'avoid'. (b) the relief proposed new matter of discretion in bullet point 3 of the submission refers to 'avoid, remedy or mitigate' and any references to offsetting or compensation is declined. (c) Clause 3.c is amended to achieve consistency with the wording set out in LIGHT-P1. AND Any other consequential amendments required to give effect to the relief sought above.

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for submission made further	Relief sought
			alternative relief to address the concerns raised.			
Director-General of Conservation FS2.5	304.115	LIGHT	The submitter sought the addition of a new Light objective as follows: <u><i>An environment free from adverse effects of intrusive lighting.</i></u> The submitter also sought any further or alternative relief to like effect to that sought.	Oppose	Federated Farmers believes that the new objective as written is too absolute and has the potential to adversely impact on everyday farming operations in the rural environment. It is not known what the submitters consider to be intrusive lighting and their submission does not acknowledge the need for lighting to be in places for health, safety and security purposes.	Federated Farmers seeks that the relief sought by the submitter is declined.
FS2.6	304.116		The submitter sought that LIGHT-R1 matters of discretion was amended to include the assessment of ecological effects. The submitter also sought any further or alternative relief to like effect to that sought.	Oppose	The relief sought by the submitter is outside the scope of the LIGHT chapter and has the potential to add unwarranted delays and costs into a permitted activity process. What the submitter has asked for is included in the matters of discretion for restricted discretionary activities under the rule.	Federated Farmers seeks that the relief sought by the submitter is declined.