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**Form 6: Further submission in support of, or in opposition to, submission on notified proposed policy statement or plan, change or variation**

*Pursuant to clause 8 of the First Schedule of the Resource Management Act 1991*

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**To:** Kaipara District Council (**the Council**)

**Name of submitter:** Director-General of Conservation (the **Director-General** or the **DG**)

1. This is a further submission in support of (or in opposition to) a submission on the following proposed plan (the **Proposal**):

**Proposed Kaipara District Plan – All other matters**

2. I could not gain an advantage in trade competition through this submission.
3. The **Director-General** represents relevant aspects of public interest and has interest in the proposal that is greater than the interest the general public. The Director-General has all the powers reasonably necessary to enable the Department of Conservation (**DOC**) to perform its functions<sup>1</sup>. The Conservation Act 1987 (the **CA**) sets out DOC's functions which include (amongst other things) management of land and natural and historic resources for conservation purposes, preservation so far as is practicable of all indigenous freshwater fisheries, protection of recreational freshwater fisheries and freshwater fish habitats and advocacy for the conservation of natural resources and historic heritage<sup>2</sup>. Section 2 of the CA defines 'conservation' to mean *'the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations'*.
4. My views on specific submissions are set out in **Attachment 1** to this submission.
5. I wish to be heard in support of my further submission.

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<sup>1</sup> Refer section 53 Conservation Act 1987.

<sup>2</sup> Conservation Act 1987, section 6.

6. If others make a similar submission, I will consider presenting a joint case with them at the hearing.
7. A copy of this submission has been served on the original submitters.

Stephen Soole  
Operations Manager  
Kauri Coast  
Department of Conservation  
Acting pursuant to delegated authority on behalf the Director-General of Conservation



Date: 15 December 2025

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

**Address for service:**

Attn: Ronan Whitelock, Resource Management Planner  
rwhitelock@doc.govt.nz and cc to: [RMA@doc.govt.nz](mailto:RMA@doc.govt.nz)  
Department of Conservation  
Private Bag 3072, Hamilton, 3240

**ATTACHMENT 1:**

**Proposed Kaipara District Plan  
FURTHER SUBMISSIONS BY THE DIRECTOR-GENERAL OF CONSERVATION  
For All Other Matters**

**FS45.1**

<b>Name of original submitter</b>	<b>Original submitter number</b>	<b>Original submission point number</b>	<b>DG's Position on Submission (Support or oppose)</b>	<b>Provision</b>	<b>Reasons for support or opposition</b>	<b>I seek that the submission be:</b>
Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ	26	26.56	Support in part	NH-R13	Support in part, however, consider a matter of discretion should include the consideration of effects on wildlife, natural areas and on areas of indigenous flora and fauna.	Allowed in part

FS45.2

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ	26	26.59	Oppose	ECO-P3	Do not support as the policy is labelled to be for the 'protection and maintenance of indigenous biodiversity', but instead it provides very enabling clauses for primary production, infrastructure and economic development of land which do not recognise and provide for s6(c) of the RMA or enable Council's functions under s31 of the RMA.	Disallowed
Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ	26	26.63	Support in part	NATC-P5.7	Support in part as the policy provides some appropriate assessment requirements for resource consents. However, it is considered further amendments are required so the policy recognises and provides for s6(c) of the RMA.	Allowed in part

FS45.3

FS45.4

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ	26	26.64	Oppose in part	NATC-R3	Concerned with how permissive this rule is considering earthworks can result in adverse effects on the natural character of wetland, lakes, and river margins, particularly in relation to matters of s6(c) of the RMA.	Disallowed
Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ	26	26.65	Oppose	NATC-R4	Concerned as the rule provides for unrestricted indigenous vegetation clearance within wetland, lake and river margins which can contain significant indigenous vegetation and significant habitat. This rule does not recognise and provide for s6(c) of the RMA.	Disallowed

FS45.5

FS45.6

FS45.7

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ	26	26.72	Oppose	NFL-R3	Do not support as the rule provides for unrestricted vegetation clearance in ONL's inside and outside of the coastal environment without any significance identification. This does not recognise and provide for s6(C) and does not give effect to the NZCPS.	Disallowed
Alex Flavell	30	30.2	Support in part	Planning Maps	Support mapping areas of significant indigenous vegetation and significant habitats of indigenous fauna as this would recognise and provide for s6(c) of the RMA.	Allowed in part

FS45.8

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Federated Farmers of New Zealand (Inc) - Northland Province	136	136.29	Oppose	Definition – Wetland, lake and river margins	Do not support the reduction in setback from 30m to 10m. The submitter notes that the National Environmental Standard for Freshwater (NES-FW) provides for a 10m setback for certain activities from natural wetlands. It is noted that other activities are subject to further setbacks than 10m (E.g., Regulation 45D(3)). Regardless, the NES-FW also enables council plan rules to be more stringent.	Disallowed
Federated Farmers of New Zealand (Inc) - Northland Province	136	136.52	Oppose	ECO-P1	Do not support as it is considered changes are required to the policy to ensure it gives effect to the NZCPS.	Disallowed

FS45.9

FS45.10

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Federated Farmers of New Zealand (Inc) - Northland Province	136	136.71	Oppose in part	NATC-R1	Do not support the change of the activity status when compliance is not achieved. It is considered NATC-P5 provides appropriate assessment which recognises and provides for section 6(C) matters, and any subsequent provisions set out in higher order planning documents – NPSFM, NPSFM.	Allowed in part
Federated Farmers of New Zealand (Inc) - Northland Province	136	136.82	Oppose in part	NFL-P4	Support the intent to simplify the policy for plan effectiveness. However, oppose in part the amendments sought by the submitter as they do not implement RMA section 6(b) and the relevant policy direction sufficiently.	Disallowed in part

FS45.11

FS45.12

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Federated Farmers of New Zealand (Inc) - Northland Province	136	136.83	Oppose in part	NFL-P6	Support in part the additions provided to the policy. However, consider the policy needs to consider additional matters to appropriately implement RMA section 6(b) and the relevant policy direction.	Disallowed in part
Federated Farmers of New Zealand (Inc) - Northland Province	136	136.86	Oppose in part	NFL-R3	Do not support, because additions sought to the rule is inconsistent with any recognition and provision for relevant matters of national importance ) under the RMA.	Disallowed in part
Federated Farmers of New Zealand (Inc) - Northland Province	136	136.103	Support in part	New Objectives and Policies to support SUB-R6	Consider the objective and policy additions/deletions outlined in the DG's original submission (submission point 304.100) provides an appropriate policy framework for Rule SUB-R6.	Allowed in part

FS45.13

FS45.14

**FS45.15**

<b>Name of original submitter</b>	<b>Original submitter number</b>	<b>Original submission point number</b>	<b>DG's Position on Submission (Support or oppose)</b>	<b>Provision</b>	<b>Reasons for support or opposition</b>	<b>I seek that the submission be:</b>
Federated Farmers of New Zealand (Inc) - Northland Province	136	136.110	Support in part	CE-P3	Support in part the additions provided by the submitter. However, consider the relief sought in the DG's original submission (submission point 304.109) should be included to provide effective weed and animal pest management.	Allowed in part
Horticulture New Zealand	140	140.4	Support	Definition – Reverse Sensitivity	Support the inclusion of reverse sensitivity as a definition.	Allowed
Horticulture New Zealand	140	140.50	Oppose in part	ECO-R1	Concerned about adding diseased vegetation into this rule, without technical confirmation. Otherwise, it creates the possibility of indigenous biodiversity to be declared diseased in order to remove it for development or other purposes.	Disallowed in part

**FS45.16**

**FS45.17**

FS45.18

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Horticulture New Zealand	140	140.53	Oppose	NATC-P5	Oppose the deletion of this policy, as it provides assessment requirements for activities that do not achieve compliance with Rules NATC-R1-R4, particularly those that trigger a Discretionary activity status.	Disallowed
Horticulture New Zealand	140	140.54	Support in part	NATC-R3	Support the inclusion of erosion sediment control, as slips and erosion events can cause damage to waterways.	Allowed in part
Horticulture New Zealand	140	140.55	Oppose in part	NATC-R4	Not opposed to the inclusion of vegetation clearance for the purpose of biosecurity control but the proposed drafting needs to be narrowed e.g., to only enable clearance of plants classified as pests/weeds under the Biosecurity Act 1993 and/or the applicable Regional Pest Management Plan	Disallowed in part

FS45.19

FS45.20

FS45.21

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Horticulture New Zealand	140	140.56	Oppose	NATC-S3	Do not support the inclusion of earthworks within this standard, as the request does not appear to be within the scope of this standard, which is intended for vegetation clearance.	Disallowed
Horticulture New Zealand	140	140.66	Oppose	CE-P6	Do not support the deletion of this policy, as this provides a basis for assessment for activities which do not achieve compliance with their respective rule. This policy also provides policy guidance when assessing discretionary and non-complying activities.  However, not opposed to restricted discretionary activities having more specific matters of control.	Disallowed

FS45.22

FS45.23

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Horticulture New Zealand	140	140.68	Support in part	CE-R3	Support the inclusion of biosecurity clearance within the coastal environment, however, consider more clear controls need to apply to recognise and provide for section 6(c) of the RMA and to give effect to Policy 11 of the NZCPS.	Allowed in part
Horticulture New Zealand	140	140.69	Support in part	CE-R4	Support the inclusion of biosecurity clearance within the coastal environment, however, consider more clear controls need to apply to recognise and provide for section 6(c) of the RMA.	Allowed in part
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.1	Support	Purpose	Support the request for amendments to be made to the purpose chapter of the plan, which ensures the purpose of the plan aligns with the purpose of the RMA, and subsequent higher order planning documents.	Allowed

FS45.24

FS45.25

**FS45.26**

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.2	Support	Definition – Vegetation Clearance	Support the change of vegetation clearance to Vegetation Alteration and Clearances it provides more clear wording on what vegetation clearance includes.	Allowed
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.6	Support	SD-NE-O4	Support the additional wording this objective as its recognises and provides for s6(a), has regard to s7(f) of the RMA.	Allowed
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.7	Support	New Strategic Direction Environment Objective (SD-NE-O4)	Support the inclusion of an additional objective which gives effect to higher order planning documents.	Allowed
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.8	Support	New Strategic Direction Environment Objective (SD-NE-O5)	Support the inclusion of an additional objective which gives effect to higher order planning documents.	Allowed

**FS45.27****FS45.28****FS45.29**

	<b>Name of original submitter</b>	<b>Original submitter number</b>	<b>Original submission point number</b>	<b>DG's Position on Submission (Support or oppose)</b>	<b>Provision</b>	<b>Reasons for support or opposition</b>	<b>I seek that the submission be:</b>
<b>FS45.30</b>	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.9	Support	New Strategic Direction Environment Objective (SD-NE-O6)	Support the inclusion of an additional objective which gives effect to higher order planning documents.	Allowed
<b>FS45.31</b>	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.10	Support	New Strategic direction Urban Form and Development Objective (SD-UFD-O6)	Support the inclusion of an additional objective to give effect to Policy 14 of the NPSIB.	Allowed
<b>FS45.32</b>	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.11	Support	New Strategic direction Urban Form and Development Objective (SD-UFD-O7)	Support the inclusion of an additional objective to give effect to Policy 14 of the NPSIB.	Allowed
<b>FS45.33</b>	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.15	Support	REG-O1	Support the alternative wording as it more clearly conveys the intent to balance the benefits of REG activities with the need to manage their adverse effects	Allowed

FS45.34

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.17	Support	REG-P4	<p>Support the additional wording as it requires consideration of appropriateness of the locality in relation to the scale of effects associated with the activity. The inclusion of residual effects is supported as it provides coverage for all effects associated with REG activities.</p> <p>It is considered these additions can be appropriately incorporated alongside the changes recommended in the DGs submission point 304.41.</p>	Allowed
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.18	Support	REG-P8	Support the reference back to REG-P4 which requires the application of effects management set out in section 17 of the RMA.	Allowed

FS45.35

FS45.36

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.19	Support	REG-P10	Support the inclusion of consideration for sensitive locations, and environments, as REG activities are not appropriate or compatible with sensitive locations and environments.	Allowed
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.20	Support in part	Renewable Electricity Generation	Support in part avoiding adverse effects of REG activities in sensitive environments. However, consider the definition of sensitive environments would need to be clearly defined, so that REG activities can be located appropriately. Additionally, it would be difficult to avoid adverse effects of REG activities in areas of significant indigenous vegetation or significant habitat or fauna, if these areas are not identified/ or mapped.	Allowed in part

FS45.37

FS45.38

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.21	Support	REG-R2	Support the changes sought to this rule, specifically the use of standard as a mechanism to manage or limit potential adverse effects.  Agree that this rule should only apply to permitted and lawfully established REG activities	Allowed
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.22	Support	Renewable Electricity Generation - New Rule	Support the addition of a new rule for operation, maintenance, or repair activities that do not meet the permitted standards of REG-R2, as currently an activity standard for when compliance is not achieved has not been provided.	Allowed
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.32	Support	Infrastructure Rules	Agree that the rules and matters of discretion should recognise and manage adverse effects of infrastructure on natural character, indigenous biodiversity and other values.	Allowed

FS45.40

	<b>Name of original submitter</b>	<b>Original submitter number</b>	<b>Original submission point number</b>	<b>DG's Position on Submission (Support or oppose)</b>	<b>Provision</b>	<b>Reasons for support or opposition</b>	<b>I seek that the submission be:</b>
<b>FS45.41</b>	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.33	Support	Transport Overview	Agree the introductory text of this chapter should include a description to recognise transport corridors as opportunities to enhance indigenous vegetation and biodiversity values.	Allowed
<b>FS45.42</b>	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.35	Support	TREE-P3	Support the inclusion from the submitter which ensures the continued health, structural integrity and values of trees is protected. This recognises for section 6(c) and (f) of the RMA.	Allowed
<b>FS45.43</b>	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.36	Support	TREE-R1	Agree that an activity status needs to be assigned when compliance of not achieved.	Allowed
<b>FS45.44</b>	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.37	Support	Ecosystems and Indigenous Biodiversity	Agree that areas of areas of significant indigenous vegetation and significant habitats of indigenous fauna can be identified using the Appendix 5 Criteria of the NRPS.	Allowed

**FS45.45**

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.49	Support	NATC-P2	Agree the policy should be updated to ensure effects on wetland, lake and river margins should be avoided, remedied or mitigated.	Allowed
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.55	Oppose	NATC-S3	Do not support the proposed cumulative threshold, as this permits the same amount of vegetation clearance as the standard currently permits.	Disallowed
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.56	Support	NFL-P2	Support the proposed amendments as this recognises and provides for s6(b) of the RMA.	Allowed
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.57	Support	NFL-P3	Consider it appropriate for this policy to be relocated into the Coastal Environment chapter for efficiency and effectiveness.	Allowed

**FS45.46****FS45.47****FS45.48**

**FS45.49****FS45.50****FS45.51****FS45.52**

	<b>Name of original submitter</b>	<b>Original submitter number</b>	<b>Original submission point number</b>	<b>DG's Position on Submission (Support or oppose)</b>	<b>Provision</b>	<b>Reasons for support or opposition</b>	<b>I seek that the submission be:</b>
	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.58	Support	NFL-P5	Agree with proposed wording amendment, as it is considered alternatives test is an appropriate measure to implement to ensure ONFs and ONLs are protected.	Allowed
	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.65	Support	NFL Overview	Agree that the overview should include some commentary relating to restricting public access in the coastal environment. This gives effect to Policy 19 and 20 of the NZCPS.	Allowed
	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.66	Support	PA-O2	Support the recommended additions as public access should be restricted, especially in the coastal environment. This gives effect to Policy 19 and 20 of the NZCPS.	Allowed
	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.67	Support	Public Access new policy	Support as this new policy as it recognises and provides for section 6(c) of the RMA.	Allowed

	<b>Name of original submitter</b>	<b>Original submitter number</b>	<b>Original submission point number</b>	<b>DG's Position on Submission (Support or oppose)</b>	<b>Provision</b>	<b>Reasons for support or opposition</b>	<b>I seek that the submission be:</b>
<b>FS45.53</b>	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.72	Support	SUB-P2	Agree that this policy should be amended to include outcomes to give effect to the NZCPS and NPSFM.	Allowed
<b>FS45.54</b>	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.74	Support	SUB-P8	Support the wording proposed as a new clause to this policy as it recognises and provides for section 6(c) of the RMA.	Allowed
<b>FS45.55</b>	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.75	Support	Subdivision new objectives, policies and rules	Support the inclusion of new objectives, policies and rules which appropriately manage subdivision in the coastal environment.	Allowed
<b>FS45.56</b>	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.76	Support	Subdivision new objectives, policies and rules	Support the inclusion of rules and standards which appropriately manage areas that require preservation (ONFs, ONLs) under section 6 of the RMA.	Allowed

	<b>Name of original submitter</b>	<b>Original submitter number</b>	<b>Original submission point number</b>	<b>DG's Position on Submission (Support or oppose)</b>	<b>Provision</b>	<b>Reasons for support or opposition</b>	<b>I seek that the submission be:</b>
<b>FS45.57</b>	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.80	Support	Coastal environment, new objectives and policies	Agree that additional objectives and policies are required to give effect to the NZCPS and NRPS.	Allowed
<b>FS45.58</b>	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.82	Support	CE-R2	Agree that standards are required for regional significant infrastructure. This ensures they are appropriately managed but also that if compliance is not achieved, the activity triggers the next activity status set out in the rule.	Allowed
<b>FS45.59</b>	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.85	Support	CE-S4	Agree that following the completion of earthworks, vegetation should be reinstated in less than 12 months. This applies a precautionary approach.	Allowed
<b>FS45.60</b>	Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.87	Support	Earthworks Overview	Agree the earthworks overview should recognise the actual and potential adverse effects on indigenous biodiversity.	Allowed

FS45.61

FS45.62

FS45.63

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.91	Support	EW-P4	Support the addition of more clauses to this policy. Especially measures which require the re-establishment of indigenous vegetation and ecosystems.	Allowed
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.92	Support in part	Earthwork Rules	Consider that earthworks within sensitive overlays should become more restrictive and to enable protection.	Allowed in part
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.93	Support in part	EW-R2	Agree that an activity status should be specified when compliance is not achieved with the performance standards.	Allowed

FS45.64

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.94	Support	EW-R3	Support the addition of standards relating to silt, sediment and dust control. Also agree that setback standards would be appropriate to manage effects of farm quarrying activities on indigenous vegetation. This would recognise and provide for s6(c) of the RMA.	Allowed
Royal Forest and Bird Protection Society of New Zealand Incorporated	149	149.95	Support	EW-R4	Support the requirement for a rehabilitation plan to be prepared in order manage effects from quarrying or mining activities on indigenous biodiversity.	Allowed

FS45.65

FS45.66

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Atlas Quarries Ltd and Hukatere Quarries Ltd	152	152.2	Neutral	Planning Maps	DOC is not opposed to the establishment of a Quarrying Zone or Overlay. However, consider these zones and overlays should be located appropriately to not conflict with sensitive overlays including Outstanding Natural Landscapes and Outstanding Natural Features.	Allowed in part
Atlas Quarries Ltd and Hukatere Quarries Ltd	152	152.4	Oppose	Part 2, or Part 3 new Minerals Chapter	DOC is not opposed to the creation of a new chapter for Minerals. However, this chapter should be designed to recognise and provide for s6(c) of the RMA. Additionally, it would be more effective and efficient for this Minerals to be addressed as a zone with corresponding Chapter.	Disallowed

FS45.67

FS45.68

FS45.69

FS45.70

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Atlas Quarries Ltd and Hukatere Quarries Ltd	152	152.5	Neutral	General	DOC is not opposed to the creation of a buffer area. However, these buffer areas would need to be carefully established in relation to sensitive planning overlays including Outstanding Natural Landscapes and Outstanding Natural Features.	Allowed in part
Atlas Quarries Ltd and Hukatere Quarries Ltd	152	152.6	Neutral	New Zone	DOC is not opposed to the creation of a new zone for Minerals. However, this zone would need to be designed with policies managing effects of activities to recognise and provide for s6(c) of the RMA.	Allowed in part
Mangawhai Matters Inc	177	177.5	Support	Planning Maps	Support the inclusion of this overlay with the controls from the Private Plan Changes referred to being imposed within the spatial overlay.	Allowed

FS45.71

FS45.72

FS45.73

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Bupa Care Services Limited	214	214.4	Oppose in part	Estuary Estates (Mangawhai Central)	DOC is not opposed to providing retirement villages outside of the Coastal Buffer Overlay. However, there are concerns with how effects from retirement villages in areas of significant indigenous vegetation or habitat and fauna will be managed.	Disallowed in part
Cabra Mangawhai Ltd & Pro Land Matters Ltd	216	216.46	Support	Planning Maps	Support mapping areas of significant indigenous vegetation and significant habitats of indigenous fauna. This would recognise and provide for s6(c) of the RMA.	Allowed
Cato Bolam Consultants Limited	217	217.43	Support in part	ECO-R1.e.	Support reducing the extent of clearance to setback residential units from areas of indigenous vegetation. 20m of clearance is considered excessive. A buffer narrower than 10m should be considered.	Allow in part

FS45.74

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Cato Bolam Consultants Limited	217	217.43	Allow in part	ECO-R1.f.	Agree with the intent of the reduction in indigenous vegetation clearance for a dwelling. However, consider that 500m <sup>2</sup> is still an inappropriate amount of permitted clearance without any assessment of the significance of the vegetation to recognise and provide for section 6(c) of the RMA.	Allow in part
Cato Bolam Consultants Limited	217	217.52	Support	Subdivision – New Policy	Support the inclusion of a policy which provides guidance for ecological benefit lots.	Allowed
Cato Bolam Consultants Limited	217	217.193	Support	Natural Environment	Consider subdivision to encourage environmental benefit for rural subdivision instead of non-ecological benefits appropriate as this aligns with Council's functions under s31 of the RMA	Allowed

FS45.75

FS45.76

FS45.77

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
KMA IQ Trustee Limited	223	223.13	Oppose	CE-P6	Do not support the deletion of this clause in the Policy. As notified this part of the policy appropriately provides for assessment of the functional and operational need for an activity to be located in the coastal environment.	Disallowed
KMA IQ Trustee Limited	223	223.16	Oppose	CE-S4	Do support the deletion of a maximum earthworks volume standard within the coastal environment. This would not give effect to Objective 1 of the NZCPS.	Disallowed
Piroa Conservation Trust	257	257.4	Support	NFL-O2	Support the inclusion of conservation into this objective. Natural Features and Landscapes and Outstanding should be conserved where appropriate.	Allowed
Piroa Conservation Trust	257	257.5	Support	NFL-P1	Support the inclusion of 'protect' in the policy as this recognises and provides for s6(b) of the RMA.	Allowed

FS45.78

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FS45.84

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Piroa Conservation Trust	257	257.13	Support in part	NFL-S5	Support the inclusion of these additional compliance requirements which recognise and provide for section 6(c) of the RMA.	Allowed in part
Piroa Conservation Trust	257	257.15	Support	Subdivision Overview	Support the inclusion of the text provided by the submitter as it sets out the importance of subdivision within the district to respond to values of the coastal environment, and its sensitive environments.	Allowed
Piroa Conservation Trust	257	257.21	Support in part	SUB-S4	Support the inclusion of this as a matter of discretion. However, it is considered that areas of Outstanding Natural Features should also be included to give effect to Policy 15 of the NZCPS.	Allowed
Piroa Conservation Trust	257	257.25	Support	ECO-O3	Support the inclusion of this wording as it provides a clear outcome which recognises and provides for s6(c) of the RMA.	Allowed

FS45.85

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Environmental Defence Society Incorporated	265	265.3	Support in part	Ecosystems and Indigenous Biodiversity	Agree that the chapter does not give effect to higher order planning documents including the NPSIB. It is noted that the NPSIB requirement to identify of Significant Natural Areas has been delayed until 2027. However, s6(c) is not disapplied, and areas of areas of significant indigenous vegetation and significant habitats of indigenous fauna could be mapped accordingly.	Allowed in part
Environmental Defence Society Incorporated	265	265.6	Support in part	Public Access	Agree the chapter needs amending to give effect to the NPSIB, NPSFM and section 6(c) of the RMA.	Allowed in part
Environmental Defence Society Incorporated	265	265.7	Support in part	Coastal Environment	Agree the chapter needs amending to give effect to the NZCPS.	Allowed in part

FS45.86

FS45.87

**FS45.88****FS45.89****FS45.90****FS45.91**

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Northland Fish and Game Council	267	267.8	Support	ECO-R2	Agree the rule provides to large of an area of indigenous vegetation clearance. Currently this rule does not recognise and provide for section 6(c) of the RMA.	Allowed
Northland Fish and Game Council	267	267.13	Support	NATC-R3.1	Agree with the submitter that earthworks within wetland, lake and river margins for conservation and biosecurity activities should be provided for in this rule.	Allowed
Northland Fish and Game Council	267	267.14	Support	NATC-R4	Agree with the submitter that indigenous vegetation within wetland, lake and river margins for conservation and biosecurity activities should be provided for in this rule.	Allowed
Heritage New Zealand Pouhere Taonga	270	270.51	Support	Coastal Environment Overview	Support the inclusion of this text in the overview of this chapter as it recognises for s6(e) of the RMA.	Allowed

**FS45.92**

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
Marunui Conservation Ltd	278	278.34	Support	Definition – Ecosystems	Support the inclusion of a definition for Ecosystem. Particular wording to this was provided in the submission point 304.15 of the DG's original submission.	Allowed
Marunui Conservation Ltd	278	278.35	Support	New Definition – Environmental Benefit Lot	Support the inclusion of a definition for environmental benefit lot.	Allowed
Marunui Conservation Ltd	278	278.36	Support	New definition – Ecosourcing	Support the inclusion of ecosourcing as a new definition.	Allowed
Marunui Conservation Ltd	278	278.37	Support	New definition – Outstanding Natural Feature	Support the inclusion of the definition of Outstanding Natural Feature in the PDP.	Allowed
Marunui Conservation Ltd	278	278.38	Support	New definition – Outstanding Natural Landscape	Support the inclusion of the definition of Outstanding Natural Landscape	Allowed

**FS45.93****FS45.94****FS45.95****FS45.96**

	<b>Name of original submitter</b>	<b>Original submitter number</b>	<b>Original submission point number</b>	<b>DG's Position on Submission (Support or oppose)</b>	<b>Provision</b>	<b>Reasons for support or opposition</b>	<b>I seek that the submission be:</b>
<b>FS45.97</b>	Northpower Limited and Northpower Fibre Limited	283	283.5	Oppose in part	General	DOC is not opposed to the provision of small-scale electricity and telecommunication assets in relevant chapters. However, there are concerns with how permissive these permitted activities would be, as it is considered their effects on sensitive environments could be unmanaged.	Disallowed in part
<b>FS45.98</b>	Northpower Limited and Northpower Fibre Limited	283	283.36	Oppose in part	Strategic Direction – Natural Environment – New objective	DOC is not opposed to the operational and functional need of infrastructure. However, concerned with the wording of this proposed objective and how it would interact with s6(C) of the RMA.	Disallowed in part
<b>FS45.99</b>	Northpower Limited and Northpower Fibre Limited	283	283.42	Support in part	Strategic Direction – New Objective	Support in part the inclusion of this objective as provides appropriate effects management for the effects associated with regionally significant infrastructure.	Allowed in part

	Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
FS45.100	Northpower Limited and Northpower Fibre Limited	283	283.153	Oppose in part	Natural Character – New Rule	DOC does not oppose a rule providing for new infrastructure, however, locating it within wetland, lake and river margins without appropriate assessment to be inappropriate, considering this would not recognise and provide for section 6(a) of the RMA.	Disallowed
FS45.101	Northpower Limited and Northpower Fibre Limited	283	283.163	Oppose in part	Natural Features and Landscapes – New Rule	Consider an RDA activity is too permissive for new infrastructure within an ONL and ONF. It would be more appropriate for this rule to trigger a Discretionary Activity and undergo assessment against the objective and policies of this chapter.	Disallowed in part
FS45.102	Northpower Limited and Northpower Fibre Limited	283	283.171	Oppose in part	CE-O1	Do not support the wording of this policy amendment as it does not give effect to Policy 6 of the NZCPS.	Oppose in part

	Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
<b>FS45.103</b>	Northpower Limited and Northpower Fibre Limited	283	283.172	Oppose in part	Coastal Environment – New policy	Not opposed to providing for activities with operational or functional need to locate in the Coastal Environment, however, there are concerns that this policy could potentially generate adverse effects on section 6(c) matters.	Oppose in part
<b>FS45.104</b>	Northpower Limited and Northpower Fibre Limited	283	283.174	Oppose	CE-R3	Do not support a permitted activity for upgrading regionally significant infrastructure. This does not recognise and provide for section 6(c) of the RMA nor does it give effect to Policy 11 of the NZCPS.	Disallowed
<b>FS45.105</b>	Northpower Limited and Northpower Fibre Limited	283	283.176	Oppose	Coastal Environment – New Rule	Not opposed to creation of a new rule to provide for infrastructure within the coastal environment. However, concerned with the effects associated with these activities particularly in relation to NZCPS Policies 11, 13, and 15.	Disallowed

	Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
FS45.106	Tappenden Holdings Limited	289	289.14	Oppose in part	ECO-R2	Support submitters point that Council should provide identification of indigenous biodiversity across the district, specifically to recognise and provide for s6(c) of the RMA and to avoid inconsistent application on a case-by-case basis as it is applied. However, the request to delete ECO-R2.2 and ECO-R2.4 are opposed.	Disallowed in part
FS45.107	Tappenden Holdings Limited	289	289.35	Oppose	Coastal Environment – New Policy	Unsure what this new policy would achieve, as sections 10, 10A, and 20A of the RMA outlines the provision of existing use rights. This policy would only be activated for changes to an existing activity.	Disallowed

	Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
<b>FS45.108</b>	Transpower New Zealand Limited	292	292.59	Oppose in part	Ecosystems and Indigenous Biodiversity Chapter	Consider it appropriate for this chapter to be amended to give effect to higher order planning documents. However, for activities within the National Grid, I consider bespoke policies should be established within the infrastructure chapter to give effect to the NPSET and NPSIB.	Disallowed in part
<b>FS45.109</b>	Transpower New Zealand Limited	292	292.71	Support in part	CE-P5	Consider it appropriate for a bespoke policy to be established in the infrastructure chapter to give effect to the NPSET and NZCPS.	Allowed in part
<b>FS45.110</b>	Transpower New Zealand Limited	292	292.78	Support in part	ECO-P2	Consider it appropriate for this policy to not apply to the National Grid, as INF-P10 provides a similar management. However, it is considered that INF-10 requires further amendments to give effect to the NPSET, NPSIB and NZCPS.	Allowed in part

	Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
FS45.111	Clarus	309	309.29	Oppose in part	Renewable Electricity Generation New Policy	Concerned with the effects associated with enabling non-electrical renewable energy activities in relation to section 6(c) of the RMA.	Reserves position.
FS45.112	Fuel Companies (BP, Mobil & Z Energy)	311	311.20	Oppose	CL-P2	Do not support the deletion of this policy, as it would create a gap in managing the effects of earthworks, which could adversely impact indigenous biodiversity if left unmanaged.	Disallowed
FS45.113	Mercury NZ	326	326.8	Oppose	REG-P4	Do not support the submitters word changes as separation does not provide a clear measure in comparison to screening or creating a setback.	Disallowed
FS45.114	Mercury NZ	326	326.11	Oppose	REG-P8	Concerned with the submitters wording changes, as repowering of wind and solar farms would occur through existing activities. It is unclear what outcome the submitter has sought.	Disallowed

	Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
FS45.115	Mercury NZ	326	326.19	Oppose	Definition – Community Scale Renewable Electricity Generation Activities	Concerned about this definition sought, as it does not distinguish between what is considered small-scale and community-scale, noting that the REG chapter has separate provisions for each of these activities.	Disallowed in part
FS45.116	Mercury NZ	326	326.21	Oppose	Definition – Large Scale Renewable Electricity Activities	Concerns about the amendments sought to this condition, as it would make it unclear for plan users what the difference between small-scale, community scale and large-scale activities. The NPSREG does not contain a definition for large-scale activities, however, consider it prudent for this to be addressed in the district plan.	Disallowed
FS45.117	New Zealand Transport Agency	330	330.3	Support	Definitions -	Support the inclusion of State highways into this definition as it gives effect to Appendix 3 of the NRPS.	Allowed

	<b>Name of original submitter</b>	<b>Original submitter number</b>	<b>Original submission point number</b>	<b>DG's Position on Submission (Support or oppose)</b>	<b>Provision</b>	<b>Reasons for support or opposition</b>	<b>I seek that the submission be:</b>
<b>FS45.118</b>	Northland Regional Council	332	332.8	Support	REG-R5	Support the inclusion of this setback from all Significant Bird Areas as it recognises and provides for s6(c) of the RMA.	Allowed
<b>FS45.119</b>	Northland Regional Council	332	332.10	Support in part	Ecosystems and Indigenous Biodiversity Provisions	Support the relief to the extent it is consistent with the DG's primary submission.	Allowed in part
<b>FS45.120</b>	Northland Regional Council	332	332.14	Support	ECO-O3	Support the inclusion of pest management in this objective as pest management is a crucial technique towards recognising and providing for section 6(c) of the RMA.	Allowed
<b>FS45.121</b>	Northland Regional Council	332	332.29	Support	New Provisions	Support the inclusion of setbacks from lakes and rivers that have a width greater than 3m in all zones.	Allowed

	Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
<b>FS45.122</b>	Northland Regional Council	332	332.34	Support	Natural Hazards – New Objective	Support the inclusion of this new objective which seeks to manage effects from subdivision, land use and development. This gives effect to higher order planning documents including the NZCPS, and the NRPS.	Allowed
<b>FS45.123</b>	Northland Regional Council	332	332.35	Support in part	Natural Hazards – New Rule	Support the inclusion of this new rule as it provides for Policy 25 of the NZCPS.	Allowed in part
<b>FS45.124</b>	Northland Regional Council	332	332.38	Support in part	Natural Hazards – New Rule	Support the inclusion of a new rule providing for fences and walls in Flood Hazard Areas, as this gives effect to 27 of the NZCPS. However, there are concerns with how this rule will interact with Policy 26 of the NZCPS.	Allowed in part

FS45.125

Name of original submitter	Original submitter number	Original submission point number	DG's Position on Submission (Support or oppose)	Provision	Reasons for support or opposition	I seek that the submission be:
NZ Fairy Tern Trust	333	333.3	Support in part	Ecosystems and Indigenous Biodiversity	Support the intent from the submitter to give effect to the NPSIB. However, the requirement for Councils to map SNAs has been delayed until 2027. Regardless, it is considered appropriate that the s6(c) equivalent of an SNA can be provided as an overlay.	Allowed in part.