

FURTHER SUBMISSION

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Attn: Planning and Policy Team

Via email: districtplanreview@kaipara.govt.nz

Further Submissions on: **Proposed Kaipara District Plan**

Date: 15 December 2025

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

Submission by: Federated Farmers of New Zealand (Northland)

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1. INTRODUCTION

- 1.1 Federated Farmers of New Zealand Inc (Northland) (**Federated Farmers**) welcomes the opportunity to provide further submissions on the Proposed Kaipara District Plan (**Proposed Plan**).
- 1.2 Federated Farmers has an interest in the Proposed 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. It is 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. It represents rural communities, rural contractors and rural butchers who are a part of the Federated Farmers as members.
- 1.5 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.
- 1.6 Federated Farmers made submissions on the Proposed Kaipara District Plan and has been assigned the submitter number S136 as shown on p3 of the summary of submissions document¹ on the Council's website.
- 1.7 Section 2 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. 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.
- 1.8 Federated Farmers wishes to be heard in support of these further submissions.
- 1.9 If others are making a similar submission, Federated Farmers will consider presenting a joint case with them at the hearing.
- 1.10 Federated Farmers could not gain an advantage in trade competition through these further submissions.
- 1.11 Federated Farmers seeks any consequential changes necessary to give effect to the relief sought in each of the individual submission points made
- 1.12 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, *Original Submissions to the Proposed Kaipara District Plan* accessed at <https://www.kaipara.govt.nz/uploads/District%20Plan%20Review/Submissions/DPR%20Original%20Submissions%20table.pdf> on 9 December 2025.

2. FURTHER SUBMISSIONS TO THE PROPOSED KAIPARA DISTRICT PLAN

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Loralie Sheppard FS47.1	2.1	Subdivision Rules – SUB-R3 Subdivision to create new allotments	The submitter seeks the amendment of clause (b) to the rule to ensure that subdivision in the general rule zone does not contain highly productive land or does contain highly productive land but has been determined an exception under clause 3.8 of the National Policy Statement for Highly Productive Land 2022 (NPS-HPL).	Support in part	Federated Farmers submission supported the notified version of the rule. It has concerns that the relief sought by the submitter may unintentionally result in a change in activity classification under the rule which would not be supported.	If the relief sought is granted the Council ensures that the current activity classifications under the rule (being controlled and discretionary) are not changed.
FS47.2	2.2	Subdivision Rules – SUB-R4 Small lot subdivision	The submitter seeks the amendment of the rule to include the relevant provisions of the NPS-HPL so that small lot subdivision is not undertaken on highly productive land or if it is then that land falls within the exemptions provided for in clause 3.8 of the NPS-HPL.	Support in part	Federated Farmers submission supported the notified version of the rule. It has concerns that the relief sought by the submitter may unintentionally result in a change in activity classification under the rule which would not be supported.	That the council if it decides to grant the relief sought, ensures that the current activity classifications under the rule (being controlled and discretionary) are not changed.
Dhivian Govender FS47.3	8.2	General Rural Zone	The submitter sought the amendment of a provision in the zone (which was not specified) to allow lots over 24 hectares to have multiple dwellings for worker accommodation, rental income and / or multi-generational living.	Oppose	The relief sought by the submitter, if granted, has the potential to allow for a number of dwellings in the rural zone, not of which may be related to the rural activities taking place on a property. The rules in the General Rural Zone already provide for visitors accommodation, residential and minor dwellings, papakāinga and communal housing. Allowing for more types of housing increases the risk of reverse sensitivity effects occurring.	Decline the relief sought.

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
Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ FS47.4	26.80	General Rural Zone Standards – GRUZ-S3.2.d	The submitters seeks the deletion of clause d from the standard as the infrastructure chapter already states that zone rules do not apply to infrastructure.	Oppose	The clause adds clarity to the standard by stating infrastructure is exempted. The retention of the clause is unlikely to cause confusion as it is clearly worded and easy to understand.	Decline the relief sought.
Evolve Planning and Landscape Architecture FS47.5	50.1	General	The submitter seeks the deletion of the Proposed Plan and its replacement with the exposure draft plan that was released in 2022.	Oppose	The exposure draft plan was put out for feedback which a number of parties across different industries and sectors provided. This feedback was used to develop the Proposed Plan which is currently being consulted on under s Schedule 1 , RMA process. It is important that any district plan for the district undergoes the proper process for consultation. This is currently the Schedule 1 RMA process which the exposure draft did not go through.	Decline the relief sought.
FS47.6	50.13	General Rural Zone	The submitter seeks the addition of a new clause to deal with rural production land with appropriate rules and apply it to Class 1 and 2 Soils with Class 3 soils covered under the General rural zone.		The inclusion of a rural production zone in the Proposed Plan is not compulsory under the National Planning Standards. ³ A rural production zone is only required to be included if the Council considers that it is relevant to do so.	Decline.
FS47.7	50.16	Subdivision Rules - SUB-R3	The submitter seeks the activity classification is changed from controlled to restricted discretionary or discretionary. It also sought the addition of new assessment criteria to rule in respect of character and amenity	Oppose	Federated Farmers submission sought the retention of the controlled activity classification for the rule. A controlled activity status allows for an appropriate subdivision of land to occur in the	Decline the relief sought.

³ Ministry for the Environment, *National Planning Standards*, Part 4, cl4, p14.

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			values and the amendment of the wording of the rule to incorporate the new criteria requested.		GRUZ without any unnecessary barriers.	
Evolve Planning and Landscape Architecture FS47.8	50.17	Subdivision Rules – SUB-R4	The submitter seeks the activity classification is changed from controlled to restricted discretionary or discretionary along with the addition of new criteria in respect of character and amenity values. Other minor amendments were also sought.	Oppose	Federated Farmers submission sought the retention of the controlled activity classification for the rule. A controlled activity status allows for an appropriate subdivision of land to occur in the GRUZ without any unnecessary barriers.	Decline the relief sought.
FS47.9	50.18	Subdivision Rules - SUB-R5	The submitter seeks the activity classification is changed from controlled to restricted discretionary or discretionary along with the addition of new criteria in respect of character and amenity values.	Oppose	Federated Farmers raised concerns over what was meant by the term 'environmental benefit' subdivision. Concern was also raised around the fact that there was not a clear policy framework to support the rule. The relief sought by the submitter does not provide a policy framework for the rule and seeks to add more criteria into the rule for consideration.	Decline the relief sought.
FS47.10	50.19	Subdivision Rules - SUB-R6	The submitter seeks the activity classification is changed from controlled to restricted discretionary or discretionary along with the addition of new criteria in respect of character and amenity values. Other amendments to the rule are also sought.	Oppose	Federated Farmers raised concerns over what was meant by the term 'environmental benefit' subdivision. Concern was also raised around the fact that there was not a clear policy framework to support the rule. The relief sought by the submitter does not provide a policy framework for the rule and seeks to add more criteria into the rule for consideration.	Decline the relief sought.
FS47.11 FS47.12	50.23 50.24	Natural Features and Landscapes	The submitter sought the addition of more objectives, policies and rules to the Natural Features and Landscapes chapter using Whangarei District Plan as an example.	Oppose	The submitter has provided no proposed wording and refers to another district's plan. It is difficult to ascertain what the submitter is actually seeking and what this would mean if done.	Decline the relief sought.

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Evolve Planning and Landscape Architecture FS47.13	50.25	Natural Features and Landscapes	The submitter sought the amendment of the Natural Features and Landscapes chapter to require the protection of these features through subdivision and development.	Oppose	It is unclear as to what the relief sought would be and what it would mean for parties impacted by it.	Decline the relief sought.
Richard Rickman FS47.14	70.12	Subdivision Rules - SUB-R4	Then submitter seeks the deletion of the rule or its amendment so that the parent lot size is limited to 5 hectares.	Oppose	The rule is intended to address small lot subdivision. Imposing a minimum lot size of 5 hectares for the parent lot would be inconsistent with the intent of the rule.	Decline the relief sought.
FS47.15	70.13	General Rural Zone Objectives – GRUZ-O1	The submitter wants the objective to be amended so that there is better zoning to match existing and consent cadastral patterns.	Oppose	The relief sought appears to be outside of the scope of the objective. The intention of the objective is to outline the purpose of the zone. It does not need to match zones or existing and consented cadastral patterns as these are issues that should be addressed through seeking changes to the planning maps.	Decline relief sought.
Astute Consulting FS47.16	110.15	General Rural Zone Rules - GRUZ-R20	The submitter seeks the amendment of the activity status of GRUZ-R20 Industrial activity to be a discretionary activity from the current non-complying activity it currently has. It also sought the provision of more clarity around what specific industrial activities are provided for.	Oppose	The rural zone is appropriately zoned for rural based activities. Commercial and industrial activities are not rural based activities and should not be able to be located easily in the rural zone at the expense of rural activities.	Decline relief sought.
FS47.17	110.16	General Rural Zone Rules - GRUZ-R19	The submitter seeks the amendment of the activity status of GRUZ-R19 commercial activity to be a discretionary activity from the current non-complying activity it currently has. It also sought the provision of more clarity around what specific industrial activities are provided for.	Oppose	The rural zone is appropriately zoned for rural based activities. Commercial and industrial activities are not rural based activities and should not be able to be located easily in the rural zone at the expense of rural activities.	Decline the relief sought.
Glenn Pope FS47.18	116.3	Earthworks Standards – EW-S4	The submitter seeks the amendment of the standard as well as a note which	Oppose	It is not considered to be appropriate to require activities to meet the	Decline the relief sought.

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			requires best practice erosion and sediment control to be in accordance with an Auckland Council guidance document.		requirements set out in another council's guidance document. The guidance document may not be fit for purpose for erosion and sediment control within the Kaipara district.	
Glenn Pope FS47.19	116.4	Earthworks Standards – EW-S5	The submitter seeks the amendment of the standard as well as a note which requires best practice erosion and sediment control to be in accordance with an Auckland Council guidance document.	Oppose	It is not considered to be appropriate to require activities to meet the requirements set out in another council's guidance document. The guidance document may not be fit for purpose for erosion and sediment control within the Kaipara district.	Decline the relief sought
Horticulture New Zealand FS47.20	140.9	Definitions - Farming	The submitter seeks the deletion of the definition for farming on the basis that it does not support the use of the defined term for horticultural primary production activities.	Oppose	Federated Farmers opposed to the removal of a fundamental definition for activities that occur every day in the rural zone.	Decline the relief sought. Alternatively amend the definition of 'farming' to specifically exclude horticultural activities.
FS47.21	140.59	Subdivision Rules – SUB-R3	The submitter seeks the deletion of subclauses b and c from clause 1 of the rule. It also seeks the deletion of GRUZ from the rule on the basis that there is no functional need for the zone's inclusion. It is also considered that subdivision is more appropriate for the rural lifestyle zone.	Oppose	Appropriate subdivision in the GRUZ should be enabled as long as it is consistent with appropriate legislation and national guidance documents. It is not appropriate to say that subdivision should not be enabled simply because the submitter believes it is better that it occurs in another zone.	Decline the relief sought.
FS47.22	140.60	Subdivision Rules – SUB-R4	The submitter seeks the deletion of the rule as it does not believe subdivision has a functional need to be located within the GRUZ and is not supported by the National Planning Standards. The submitter also opposes subdivision being enabled within the GRUZ as a controlled activity.		It is considered that the Proposed Plan should enable small lot subdivision in the GRUZ where it is appropriate to do so.	Decline relief sought.

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Horticulture New Zealand FS47.23	140.61	Subdivision Rules – SUB-R5	The submitter seeks the deletion of the rule as it opposes the controlled activity status of the rule and the permissive approach that has been taken to rural subdivision.	Oppose	It is considered that it is appropriate to provide for subdivision to create a reserve and incentive lot. Federated Farmers supports the controlled activity status of the rule and asks that it is retained.	Decline the relief sought.	
	FS47.24	140.62	Subdivision Rules – SUB-R6	The submitter seeks the amendment of the activity classification of the rule from controlled to restricted discretionary.	Oppose	The relief sought by the submitter is contrary to what Federated Farmers sought in its submission to the rule.	Decline relief sought.
	FS47.25	140.66	Coastal Environment Policies – CE-P6	The submitter seeks the deletion of the policy on the basis that the assessment of resource is not policy.	Oppose	The relief sought by the submitter is contrary to what Federated Farmers sought in its submission to the policy.	Decline the relief sought.
	FS47.26	140.80	Noise Standards – NOISE-S3	The submitter seeks the deletion of clause 3.1.a.1 from the standard on the basis that noise restrictions should not restrict primary production activities.	Support	Federated Farmers supports the reasons given by the submitter and seeks that primary production activities are not unnecessarily restricted by inappropriate noise restrictions.	Decline relief sought.
	FS47.27	140.91	General Rural Zone Policies - GRUZ-P3	The submitter seeks the amendment of the policy to remove the effects hierarchy of avoid, remedy or mitigate.	Oppose	Federated Farmers does not support the removal of the defined effects hierarchy of avoid, remedy or mitigate from the policy.	Decline the relief sought.
	FS47.28	140.94	General Rural Zone Policies - GRUZ-P6	The submitter seeks the deletion of clauses 6.2 and 6.3 of the policy.	Oppose	The policy talks about providing for limited communal housing opportunities. It is appropriate that a range of communal housing is provided for which the policy did as worded when the Proposed Plan was notified.	Decline the relief sought.
New Zealand Agricultural Aviation Association FS47.29 to FS47.33	146.1 146.2 146.3 146.7 146.13	Definitions	The submitter seeks the inclusion of definitions for: <ul style="list-style-type: none"> • Agricultural Aviation Industry (146.1). • Aircraft (146.2). • Airfield (146.3). • Heliport (146.7). • Rural Airstrip (146.13). 	Support	It is appropriate for the Proposed Plan to include definitions for activities that occur in the district.	Grant the relief sought.	

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FS47.34	146.14		<ul style="list-style-type: none"> Temporary Helicopter Landing (146.14). 			
Royal Forest and Bird Protection Society of New Zealand FS47.35 Incorporated	149.2	Definitions – Vegetation clearance	The submitter seeks the amendment of the definition to address vegetation alternations and clearance as well as amending the definition to refer to the damage or destruction of indigenous vegetation.	Oppose	The relief sought by the submitter is inappropriate as it broadens the scope of what is captured under the definition including unintentional damage to indigenous biodiversity which could result from existing, everyday activities. The expansion of the definition has the potential to restrict lawful, everyday activities and increase compliance costs.	Decline the relief sought.
FS47.36	149.6	Strategic Direction Natural Environment - SD-NE-02	The submitter seeks the amendment of the strategic direction to expand its application to address waterbodies and their margins along with the coastal environment.	Oppose	Federated Farmers queries the interpretation that has been given to ss6 and 7 of the RMA and does not believe the relief that has been sought is appropriate.	Decline relief sought.
FS47.37	149.7	Strategic Direction Natural Environment - New	<p>The submitter seeks the addition of a new Strategic Direction - Natural Environment objective (SD-NE-O4) as follows:</p> <p><u>Subdivision, use and development is managed so the health and well-being of water bodies, freshwater ecosystems, and coastal water quality are maintained and improved (where degraded).</u></p>	Oppose	The relief sought is not an achievable direction. It is well known that it takes a significant period of time for the health and well-being of waterbodies to be improved. The addition of a new strategic direction such as that sought creates an unachievable goal which will, in turn, produced unwarranted barriers to appropriate subdivision, use and development provided for under the RMA.	Decline the relief sought.
FS47.38	149.8	Strategic Direction Natural Environment - New	<p>Add a new Strategic Direction - Natural Environment objective (SD-NE-O5) as follows:</p> <p><u>Our indigenous vegetation cover increases in our urban and non-urban environments.</u></p>	Oppose	The relief sought is broad and will impose requirements on landowners as to what they are required to do with their properties in order to achieve the new objective that has been sought.	Decline relief.

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FS47.39	149.10	Strategic Direction Natural Environment - New	<p>The submitter seeks the addition of a new Strategic Direction - Natural Environment objective (SD-NE-O6) as follows:</p> <p><u><i>Our indigenous species are resilient to the effects of climate change and natural adjustments of habitats, species and ecosystems to the changing climate are supported.</i></u></p>	Oppose	<p>While supporting the intent behind the submission point, Federated Farmers has concerns that the objective itself is not achievable and is heavily dependent on changes being made on bigger scales than just a district scale. To require change to happen on regional, national and potentially international scales is outside the scope and mandate of the Proposed Plan.</p>	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand FS47.40 Incorporated	149.37	Ecosystems and Indigenous Biodiversity	<p>The submitter sought the following:</p> <ul style="list-style-type: none"> The amendment of the identification of Significant Natural Areas into the Proposed District Plan using the criteria in Appendix 5 of the Regional Policy Statement and using comparable approaches as a model, such as the Napier City Council's Ecosystem and Indigenous Biodiversity Plan Variation. <p>OR</p> <ul style="list-style-type: none"> the addition of an objective regarding the identification of areas through new subdivision, use and development proposals using the Regional Policy Statement Appendix 5 criteria; and the addition of a method and provide a specified time limit for identifying significant natural areas across the District and a schedule included within the plan and maps. 	Oppose	<p>As the submitter has pointed out a pause has been placed on the identification of significant natural areas. The relief sought is not considered appropriate for this reason as well as for the unwarranted burden it would place on landowners if carried out.</p>	Decline the relief sought.

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Royal Forest and Bird Protection Society of New Zealand FS47.41 Incorporated	149.38	Ecosystems and Indigenous Biodiversity Objectives – ECO-O1	The submitter seeks the amendment of the objective to refer to the protection from clearance, modification, degradation, fragmentation and inappropriate use, subdivision and development.	Oppose	The relief sought does not add any additional clarity to the objective. An objective is specified outcome or end result. The proposed amendments to the objective are a list of actions which are not appropriate to be setting in an objective.	Decline relief sought.
FS47.42	149.39	Ecosystems and Indigenous Biodiversity	Submitter seeks the addition of new objectives to give effect to the National Policy Statement for Indigenous Biodiversity (NPS-IB).	Oppose	The submitter has not provided any proposed wording for what it has sought. It is difficult to assess the impact of the relief sought as a result.	Decline the relief sought.
FS47.43	149.41	Ecosystems and Indigenous Biodiversity Policies – ECO-P2	The submitter has sought: <ul style="list-style-type: none"> • the amendment of the revised policies to give effect to the RMA including s6(c) and s7(d); and • include cross referencing; and • retain policy ECO-P2.1 as notified; and • amend policy ECO-P2.1.b and ECO-P2.2 as it opposes the policy as it considered it to be too broad.	Oppose	In its submission, Federated Farmers supported the policy as it was notified.	Decline relief sought.
FS47.44	149.42	Ecosystems and Indigenous Biodiversity Policies – ECO-P3	The submitter had sought the amendment of the policy so that it focused on the protection and maintenance of indigenous biodiversity rather than providing for the activities which could conflict with these outcomes. Amendments were also sought to the Proposed Plan to ensure any enabling provisions are clearly subordinate to the overarching protection and maintenance outcomes to give effect to	Oppose	Federated Farmers submission supported the policy as it was notified.	Decline the relief sought.

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			<p>the NPS-IB and Regional Policy Statement.</p> <p>The submitter also sought that the policy be spilt into two or more distinct policies with one dealing with setting out the biodiversity protection and maintenance in line with the NPS-IB and Regional Policy Statement. A separate policy should deal with specific circumstances where limited adverse effects may be acceptable, as set out in the NPS-IB such as established activities or maintenance of improved pasture for farming.</p>			
Royal Forest and Bird Protection Society of New Zealand FS47.45 Incorporated	149.43	Ecosystems and Indigenous Biodiversity Policies – ECO-P4	Submitter seeks the amendment of the policy to give full effect to the NPS-IB and to direct users to an external report on Meeting Regional Significance Policy Criteria.	Oppose	Federated Farmers submission supported the policy as it was notified.	Decline relief sought.
FS47.46	149.44	Ecosystems and Indigenous Biodiversity Rules – ECO-R1	Submitter seeks the retention of the permitted rule approach of rule ECO-R1 for specific purposes only and seeks the deletion of ECO-R1.b, .f and .h. Amendments to the rule as a whole and clauses .j and .l were also sought.	Oppose	Federated Farmers submission sought the retention of rule ECO-R1 as notified in the PDP or with wording with similar intent; and that rule ECO-R1 was relocated into the Earthworks chapter.	Decline the relief sought.
FS47.47	149.45	Ecosystems and Indigenous Biodiversity Rules - New	The submitters sought the addition of a new restricted discretionary Ecosystems and Indigenous Biodiversity rule for clearance and land disturbance that does not meet limit standards.	Oppose	No proposed wording has been provided for the new rule that the submitter seeks. Without this detail it is unclear how the proposed rule will impact.	
FS47.48	149.48	Natural Character Policies – NATC-P2	The submitter sought the amendment of the policy to refer to indigenous biodiversity present.	Oppose	The relief sought by the submitter is inconsistent with the relief sought by Federated Farmers submission to this policy.	Decline relief sought.

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
FS47.49	149.50	Natural Character Rules – NATC-R2	The submitter sought the amendment of the rule to reduce the building and structure area to 10m ² .	Oppose	The proposed amendment effectively means that buildings and structures for everyday farming activities will not be able to occur as a permitted activity and will require consent to be obtained.	Decline the relief sought.
FS47.50	149.53	Natural Character Standards – NATC-S2	Submitter sought the reduction of the permitted cut depth from 2.0m to 0.5m or less.	Oppose	The reduction sought is unrealistic and unworkable. It will result in more resource consents being needed for every day, lawful activities.	Decline relief sought.
FS47.51	149.54	Natural Character Standards – NATC-S3	The submitter seeks the addition of a 500m ² cumulative threshold form vegetation clearance to be measured over a 10 year period.	Oppose	The cumulative threshold sought is unrealistic and unworkable.	Decline the relief sought.
FS47.52	149.56	Natural Features and Landscapes – Policies – NFL-P2	The submitter seeks the amendment of the policy to refer to the avoidance of additional adverse effects on the characteristics, qualities and values of outstanding natural features and outstanding natural landscapes.	Oppose	The relief sought will create confusion as to what is meant by 'additional adverse effects.' The relief sought is also inconsistent to the relief sought by Federated Farmers in its submission.	Decline relief sought.
FS47.53	149.68	Subdivision Overview	The submitter seeks to add a new paragraph into the overview which includes a description of when it believes subdivision would be inappropriate.	Oppose	The consideration of whether a subdivision is appropriate or inappropriate is a matter for the consent authority to determine on a case by case basis. It would not be appropriate to include the example given by the submitter as it implies that the decision has already been made for the consent authority.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand Incorporated FS47.54	149.69	Subdivision Objectives – SUB-O1	The submitter seeks the amendment of the objective to require the consideration of overlays and the site when determining patterns of development.	Oppose	Subdivision is related to land use. It is not related to overlays and their requirements. It is also unclear what the submitter is intending when it refers to the site.	Decline the relief sought.
FS47.55	149.70	Subdivision Objectives – SUB-O3	The submitter seeks the addition of a clause to the rural subdivision objective	Oppose	The purpose of the objective is to state the desired outcome for rural	Decline relief sought.

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			that refers to the protection of significant indigenous biodiversity from fragmentation.		subdivision. It would be inappropriate to include an action in the objective which deals with a separate topic such as indigenous biodiversity.	
Royal Forest and Bird Protection Society of New Zealand FS47.56 Incorporated	149.72	Subdivision Policies – Policy SUB-P2	The submitter seeks the amendment of the policy to reference infrastructure objectives, policies and rules and to include outcomes for the stormwater quality and quantity management.	Oppose	What the submitter has sought is outside the scope of what the subdivision chapter deals with.	Decline the relief sought.
FS47.57	149.74	Subdivision Policies - Policy SUB-P8	The submitter seeks the amendment of the policy to add the following clause: <i><u>Protects areas of significant indigenous vegetation and the habitats of significant indigenous fauna, provides for ecological corridors to maintain and enhance indigenous biodiversity.</u></i>	Oppose	The matter raised by the submitter is better deal with in the ECO chapter and should not be addressed in this chapter.	Decline relief sought.
FS47.58	149.75	Subdivision	Submitter seeks new Subdivision objectives, policies and rules which cover subdivision within the Coastal Environment and where indigenous vegetation and habitats, riparian margins, and Outstanding Natural Features and Landscapes are present. New subdivision objectives should cover outcomes sought for subdivision within these areas or resulting in adverse effects on them. New provisions are also sought that promote increasing indigenous vegetation cover in urban and non-urban environments.	Oppose	The submitter seeks to add a substantial number of new provisions into the chapter without providing any proposed wording. This has the potential to result in new provisions being added without all relevant parties having the opportunity to comment on the impact of the provisions being sought as no wording has been provided.	Decline the relief sought.
FS47.59	149.76	Subdivision	The submitter has sought the addition of new rules and standards to ensure	Oppose	Again, the submitter has not provided any proposed wording for what it is seeking. The lack of wording makes it	Decline the relief sought.

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			that areas that require preservation and protection under s6 of the RMA.		difficult to understand the consequences of what is being sought.	
Royal Forest and Bird Protection Society of New Zealand FS47.60 Incorporated	149.78	Coastal Environment Objectives – CE-O3	The submitter seeks the amendment of the objective to include elements that contribute to natural character as identified in Policy 13(2) of the New Zealand Policy Statement.	Oppose	The submitter has not provided any proposed wording for what it is seeking. The lack of wording makes it difficult to understand the consequences of what is being sought.	Decline the relief sought.
FS47.61	149.80	Coastal Environment	The submitter seeks the inclusion of new objectives and policies that give effect to the Coastal Environment chapter following the identified New Zealand Coastal Policy Statement policies.	Oppose	The submitter seeks to add a substantial number of new provisions into the chapter without providing any proposed wording. This has the potential to result in new provisions being added without all relevant parties having the opportunity to comment on the impact of the provisions being sought as no wording has been provided.	Decline the relief sought.
FS47.62	149.81	Coastal Environment Policies – CE-P1	The submitter seeks that the reference to land use and development is changed to activities throughout the policy.	Oppose	The RMA refers to subdivision, land use and development. It is important to use wording that is consistent with the RMA as the current resource management legislation.	Decline relief sought.
FS47.63	149.82	Coastal Environment Rules – CE-R2	The submitter seeks that restrictions are included in the rule to limit structures for regionally significant infrastructure to a gross floor area of 10m ² and height of 2m.	Oppose	The restrictions sought as to gross floor area and height for regionally significant structure are inappropriate and contradicts the intent of the rule as a whole by singling out certain infrastructure over others.	Decline the relief sought.
FS47.64	149.88	Earthwork Policies – EW-P1	The submitter sought the amendment of EW-P1 by adding an additional clause as follows: <i><u>Appropriate management of any adverse effects on the environment.</u></i>	Oppose	The relief sought is inconsistent with the relief sought by Federated Farmers in its submission to this policy. The relief sought is also extremely broad is what is sought and confusion may be cause over what is considered to be appropriate management.	Decline relief sought.

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
FS47.65	149.91	Earthwork Policies – EW-P4	The submitter seeks the addition of new clauses to the policy 4 outlining what rehabilitation plans must cover and the outcomes sought.	Oppose	The submitter seeks to add new clauses without providing any proposed wording. This has the potential to result in new provisions being added without all relevant parties having the opportunity to comment on the impact of the provisions being sought as no wording has been provided.	Decline the relief sought.
Royal Forest and Bird Protection Society of New Zealand FS47.66 Incorporated FS47.67	149.92	Earthwork Rules	The submitter seeks the amendment of earthwork rules so that they do not apply to overlays and rules where protection is required.	Oppose	Federated Farmers does not support the relief sought by the submitter.	Decline relief sought.
	149.93	Earthwork Rules – EW-R2	The submitter seeks either the deletion of the rule or its amendment.	Oppose	Federated Farmers submission sought the retention of the rule. It opposes the deletion of the rule as well as its amendment without any proposed wording being provided for consideration.	Decline the relief sought.
FS47.68	149.94	Earthwork Rules – EW-R3	The submitter seeks the addition of setbacks for farm quarries from areas of indigenous vegetation.	Oppose	The relief sought is impractical and unwarranted.	Decline relief sought.
FS47.69	149.101	Noise Objectives	The submitter seeks the addition of a new noise objective that states that noise is managed to protect indigenous biodiversity	Oppose	The new objective sought is absolute in its nature and does not acknowledge that not all noise will be able to be managed to achieve the desired outcome of ‘protection.’ In addition, some activities may have been lawfully established before indigenous biodiversity established itself in that area.	Decline the relief sought.
FS47.70	149.103	Noise – Matters of Discretion – NOISE – MAT 1	The submitter seeks the addition of new matters of discretion in NOISE – MAT 1	Oppose	Federated Farmers does not support what the submitter is seeking as it has the potential to create severe barriers to everyday activities that are necessary within the general rural zone.	Decline relief sought.

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Royal Forest and Bird Protection Society of New Zealand FS47.71 Incorporated	149.109	General Rural Zone Objectives - Overview	Submitter seeks additions to the overview of the GRUZ chapter.	Oppose	The relief sought seeks to broaden the overview to the GRUZ chapter so that indigenous biodiversity becomes the paramount consideration which is inappropriate. The Council has already addressed its responsibilities for ecosystems and indigenous biodiversity in the ECO chapter which is the appropriate place to do so.	Decline.
FS47.72	149.111	General Rural Zone Objectives - New	The submitter seeks the addition of two new objectives to refer to the maintenance and restoration of indigenous biodiversity in the GRUZ zone.	Oppose	The Council has already addressed its responsibilities for ecosystems and indigenous biodiversity in the ECO chapter which is the appropriate place to do so	Decline the relief sought.
FS47.73	149.112	General Rural Zone Policies - New	The submitter seeks the addition of two new policies to refer to the maintenance and restoration of indigenous biodiversity in the GRUZ zone.	Oppose	The Council has already addressed its responsibilities for ecosystems and indigenous biodiversity in the ECO chapter which is the appropriate place to do so	Decline relief sought.
FS47.74	149.113	General Rural Zone Policies – GRUZ-P2	The submitter seeks significant amendments to the policy to remove acceptance of the effects caused by primary production.	Oppose	It is felt that the submitter is seeking to remove the intent behind the use of the use of the general rural zone which is to enable primary production activities to occur in an appropriate place such as the rural environment.	Decline relief sought.
FS47.75	149.114	General Rural Zone Policies – New	The submitter seeks the addition of a new policy that enables primary production only where adverse effects are avoided, remedied or mitigated.	Oppose	The submitter is seeking to remove the intent behind the use of the use of the general rural zone which is to enable primary production activities to occur in an appropriate place such as the rural environment.	Decline.
FS47.76	149.115	General Rural Zone Policies – GRUZ-P5	Submitter seeks a new addition to the policy to provide for the maintenance or restoration of indigenous biodiversity in the GRUZ.	Oppose	The submitter is seeking to remove the intent behind the use of the use of the general rural zone which is to enable primary production activities to occur in	Decline the relief sought.

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
			It is also sought that the maintenance and restoration of indigenous biodiversity in the GRUZ is provided for over and above the availability and productive capacity of highly productive land.		an appropriate place such as the rural environment.	
	FS47.77					
Royal Forest and Bird Protection Society of New Zealand Incorporated	149.116 149.117 FS47.78	General Rural Zone Rules - New	Submitter seeks additional rules to limit the volume of indigenous vegetation clearance and associated land disturbance with a standard allowing only up to 50m ² of area to be disturbed as well as introducing a new restricted discretionary activity rule for indigenous vegetation clearance and associated land disturbance.	Oppose	The relief sought is not considered to be appropriate for activities within the GRUZ. Primary production can only occur in certain locations such as the GRUZ due to soil and land types. The relief sought will unnecessarily restrict every day activities from occurring in a zone that is intended to provide for primary production activities.	Decline relief sought.
FS47.79 FS47.80 FS47.81	149.136 149.137 149.138	Infrastructure Policies – INF-P2, INF-P3 and INF-P4	The submitter seeks the amendment of the policies to expressly recognise that infrastructure must be located and designed to avoid, remedy, or mitigate adverse effects on the environment and significant values.	Oppose	The relief sought seeks to limit the ability for where infrastructure can be located and how it is designed.	Decline the relief sought.
FS47.82 FS47.83 FS47.84	149.149 149.150 149.51	Natural Character Rules – NATC-R2, NATC-R3 and NATC-R4	Submitter seeks the addition of matters of discretion to address natural character effects where performance standards are not met.	Oppose	No wording has been provided so it has been impossible to assess what the proposed impact of the relief sought would be.	Decline the relief sought.
Cato Bolam Consultants Limited FS47.85	217.43	Ecosystems and Indigenous Biodiversity Rules – ECO-R1	Submitter seeks to reduce the clearance setback and the volume of clearance provided for as a permitted activity.	Oppose	The relief sought is unnecessarily restrictive and does not take account of the realities of everyday activities and operations.	Decline relief sought.
FS47.86	217.44	Ecosystems and Indigenous Biodiversity Rules – ECO-R2	Submitter seeks the amendment of the rule to reduce the size of the permitted clearance area of indigenous vegetation per year and to increase the time limit over which clearance is measured.	Oppose	Federated Farmers does not support a reduction in the size of the permitted clearance area and increasing the time limits over which the clearance can occur. The relief is overly restrictive.	Decline.

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
FS47.87 FS47.88	217.153 217.155	General Rural Zone Rules – GRUZ-R1.3 and GRUZ-R3	Submitter seeks to change the activity classification from discretionary to non-complying.	Oppose.	No justification has been given to the change in activity reclassification sought by the submitter.	Decline the relief sought.
Kaipara District Council FS47.89	222.14	General Rural Zone Rules - New	Add a new rule to the General rural zone as follows: <i>GRUZ-RX Demolition of a building</i> <i>1. Activity status: Permitted</i> <i>2. Activity Status when compliance not achieved: Not applicable</i>	Support	The addition of the new rule is supported by Federated Farmers and is a logical solution to a common issue in the GRUZ.	Grant the relief sought.
FS47.90	222.26	General Rural Zone Rules - New	The submitter seeks the inclusion of a new permitted activity rule for the relocation of buildings with the appropriate standards in the GRUZ.	Support	The addition of the proposed new rule is supported.	Grant relief sought.
Khans Developments and Investments Limited FS47.91	249.13	General Rural Zone Policies – GRUZ-P1	Submitter seeks the amendment of the policy to refer to commercial and industrial activities.	Oppose	The purpose of the general rural zone is to enable primary production and associated activities. Commercial and industrial activities can be located in other, more appropriate zones. Primary production can only occur in the rural zone and the zone should be protected from other non-necessary activities.	Decline the relief sought.
FS47.92	249.15	General Rural Zone Policies – GRUZ-P5	Submitter seeks the amendment of the policy to enable non rural activities to occur in the general rural zone.	Oppose.	The purpose of the general rural zone is to enable primary production and associated activities. Commercial and industrial activities can be located in other, more appropriate zones. Primary production can only occur in the rural zone and the zone should be protected from other non-necessary activities.	Decline relief sought.
Environmental Defence Society FS47.93 FS47.94	265.3 265.4	Ecosystems and Indigenous Biodiversity Natural Character	The submitter seeks the amendment of the Ecosystems and Indigenous Biodiversity chapter to give effect to national direction and regional planning instruments / amend the Natural	Oppose	No proposed wording has been provided by the submitter so it has been impossible to assess how the relief sought would impact.	Decline the relief sought.

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
FS47.95 FS47.96 FS47.97	265.5 265.6 265.7	Natural Features and Landscapes Public Access Coastal Environment	Character chapter / amend the Natural Features and Landscapes chapter / amend the Public Access chapter / Coastal Environment AND Retain the integrity of natural environment mapping Outstanding Natural Landscape, Outstanding Natural Feature, High Natural Character Area and Outstanding Natural Character Area. AND Amend relevant objectives, policies, rules and standards to ensure planning outcomes are achieved which will not jeopardise the integrity of Kaipara's natural environment			
Heritage New Zealand Pouhere Taonga FS47.98	270.56	Earthworks Rules	The submitter seeks that an archaeological assessment is undertaken for any proposed farm quarry site prior to earthworks commencing.	Oppose	The relief sought by the submitter has the potential to create significant barriers to the development of farm quarries. It should not be compulsory for an assessment to be done and whether or not one is necessary should be assessed on a case by case basis.	Decline the relief sought.
Marunui Conservation Limited FS47.99 FS47.100	278.25 278.26	Subdivision Standards	The submitter seeks the amendment of standard SUB-S14.4 and SUB-S16, Table 1, Column 2 to change the activity classification from discretionary to non-complying.	Oppose	The relief that has been sought is unnecessary as the notified version of the standard deals with any potential issues effectively.	Decline the relief sought.
Vermont Street Partners Limited FS47.101	293.19	General Rural Zone Policies – GRUZ-P4	Submitter seeks the amendment of the policy to focus on managing amenity values in respect of buildings and structures only.	Oppose	Federated Farmers supported the intent of the policy and sought amendments to make the policy clearer and easier to understand.	Decline the relief sought.

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
					The relief sought does not support the intent behind the policy and seeks to narrow the focus of the policy down to a single issue.	
Vermont Street Partners Limited FS47.102 FS47.103 FS47.104	293.20 293.21 293.22	General Rural Zone	Submitter seeks the inclusion in the Proposed Plan of a zone that provides for rural residential type development on land that no longer has productive ability.	Oppose	It is not considered to be appropriate to use rural land for residential development. No proposed wording has been provided by the submitter so it has been impossible to assess the potential impacts of the relief sought.	Decline.
Director General of Conservation FS47.105	304.1	Statutory Context	The submitter seeks that the Proposed Plan is amended to record that 'Significant Indigenous Vegetation and Habitats of Kaipara District, Northland – Volume 1' has been considered in development of the proposed Kaipara district plan. AND The addition of objectives, policies and rules which recognise and promote the protection of significant indigenous vegetation and significant habitats of indigenous fauna based on the document 'Significant Indigenous Vegetation and Habitats of Kaipara District, Northland - Volume 1'.	Oppose	As no proposed wording has been provided by the submitter it is unclear exactly what the relief sought will look like. This has made it impossible to assess any likely impacts from the relief sought being granted. In addition, the document referred to is part of the section 32 report information that supports the Proposed Plan.	Decline the relief sought.
FS47.106 FS47.107 FS47.108 FS47.109 FS47.110	304.5 304.11 304.12 304.14 304.34	Definitions	The submitter has sought the inclusion of a number of new definitions in the Proposed District Plan.	Oppose	It is unclear where the definitions have been taken from and is difficult to ascertain the impact they may have on the provisions of the Proposed District Plan.	Decline relief sought.

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Director General of Conservation FS47.111	304.35	Strategic Direction Vision of Kaipara	The submitter seeks the amendment of the chapter to include the protection, maintenance and enhancement of indigenous biodiversity.	Oppose	The submitter has not provided any proposed wording as to what the amendments to the chapter would look like.	Decline the relief sought.
FS47.112	304.63	Ecosystems and Indigenous Biodiversity	Amendment sought to include information from an study undertaken by an external consultant to map areas provided for under s6(c) of the RMA.	Oppose	It is not considered appropriate to include areas of significant indigenous vegetation and significant habitats of indigenous fauna without that information going through the required Schedule 1, RMA process.	Decline relief sought.
FS47.113	304.65	Ecosystems and Indigenous Biodiversity Objectives – ECO-O2	The submitter seeks the deletion of the objective and tis replacement with a new objective that requires a minimum of no net loss in indigenous biodiversity.	Oppose	Federated Farmers does not support the inclusion of an objective that it written in such absolute terms.	Decline the relief sought.
FS47.114	304.67	Ecosystems and Indigenous Biodiversity Policies – Policy ECO-P1	The submitter seeks the amendment of the policy so that it requires the protection of indigenous biodiversity within the coastal environment.	Oppose	The relief sought is not supported due to the fact it changes the intent of the policy from what was notified.	
FS47.115	305.68	Ecosystems and Indigenous Biodiversity Policies – Policy ECO-P2	Amend the policy to reflect the prioritisation of protecting areas of significant vegetation and significant habitats of indigenous fauna.	Oppose	The amendments sought have not added clarity to the policy and have instead created confusion over what is being sought. The relief sought is not supported.	Decline the relief sought.
FS47.116	304.69	Ecosystems and Indigenous Biodiversity Policies – Policy ECO-P3	The submitter has sought the amendment of the policy to remove reference to existing primary production activities on highly productive soils.	Oppose	Federated Farmers is concerned that the removal of the reference to existing primary production activities will have substantial consequences in these activities being able to continue.	Decline relief sought.
FS47.117	304.71	Ecosystems and Indigenous Biodiversity Policies – New	The submitter seeks the addition of a new policy into the chapter to address areas of significant indigenous biodiversity	Oppose	Then relief sought is unnecessary and does not add clarity to the ECO chapter. It has the potential to act as a barrier for appropriate land use and development.	Decline.

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Director General of Conservation FS47.118	304.72	Ecosystems and Indigenous Biodiversity	The submitter seeks that rules ECO-R1 and ECO-R2 have immediate legal effect.	Oppose	It is the statutory responsibility of the Council to state what rules in the Proposed Plan have immediate legal effect under the RMA.	Decline the relief sought.
FS47.119	304.74	Ecosystems and Indigenous Biodiversity Rules – ECO-R2	Amendment sought to reduce the area of clearance permitted or to require a report to be done before clearance can occur.	Oppose	The proposed amendments are impractical in reality and have the potential to become significant barriers to every day activities occurring.	Decline relief sought.
FS47.120	304.78	Natural Character Objectives - New	The submitter seeks the inclusion of a new objective that reads: <i><u>Land use and subdivision is consistent with and does not compromise the characteristics and qualities of the natural character of wetland, lake and river margins.</u></i>	Oppose	The matter outlined in the proposed new objective has already been addressed in objective NATC-O1. It is considered unnecessary for duplication to occur.	Decline the relief sought.
FS47.121	304.96	Subdivision Objectives - New	The submitter seeks the addition of a new objective focused on the protection and enhancement of the district's valued features and environment.	Oppose	The relief sought seeks to elevate one potential outcome of subdivision over others. There are many reasons why subdivision occurs and the subdivision process should not be able to be used as a proxy means of requiring protection and enhancement of features and environments.	Decline.
FS47.122	304.97	Subdivision Objectives - New	The submitter seeks a new objective to require subdivision to be designed and to occur in a way that avoids, remedies or mitigates adverse effects on the environment.	Oppose	The process of subdivision is a desk based exercise that requires lines to be drawn on a certificate of title to create new allotments. The process itself does not have the ability to create any adverse effects on the environment. Effects can potentially occur as a result of the land use and / or development enabled as a result of the subdivision.	Decline the relief sought.

Submitter	Sub No. ²	Plan Section	Submission Point Made	Support / Oppose	Reasons for further submission made	Relief sought
Director General of Conservation FS47.123	304.98	Subdivision Policies – SUB-P5	The deletion of the exceptions from the policy has been sought by the submitter.	Oppose	The policy as notified in the Proposed Plan provides for exceptions as to when esplanade reserves are required. The exceptions are common sense and show that it will not always be possible to create a reserve in some situations. The removal of the exceptions will not change this fact.	Decline relief sought.
FS47.124	304.103	Subdivision Standards – SUB-S14	The submitter has sought the addition of a new clause to the standard that addresses significant indigenous vegetation or habitat, natural wetland or mobile duneland.	Oppose	What the submitter has sought goes beyond the scope of the standard which addresses subdivision of a site within a natural character, coastal environment, outstanding natural feature or outstanding natural landscape overlay. The relief sought is not supported by Federated Farmers.	Decline the relief sought.
FS47.125	304.104	Subdivision Standards – SUB-S16	The submitter seeks the deletion of the standard as notified and its replacement with the approach used in the Proposed Whangarei District Plan.	Oppose	Whangarei is a predominantly urban area and the approach its Council has used may not be appropriate for a district that is predominantly rural.	Decline.
FS47.126	304.107	Coastal Environment Objectives – CE-O1	The submitter has sought the amendment of the objective to refer to outstanding natural character areas, natural character areas and other areas of the coastal environment.	Oppose	The relief sought substantially broadens the scope of the objective and may have unintentional consequences on landowners as a result.	Decline the relief sought.
Clarus FS47.127 FS47.128	309.88 309.90	General Rural Zone General Rural Zone Policies – GRUZ-P5	Remove the use of the term 'non-rural.' Delete the use of the term 'non-rural' from the policy and replace it with "activities that are not dependent on the land resource."	Oppose	The submitter's desire not to use the term 'non-rural' has resulted in the use of terminology that is long and lacks clarity.	Decline the relief sought.
FS47.129	309.89	General Rural Zone Objectives – GRUZ-O1	Then submitter seeks provisions to enable non-primary production activities that rely on a rural location where appropriate.	Oppose	The proposed wording is clumsy and has the ability to use beyond what the submitter is trying to achieve.	Decline relief sought.