

Proposed Kaipara District Plan

Summary of Submissions

This document contains a summary of decisions requested by persons making submissions on the Proposed Kaipara District Plan in accordance with clause 7 of Schedule 1 of the Resource Management Act. The summary of decisions requested for Light was notified on 21 October 2025 and those submissions are therefore not included in this document.

Important Notes

- Where submissions are unclear, the summary of decisions requested contain the word *inferred*.
- This summary is **not a substitute** for reading the full submission. If you think your interests may be affected, please review the full submission online here: [PDP Submissions](#) - submissions are also available for viewing online at our offices and libraries in **Dargaville** or **Mangawhai**.
- Submission point numbers may not be sequential due to quality assurance checks.
- Submission numbers are unique identifiers and must be stated when making a further submission.

Guide to the Summary of Submissions

- Decisions are organized by provision number.
- Where specific wording changes have been requested in submissions, those changes shown as:
 - Underlined = new wording
 - ~~Strikethrough~~ = deletions

How to Make a Further Submission

- From 1 December to 15 December 2025, you can:
 - **Save time! Complete our easy online Form 6 here:** [PDP Online Form 6](#)
 - OR
 - **Download a pdf version of Form 6:** [Form 6 pdf version](#)
- THEN
- **Email it to:** districtplanreview@kaipara.govt.nz
- **Post it to:** Planning and Policy Team, Kaipara District Council, Private Bag 1001, Dargaville 0340
- **Deliver it to either Council office:** 32 Hokianga Road, Dargaville or 6 Molesworth Drive, Mangawhai

Deadline: Further submissions close at 5:00pm on Monday 15 December 2025.

Important: You must send a copy of your further submission to the original submitter **within 5 working days** of lodging it with Kaipara District Council. To access a list containing Submitter Contact Details, click [here](#).

Disclaimer:

This summary of submissions has been prepared and published in accordance with the Resource Management Act to assist the public in understanding the points raised by submitters. Kaipara District Council has used its best endeavours to accurately summarise the relief sought in the submissions, however, we cannot guarantee the accuracy or completeness of the information provided in this document.

Users are advised to take specific independent professional advice before taking any action as a result of information contained in this summary.

Please note that all original submissions and names of submitters are publicly available on the Council website. Submitters should read the full submission for themselves.

Proposed Kaipara District Plan

Summary of Submissions for the topic of: Ecosystems and Indigenous Biodiversity (in Provision order)

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
149.38	Royal Forest and Bird Protection Society of New Zealand Incorporated	ECO-O1	Amend	AMEND ECO-O1 as follows: Areas of significant indigenous vegetation and significant habitats of indigenous fauna are protected <u>from clearance, modification, degradation, fragmentation, and inappropriate use, subdivision, and development.</u> AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> The submitter supports the direction of this provision but considers it could benefit from further clarity. It is not clear what pressures or activities the values are to be protected from. As such, the submitter requests that ECO-O1 is amended to reference the type of activities from which significant indigenous vegetation and significant habitats of indigenous fauna should be protected. This will result in the objective being clear, directive and ultimately better aligned with outcomes anticipated under the Resource Management Act and National Policy Statement for Indigenous Biodiversity.
283.146	Northpower Limited and Northpower Fibre Limited	ECO-O1	Amend	AMEND ECO-O1 as follows: "Areas of significant indigenous vegetation and significant habitats of indigenous fauna are protected, <u>while enabling the safe and efficient use, development, maintenance, operation and upgrading of infrastructure.</u> " AND Any further necessary consequential amendments required.	<ul style="list-style-type: none"> It is important that the protection of significant indigenous vegetation and significant habitats of indigenous fauna is balanced with enabling the safe and efficient use, development, maintenance, operation and upgrading of infrastructure and network utilities. It is important that a policy implements an objective.
332.12	Northland Regional Council	ECO-O1	Amend	AMEND ECO-O1 as follows: Areas of significant indigenous vegetation and significant habitats of indigenous fauna are protected <u>for current and future generations.</u>	<ul style="list-style-type: none"> As drafted, Ecosystems and Indigenous Biodiversity Objectives do not reflect the overall biodiversity outcomes outlined in the Northland Regional Policy Statement. These outcomes being the maintenance and, where possible, enhancement of biodiversity values.
136.48	Federated Farmers of New Zealand (Inc) - Northland Province	ECO-O1	Support	RETAIN ECO-O1 as notified. OR Wording with similar intent.	<ul style="list-style-type: none"> Supports objective ECO-O1 as notified.
289.11	Tappenden Holdings Limited	ECO-O1	Support	RETAIN ECO-O1 as notified. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The objectives appropriately seek to protect, promote and enable the restoration of indigenous biodiversity.
300.13	Bream Tail Residents Association Incorporated	ECO-O1	Support	RETAIN ECO-O1. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The objectives appropriately seek to protect, promote and enable the restoration of indigenous biodiversity.
304.64	Director General of Conservation	ECO-O1	Support	RETAIN ECO-O1 as notified. AND Any further or alternative relief to like effect to that sought.	<ul style="list-style-type: none"> Supports ECO-O1 as it recognises and provides for Section 6(c) Resource Management Act.
216.59	Cabra Mangawhai Ltd & Pro Land Matters Ltd	ECO-O2	Amend	AMEND ECO-O2 and associated provisions to clearly state what the reference point for 'maintaining overall biodiversity' is, and how this is to be measured e.g. no reduction in the area of SNA, no degradation of water quality in rivers, streams and coastal waters.	<ul style="list-style-type: none"> The submitter has requested the resolution above, because the reference point has not been stated, and it is not clear how this policy/provisions should be measured.
257.24	Piroa Conservation Trust	ECO-O2	Amend	AMEND ECO-O2 as follows: Adverse effects on indigenous biodiversity are managed to maintain it's the extent and diversity <u>of indigenous ecosystems and habitats in a way that provides for the social, economic and cultural well-being of people and communities.</u>	<ul style="list-style-type: none"> Emphasis should be on maintaining indigenous biodiversity for its own intrinsic values as per Section 7(d) Resource Management Act.
272.28	J & C Hawley	ECO-O2	Amend	AMEND ECO-O2 as follows: Adverse effects on indigenous biodiversity are managed to maintain it's <u>the extent and diversity of indigenous ecosystems and habitats in a way that provides for the social, economic and cultural well-being of people and communities.</u>	<ul style="list-style-type: none"> Emphasis should be on maintaining indigenous biodiversity for its own intrinsic values as per Section 7(d) Resource Management Act.
278.27	Marunui Conservation Ltd	ECO-O2	Amend	AMEND ECO-O2 as follows: Adverse effects on indigenous biodiversity are managed to maintain it's <u>the extent and diversity of indigenous ecosystems and habitats in a way that provides for the social, economic and cultural well-being of people and communities.</u>	<ul style="list-style-type: none"> Emphasis should be on maintaining indigenous biodiversity for its own intrinsic values as per Section 7(d) Resource Management Act.
332.13	Northland Regional Council	ECO-O2	Amend	AMEND ECO-O2 as follows: Adverse effects on indigenous biodiversity are managed to maintain its extent and diversity <u>in a way that provides for the</u>	<ul style="list-style-type: none"> As drafted, Ecosystems and Indigenous Biodiversity Objectives do not reflect the overall biodiversity outcomes outlined in the Northland Regional Policy

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Summary of Submissions for the topic of: Ecosystems and Indigenous Biodiversity (in Provision order)

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				social, economic and cultural well-being of people and communities.	<p>Statement. These outcomes being the maintenance and, where possible, enhancement of biodiversity values.</p> <ul style="list-style-type: none"> The submitter requests ECO-02 is amended to avoid duplication with SD-VK-01 and SD-VK-02 and reflect the Northland Regional Policy Statement's policy direction on biodiversity values.
304.65	Director General of Conservation	ECO-02	Oppose	<p>DELETE ECO-02 and replace with the following: <u>Biodiversity in the Kaipara District is maintained, and where practicable enhanced so that there is at least no overall loss in indigenous biodiversity.</u> AND Any further or alternative relief to like effect to that sought.</p>	<ul style="list-style-type: none"> As drafted, ECO-02 does not give effect to the National Policy Statement for Indigenous Biodiversity. The submitter requests the objective replaced with wording in alignment with the National Policy Statement for Indigenous Biodiversity to maintain indigenous biodiversity at a district level.
136.49	Federated Farmers of New Zealand (Inc) - Northland Province	ECO-02	Support	<p>RETAIN ECO-02 as notified. OR Wording with similar intent. AND Any consequential amendments.</p>	<ul style="list-style-type: none"> Supports the objective ECO-02 as notified.
289.60	Tappenden Holdings Limited	ECO-02	Support	<p>RETAIN ECO-02 as notified. AND Any consequential amendments or alternative relief to address the matters raised in the submission.</p>	<ul style="list-style-type: none"> The objectives appropriately seek to protect, promote and enable the restoration of indigenous biodiversity.
300.77	Bream Tail Residents Association Incorporated	ECO-02	Support	<p>RETAIN ECO-02. AND Any consequential amendments or alternative relief to address the matters raised in the submission.</p>	<ul style="list-style-type: none"> The objectives appropriately seek to protect, promote and enable the restoration of indigenous biodiversity.
257.25	Piroa Conservation Trust	ECO-03	Amend	<p>AMEND ECO-03 as follows: ECO-03 Restoring and enhancing indigenous biodiversity ecosystems and habitats The restoration <u>and enhancement</u> of indigenous biodiversity is promoted and enabled to <u>reduce the threat status of threatened and at risk species.</u></p>	<ul style="list-style-type: none"> Aligns with the Northland Regional Policy Statement and the submitter's own goals.
272.29	J & C Hawley	ECO-03	Amend	<p>AMEND ECO-03 as follows: ECO-03 Restoring and enhancing indigenous biodiversity ecosystems and habitats The restoration <u>and enhancement</u> of indigenous biodiversity is promoted and enabled to <u>reduce the threat status of threatened and at risk species.</u></p>	<ul style="list-style-type: none"> Aligns with the Northland Regional Policy Statement and the submitter's own goals.
278.28	Marunui Conservation Ltd	ECO-03	Amend	<p>AMEND ECO-03 as follows: ECO-03 Restoring and enhancing indigenous biodiversity ecosystems and habitats The restoration <u>and enhancement</u> of indigenous biodiversity is promoted and enabled to <u>reduce the threat status of threatened and at risk species.</u></p>	<ul style="list-style-type: none"> Aligns with the Northland Regional Policy Statement and the submitter's own goals.
332.14	Northland Regional Council	ECO-03	Amend	<p>AMEND ECO-03 as follows: Restoring indigenous biodiversity <u>and managing pests</u> The restoration of indigenous biodiversity <u>and management of pest species</u> is promoted and enabled.</p>	<ul style="list-style-type: none"> As drafted, Ecosystems and Indigenous Biodiversity Objectives do not reflect the overall biodiversity outcomes outlined in the Northland Regional Policy Statement. These outcomes being the maintenance and, where possible, enhancement of biodiversity values. The submitter requests ECO-03 is amended to acknowledge the importance of preventing and managing pests.
136.50	Federated Farmers of New Zealand (Inc) - Northland Province	ECO-03	Support	Supports the objective ECO-03 as notified.	
146.24	New Zealand Agricultural Aviation Association	ECO-03	Support	RETAIN ECO-03 as notified.	<ul style="list-style-type: none"> Restoring indigenous biodiversity has both social and economic benefits.
289.61	Tappenden Holdings Limited	ECO-03	Support	<p>RETAIN ECO-03 as notified. AND Any consequential amendments or alternative relief to address the matters raised in the submission.</p>	<ul style="list-style-type: none"> The objectives appropriately seek to protect, promote and enable the restoration of indigenous biodiversity.

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289.62	Tappenden Holdings Limited	ECO-O3	Support	RETAIN ECO-O4 as notified. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The objectives appropriately seek to protect, promote and enable the restoration of indigenous biodiversity.
300.78	Bream Tail Residents Association Incorporated	ECO-O3	Support	RETAIN ECO-O3. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The objectives appropriately seek to protect, promote and enable the restoration of indigenous biodiversity.
332.15	Northland Regional Council	ECO-O4	Amend	AMEND ECO-O4 as follows: Landowners act as stewards <u>and tangata whenua as kaitiaki</u> in the protection, maintenance and restoration of indigenous biodiversity.	<ul style="list-style-type: none"> As drafted, Ecosystems and Indigenous Biodiversity Objectives do not reflect the overall biodiversity outcomes outlined in the Northland Regional Policy Statement. These outcomes being the maintenance and, where possible, enhancement of biodiversity values.
136.51	Federated Farmers of New Zealand (Inc) - Northland Province	ECO-O4	Support	RETAIN ECO-O4 as notified. OR Wording with similar intent. AND Any consequential amendments.	<ul style="list-style-type: none"> Supports the objective ECO-O4 as notified.
300.79	Bream Tail Residents Association Incorporated	ECO-O4	Support	RETAIN ECO-O4. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The objectives appropriately seek to protect, promote and enable the restoration of indigenous biodiversity.
149.40	Royal Forest and Bird Protection Society of New Zealand Incorporated	ECO-P1	Amend	AMEND ECO-P1.1. to include or list of all New Zealand Coastal Policy Statement Policy 11(a) matters. AND AMEND ECO-P1.2. to include or list of all New Zealand Coastal Policy Statement Policy 11(b) matters. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> The submitter supports ECO-P1 in part, but requests that the full scope of the NZ Coastal Policy Statement (NZCPS) Policy 11 should be included in ECO-P1. As proposed, ECO-P1 does not feature the full suite of NZCPS matters, nor the effects management required. Therefore, ECO-P1 does not give effect to the NZCPS and requires amendment.
216.58	Cabra Mangawhai Ltd & Pro Land Matters Ltd	ECO-P1	Amend	AMEND ECO-P1 to identify what 'major impacts' are in coastal areas.	<ul style="list-style-type: none"> No reasons provided.
292.60	Transpower New Zealand Limited	ECO-P1	Amend	AMEND ECO-P1 to clarify that it does not apply to the National Grid. OR AMEND ECO-P1 to appropriately recognise the National Grid and give effect to the National Policy Statement on Electricity Transmission. AND Alternative or consequential relief as may be necessary to fully achieve the relief sought by the submission.	<ul style="list-style-type: none"> As drafted, ECO-P1 would apply to the National Grid and there is no reconciliation with the National Grid specific policy INF-P10, or any other policies in the Infrastructure chapter.
304.67	Director General of Conservation	ECO-P1	Amend	AMEND ECO-P1 as follows: <u>To protect indigenous biological diversity in the within-coastal environment:</u> 1. Avoid adverse effects of <u>activities: subdivision, land use and development on:</u> a. <u>Threatened or At-Risk Indigenous Species</u> <u>Indigenous taxa that are listed as threatened or at risk in the New Zealand Threat Classification System Lists;</u> b. <u>areas of significant indigenous vegetation and significant habitat of indigenous fauna; Taxa that are listed by the International Union for Conservation of Nature and Natural Resources as threatened;</u> c. <u>Areas of indigenous biodiversity protected under other legislation; and Indigenous ecosystems and vegetation types that are threatened in the coastal environment, or are naturally rare;</u> d. <u>Habitats of indigenous species where the species are at the limit of their natural range, or are naturally rare;</u> e. <u>Areas containing nationally significant examples of indigenous community types; and</u>	<ul style="list-style-type: none"> ECO-P1 should be amended to include all New Zealand Coastal Policy Statement Policy 11 clauses in order to give effect to the New Zealand Coastal Policy Statement.

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				<p>f. <u>Areas set aside for full or partial protection of indigenous biological diversity under other legislation; and</u></p> <p>2. Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects <u>of activities</u> on:</p> <p>a. Areas of predominantly indigenous vegetation <u>in the coastal environment;</u></p> <p>b. <u>Habitats in the coastal environment that are important during the vulnerable life stages of indigenous species;</u></p> <p>c. <u>Indigenous ecosystems and habitats that are only found in the coastal environment and are particularly vulnerable to modification, including estuaries lagoons, coastal wetlands, dunelands, intertidal zones, rocky reef systems, eelgrass and saltmarsh;</u></p> <p>d. <u>Habitats of indigenous fauna in the coastal environment that are important for recreational, commercial, traditional, or cultural purposes;</u></p> <p>e. <u>Habitats, including areas and routes, important to migratory species; and</u></p> <p>f. <u>Ecological corridors, and areas important for linking or maintaining biological values identified under this policy.</u></p> <p>AND</p> <p>Any further or alternative relief to like effect to that sought.</p>	
332.16	Northland Regional Council	ECO-P1	Amend	AMEND ECO-P1 to better reflect the Northland Regional Policy Statement's direction on overall biodiversity outcomes.	<ul style="list-style-type: none"> In accompaniment to the submitter's requests seeking amendments to the Ecosystems and Indigenous Biodiversity chapter objectives, amendments are also sought to the Ecosystems and Indigenous Biodiversity chapter policies to better reflect regional policy direction (refer submission points 332.17-18).
136.52	Federated Farmers of New Zealand (Inc) - Northland Province	ECO-P1	Support	RETAIN ECO-P1 as notified. OR Wording with similar intent. AND Any consequential amendments.	<ul style="list-style-type: none"> Supports the policy ECO-P1 as notified.
289.12	Tappenden Holdings Limited	ECO-P1	Support	RETAIN ECO-P1. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The policies appropriately give effect to the requirements of the New Zealand Coastal Policy Statement and the Northland Regional Policy Statement.
300.14	Bream Tail Residents Association Incorporated	ECO-P1	Support	RETAIN ECO-P1. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The policies appropriately give effect to the requirements of the New Zealand Coastal Policy Statement and the Northland Regional Policy Statement.
292.78	Transpower New Zealand Limited	ECO-P2	Amend	<p>AMEND ECO-P2 to clarify that it does not apply to the National Grid. OR AMEND ECO-P2 to appropriately recognise the National Grid and give effect to the National Policy Statement on Electricity Transmission. AND Alternative or consequential relief as may be necessary to fully achieve the relief sought by the submission.</p>	<ul style="list-style-type: none"> As drafted, ECO-P2 would apply to the National Grid and there is no reconciliation with the National Grid specific policy INF-P10, or any other policies in the Infrastructure chapter. ECO-P2 also applies an offsetting and compensation requirement which is not appropriate to apply to the National Grid given the National Policy Statement on Electricity Transmission has no such policy directive and the National Policy Statement on Indigenous Biodiversity does not apply to electricity transmission.
304.68	Director General of Conservation	ECO-P2	Amend	<p>AMEND ECO-P2 as follows: Outside the coastal environment:</p> <p>1. Avoid, in the first instance, remedy or mitigate adverse effects of subdivision, land use and development on to ensure adverse effects are no more than minor on;</p> <p>a. Threatened and At-Risk indigenous species;</p> <p>b. Areas of significant indigenous vegetation and significant habitats of indigenous fauna;</p> <p>c. Areas of indigenous biodiversity protected under other legislation; and</p>	<ul style="list-style-type: none"> Opposes ECO-P2 in part and considers it requires amendments in order to align with the s6(c) Resource Management Act and Policy 3.16 of the Northland Regional Policy Statement, which requires the prioritisation of protecting areas of significant vegetation and significant habitats of indigenous. The amendments sought mean that the policy will require avoidance in the first instance, then for adverse effects to be demonstrated as unavoidable before accessing the effects management hierarchy (a definition of the latter is sought by the submitter). The effects

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				<p><u>Where adverse effects have been demonstrated to be unavoidable apply the effects management hierarchy to ensure adverse effects on a – c. are less than minor.</u></p> <p><u>2. Avoid, remedy, or mitigate offset or compensate Apply the effects management hierarchy to ensure there are no significant adverse effects, and avoid, remedy or mitigate other effects from subdivision, land use and development to ensure there are no effects on:</u></p> <ol style="list-style-type: none"> Areas of predominantly indigenous vegetation; and Indigenous species, habitats and ecosystems. <u>that are important for recreational, commercial, traditional or cultural purposes or are particularly vulnerable to modification.</u> <p>AND</p> <p>Any further or alternative relief to like effect to that sought.</p>	<p>management hierarchy includes biodiversity offsetting, compensation and measures, provided each is in accordance with applicable principles found within the appendix requested by the submitter.</p>
332.62	Northland Regional Council	ECO-P2	Amend	<p>AMEND ECO-P2 to better reflect the Northland Regional Policy Statement's direction on overall biodiversity outcomes.</p>	<ul style="list-style-type: none"> In accompaniment to the submitter's requests seeking amendments to the Ecosystems and Indigenous Biodiversity chapter objectives, amendments are also sought to the Ecosystems and Indigenous Biodiversity chapter policies to better reflect regional policy direction (refer submission points 332.17-18).
149.41	Royal Forest and Bird Protection Society of New Zealand Incorporated	ECO-P2	Oppose	<p>AMEND the Ecosystems and Indigenous Biodiversity chapter to ensure that the revised policies reflect the ongoing requirement to give effect to the Resource Management Act, including s6(c) and 7(d).</p> <p>AND</p> <p>AMEND the Ecosystems and Indigenous Biodiversity chapter to include appropriate cross-referencing to other parts of the plan that support these outcomes, such as provisions that maintain biodiversity outside significant areas or promote increasing indigenous vegetation cover.</p> <p>AND</p> <p>RETAIN ECO-P2.1. as notified and consider adding additional ecological areas of importance for protection.</p> <p>AND</p> <p>AMEND ECO-P2.1.b. by adding reference to Northland Regional Policy Statement criteria for the identification of areas that meet s6 of the Resource Management Act.</p> <p>AND</p> <p>AMEND ECO-P2.2. as follows:</p> <p>2. Avoid, remedy, or mitigate, <u>offset or compensate</u> adverse effects of subdivision, land use and development to ensure there are no significant adverse effects on:</p> <ol style="list-style-type: none"> Areas of predominantly indigenous vegetation; and Indigenous species, habitats and ecosystems that are important for recreational, commercial, traditional or cultural purposes or are particularly vulnerable to modification. <u>Ecological corridors, and areas important for linking or maintaining biological values identified under this policy.</u> <p>3. <u>Where clauses 1 and 2 are met, ensure that any other adverse effects on indigenous biodiversity are avoided, remedied or mitigated as far as practicable, then consider biodiversity offsetting or if offsetting is not possible, biodiversity compensation of more than minor residual adverse effects.</u></p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes ECO-P2 as proposed and considers it is too broad and does not fully give effect to key provisions of the National Policy Statement for Indigenous Biodiversity (NPS-IB). Specifically, Clauses 3.10 to 3.17. The submitter acknowledges the identification of SNAs is currently being on hold; however, the NPS-IB direction remains in force and should be implemented. Moreover, s6(c) and s7(d) Resource Management Act apply and require Kaipara District Council to recognise and provide for the protection of significant indigenous vegetation and habitats of indigenous fauna. As well as having particular regard to the intrinsic values of ecosystems. It is requested that the Proposed District Plan policy framework is revised to include and protect additional ecological areas.
136.53	Federated Farmers of New Zealand (Inc) - Northland Province	ECO-P2	Support	<p>RETAIN ECO-P2 as notified.</p> <p>OR</p> <p>Wording with similar intent.</p> <p>AND</p> <p>Any consequential amendments.</p>	<ul style="list-style-type: none"> Supports the policy ECO-P2 as notified.
257.26	Piroa Conservation Trust	ECO-P2	Support	<p>RETAIN ECO-P2.</p>	<ul style="list-style-type: none"> No reasons provided.
272.30	J & C Hawley	ECO-P2	Support	<p>RETAIN ECO-P2 as notified.</p>	<ul style="list-style-type: none"> No reasons provided.

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278.29	Marunui Conservation Ltd	ECO-P2	Support	RETAIN ECO-P2.	<ul style="list-style-type: none"> No reasons provided.
289.63	Tappenden Holdings Limited	ECO-P2	Support	RETAIN ECO-P2. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The policies appropriately give effect to the requirements of the New Zealand Coastal Policy Statement and the Northland Regional Policy Statement.
300.80	Bream Tail Residents Association Incorporated	ECO-P2	Support	RETAIN ECO-P2. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The policies appropriately give effect to the requirements of the New Zealand Coastal Policy Statement and the Northland Regional Policy Statement.
283.147	Northpower Limited and Northpower Fibre Limited	ECO-P3	Amend	AMEND ECO-P3 as follows: “Manage subdivision, land use and development to protect significant indigenous vegetation and significant habitat of indigenous vegetation and maintain indigenous biodiversity in a way that: 1. Does not unreasonably restrict existing primary production activities, particularly on highly productive land; 2. Recognises the operational need or functional need of Regionally Significant Infrastructure <u>and infrastructure</u> to traverse or locate within areas of significant indigenous vegetation and significant habitat of indigenous fauna where there are no practical alternative locations; 3. Allows for operation, <u>use, repair, upgrading and</u> maintenance of existing structures, including infrastructure; and 4. Enables land to be used and developed to support the social, economic and cultural well-being of people and communities.” AND Any further necessary consequential amendments required.	<ul style="list-style-type: none"> All infrastructure should be recognised in order to be consistent with the infrastructure enabling provisions in other chapters of the Proposed District Plan. To provide for the upgrading of infrastructure.
332.63	Northland Regional Council	ECO-P3	Amend	AMEND ECO-P3 to better reflect the Northland Regional Policy Statement's direction on overall biodiversity outcomes.	<ul style="list-style-type: none"> In accompaniment to the submitter's requests seeking amendments to the Ecosystems and Indigenous Biodiversity chapter objectives, amendments are also sought to the Ecosystems and Indigenous Biodiversity chapter policies to better reflect regional policy direction (refer submission points 332.17-18).
149.42	Royal Forest and Bird Protection Society of New Zealand Incorporated	ECO-P3	Oppose	AMEND ECO-P3 to reframe the policy so its primary focus is on the protection and maintenance of this indigenous biodiversity. Rather than providing for activities which could conflict with these outcomes. AMEND the Proposed District Plan to ensure any enabling provisions are clearly subordinate to the overarching protection and maintenance outcomes o give effect to the National Policy Statement for Indigenous Biodiversity and Regional Policy Statement. AND AMEND ECO-P3 by splitting the policy into two or more distinct policies—one focused on setting out the biodiversity protection and maintenance outcomes in line with the National Policy Statement for Indigenous Biodiversity and Regional Policy Statement and another dealing with specific circumstances where limited adverse effects may be acceptable, as set out in the National Policy Statement for Indigenous Biodiversity, such as established activities or maintenance of improved pasture for farming.	<ul style="list-style-type: none"> The policy, while referencing the protection of significant indigenous vegetation and habitats of indigenous fauna, is primarily around accepted effects. The emphasis appears to be on enabling subdivision, land use and development—particularly for primary production, infrastructure, and broader wellbeing—rather than providing clear direction to protect and maintain indigenous biodiversity, as required by section 6(c) of the Resource Management Act and the National Policy Statement for Indigenous Biodiversity. This framing risks undermining the plan's ability to give full effect to both the Resource Management Act and the National Policy Statement for Indigenous Biodiversity, which require adverse effects on biodiversity to be managed to protect significant indigenous biodiversity.
304.69	Director General of Conservation	ECO-P3	Oppose	AMEND ECO-P3 as follows: Protection and maintenance of indigenous biodiversity Manage subdivision, land use and development to protect significant indigenous vegetation and significant habitat of indigenous fauna and maintain indigenous biodiversity in a way that: <u>while providing for the activities in ECO-R1.</u> 1. Does not unreasonably restrict existing primary production activities, particularly on highly productive land; 2. Recognises the operational need or functional need of regionally significant infrastructure to traverse or locate within areas of significant indigenous vegetation and significant habitat of indigenous fauna where there are no practicable alternative locations; 3. Allows for operation, use and maintenance of existing structures, including infrastructure; and	<ul style="list-style-type: none"> The submitter is concerned that ECO-P3 clauses 1-4 are unrelated to the policy title. As drafted, the intention for ECO-P3 to provide the policy basis for permitted vegetation clearance is not clear. Therefore, amendments are sought to ECO-P3 so the policy specifically provides for the activities in ECO-R1.

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				4. Enables land to be used and developed to support the social, economic and cultural well-being of people and communities. AND Any alternative or consequential relief.	
332.17	Northland Regional Council	ECO-P3	Oppose	DELETE ECO-P3.	<ul style="list-style-type: none"> The Policy does not provide any direction on the management of indigenous biodiversity. Moreover, elements within ECO-P3 are already addressed through other Proposed District Plan provisions.
26.59	Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ	ECO-P3	Support	RETAIN ECO-P3 as notified. AND Any alternative relief and/or consequential amendments.	<ul style="list-style-type: none"> The policy appropriately recognises the operational need and functional need of regionally significant infrastructure to traverse areas of indigenous vegetation and biodiversity in appropriate circumstances.
136.54	Federated Farmers of New Zealand (Inc) - Northland Province	ECO-P3	Support	RETAIN ECO-P3 as notified. OR Wording with similar intent. AND Any consequential amendments.	<ul style="list-style-type: none"> Supports the policy ECO-P3 as notified.
146.25	New Zealand Agricultural Aviation Association	ECO-P3	Support	RETAIN ECO-P3 as notified.	<ul style="list-style-type: none"> Requests it is retained as notified to maintain indigenous biodiversity in a way that does not unreasonably restrict existing primary production activities, as such activities are important for the local economy.
289.64	Tappenden Holdings Limited	ECO-P3	Support	RETAIN ECO-P3. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The policies appropriately give effect to the requirements of the New Zealand Coastal Policy Statement and the Northland Regional Policy Statement.
292.61	Transpower New Zealand Limited	ECO-P3	Support	RETAIN ECO-P3 as notified. AND Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.	<ul style="list-style-type: none"> The submitter supports the recognition of the functional or operational need of regionally significant infrastructure in sub-clause 2 of the policy.
300.81	Bream Tail Residents Association Incorporated	ECO-P3	Support	RETAIN ECO-P3. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The policies appropriately give effect to the requirements of the New Zealand Coastal Policy Statement and the Northland Regional Policy Statement.
323.51	KiwiRail Holdings Limited	ECO-P3	Support	RETAIN ECO-P3 as proposed. AND any consequential changes to link and/or accommodate the requested change in the stated, or alternate location.	<ul style="list-style-type: none"> The submitter supports ECO-P3 and requests it is retained as notified.
237.18	K P Dreadon Limited	ECO-P4	Amend	ADD the following sentence to ECO-P4: <u>This may include transferable development right mechanisms that coordinate protection and enhancement across multiple properties to achieve landscape-scale ecological outcomes.</u>	<ul style="list-style-type: none"> ECO-P4 should explicitly enable coordination across multiple properties using mechanisms such as transferable development rights to support landscape-scale outcomes.
257.27	Piroa Conservation Trust	ECO-P4	Amend	ADD a new clause 4 to ECO-P4 as follows: <u>4. Controlling the introduction or keeping of species with recognised pest potential.</u>	<ul style="list-style-type: none"> This is a method that the Northland Regional Policy Statement states should be included in district plans.
272.31	J & C Hawley	ECO-P4	Amend	ADD a new clause 4 to ECO-P4 as follows: <u>4. Controlling the introduction or keeping of species with recognised pest potential.</u>	<ul style="list-style-type: none"> This is a method that the Northland Regional Policy Statement states should be included in district plans.
278.30	Marunui Conservation Ltd	ECO-P4	Amend	ADD a new clause 4 to ECO-P4, as follows: <u>4. Controlling the introduction or keeping of species with recognised pest potential.</u>	<ul style="list-style-type: none"> This is a method that the Northland Regional Policy Statement states should be included in district plans.
332.64	Northland Regional Council	ECO-P4	Amend	AMEND ECO-P4 to better reflect the Northland Regional Policy Statement's direction on overall biodiversity outcomes.	<ul style="list-style-type: none"> In accompaniment to the submitter's requests seeking amendments to the Ecosystems and Indigenous Biodiversity chapter objectives, amendments are also sought to the Ecosystems and Indigenous Biodiversity chapter policies to better reflect regional policy direction (refer submission points 332.17-18).

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Summary of Submissions for the topic of: Ecosystems and Indigenous Biodiversity (in Provision order)

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
149.43	Royal Forest and Bird Protection Society of New Zealand Incorporated	ECO-P4	Oppose	AMEND ECO-P4 to: <ul style="list-style-type: none"> Reflect the restoration direction in clause 3.21 of the National Policy Statement for Indigenous Biodiversity; Prioritise restoration in areas in accordance with clause 3.21 of the National Policy Statement for Indigenous Biodiversity; Provide for the use of consent or designation conditions to secure restoration where new use and development is proposed.; Encourage uses to refer to the identification of areas meeting the Regional Policy Statement significance criteria in the report prepared by Wildlands for the Council; Include Council's intent to continue ground truthing the areas identified as meeting Regional Policy Statement significance criteria in the Wildlands report (see reference earlier in these submissions).	<ul style="list-style-type: none"> The policy does not give full effect to clause 3.21 of the National Policy Statement for Indigenous Biodiversity, which sets specific expectations around restoration. These include the reconstruction of degraded areas, prioritising restoration in key locations, and applying conditions on resource consents and designations to support restoration outcomes for priority areas.
304.70	Director General of Conservation	ECO-P4	Oppose	DELETE ECO-P4 (note incorrect reference in the submission). OR AMEND ECO-P4 to achieve the following: <ul style="list-style-type: none"> give effect to National Policy Statement for Indigenous Biodiversity Policy 10, clause 3.5. provide for the exercise of kaitiakitanga by tangata whenua in protecting, maintaining, and restoring indigenous biodiversity within their rohe. AND Any alternative or consequential relief.	<ul style="list-style-type: none"> The submitter considers that this policy should only be included, subject to amendment, as part of the provisions package sought by the submitter which gives effect to the National Policy Statement for Indigenous Biodiversity provisions still in force. If this policy is to be retained, it should be amended as follows: <ul style="list-style-type: none"> to give effect to National Policy Statement for Indigenous Biodiversity policy 10, clause 3.5. provide for the exercise of kaitiakitanga by tangata whenua in protecting, maintaining, and restoring indigenous biodiversity within their rohe.
136.55	Federated Farmers of New Zealand (Inc) - Northland Province	ECO-P4	Support	RETAIN ECO-P4 as notified. OR Wording with similar intent. AND Any consequential amendments.	<ul style="list-style-type: none"> Supports the policy ECO-P4 as notified.
146.26	New Zealand Agricultural Aviation Association	ECO-P4	Support	RETAIN ECO-P4 as notified.	<ul style="list-style-type: none"> Retain as notified as the removal or management of pest plants and animals, as well as enabling biosecurity works, are critical activities to achieve restoration and enhancement of indigenous biodiversity.
267.5	Northland Fish and Game Council	ECO-P4	Support	RETAIN ECO-P4 as notified.	<ul style="list-style-type: none"> No reasons provided.
289.65	Tappenden Holdings Limited	ECO-P4	Support	RETAIN ECO-P4. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The policies appropriately give effect to the requirements of the New Zealand Coastal Policy Statement and the Northland Regional Policy Statement.
300.82	Bream Tail Residents Association Incorporated	ECO-P4	Support	RETAIN ECO-P4. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The policies appropriately give effect to the requirements of the New Zealand Coastal Policy Statement and the Northland Regional Policy Statement.
267.6	Northland Fish and Game Council	ECO-P5		RETAIN ECO-P5 as notified.	<ul style="list-style-type: none"> No reasons provided.
237.19	K P Dreadon Limited	ECO-P5	Amend	ADD the following to ECO-PS: <u>Legal protection may also be achieved through frameworks such as transferable development rights, which incentivise and systematise protection and restoration outcomes.</u>	<ul style="list-style-type: none"> ECO-P5 should explicitly recognise transferable development rights frameworks as a tool to incentivise the legal protection and management of significant indigenous vegetation and habitats.
136.56	Federated Farmers of New Zealand (Inc) - Northland Province	ECO-P5	Support	RETAIN ECO-P5 as notified. OR Wording with similar intent. AND Any consequential amendments.	<ul style="list-style-type: none"> Supports the policy ECO-P5 as notified.
289.66	Tappenden Holdings Limited	ECO-P5	Support	RETAIN ECO-P5. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The policies appropriately give effect to the requirements of the New Zealand Coastal Policy Statement and the Northland Regional Policy Statement.

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
300.83	Bream Tail Residents Association Incorporated	ECO-P5	Support	RETAIN ECO-P5. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The policies appropriately give effect to the requirements of the New Zealand Coastal Policy Statement and the Northland Regional Policy Statement.
140.47	Horticulture New Zealand	ECO-R1	Amend	AMEND ECO-R1.1.d. by replacing the wording as follows (note referencing error in submission): d. To remove pest species in accordance with any approved pest management plan or biosecurity operational plan; <u>d. clearance for the control pests for biosecurity reasons and the removal or burial, of material infected by unwanted organisms as a response to directions of a person authorised under the Biosecurity Act 1993;</u> AND Any consequential or alternative amendments required to address the concerns raised by the submitter.	<ul style="list-style-type: none"> The submitter supports ECO-R1 in part but notes that the Northland Regional Pest Management Plan lists pests to restrict permitted activities to only those listed.
140.50	Horticulture New Zealand	ECO-R1	Amend	AMEND ECO-R1.1.d. as follows: d. To remove pest species <u>and diseased vegetation</u> in accordance with any approved pest management plan or biosecurity operational plan; AND Any consequential or alternative amendments required to address the concerns raised by the submitter.	<ul style="list-style-type: none"> ECO-R1 provides a permitted activity pathway for pest removal but not for diseased vegetation clearance.
146.27	New Zealand Agricultural Aviation Association	ECO-R1	Amend	AMEND ECO-R1.1.i as follows: i. The removal or clearance of indigenous vegetation from land that was previously cleared, <u>or for the maintenance of improved pasture</u> , and where the indigenous vegetation to be cleared is less than 10 years old; AND ADD definitions for "Improved Pasture" and "Maintenance of Improved Pasture", as requested by the submitter in other submission points.	<ul style="list-style-type: none"> The submitter supports ECO-R1 in part. In particular, provisions that permit the removal of pests is supported but of provisions that permit the maintenance of improved pasture are also important and require clarification.
257.28	Piroa Conservation Trust	ECO-R1	Amend	No specific decision requested but submitter raises concern with the 1000m ² extent for clearance in ECO-R1 and considers it is not small scale if it applies in a zone underlying an Outstanding Natural Landscape such as the Piroa Brynderwyn Range as it would excessive and have significant adverse effects on its ecosystem. The submitter also notes that the rules on such clearance are more stringent in the Coastal Environment, Natural Character, and Natural Features and Landscapes chapters and that priority should be given to applying those rules.	<ul style="list-style-type: none"> No reasons provided.
263.13	Daytona Trust	ECO-R1	Amend	AMEND ECO-R1.1.f to also allow the construction of buildings ancillary to a single residential unit (including garages and minor dwellings) as a permitted activity with the 1000m ² threshold. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The rule should also provide for other buildings ancillary to residential buildings within this specified threshold, which can establish without any further impact on the amount of indigenous vegetation cleared than that already provided for.
267.7	Northland Fish and Game Council	ECO-R1	Amend	AMEND ECO-R1.1. as follows: d. To remove pest species in accordance with any <u>approved</u> pest management plan or biosecurity operational plan <u>approved by the relevant local authority</u> ; i. The removal or clearance of indigenous vegetation from land that was previously cleared; <u>and</u> where the indigenous vegetation to be cleared is less than 10 years old, <u>the removal is no more than 250m² per holding per calendar year and is not within 5 m of a waterbody</u> ; and j. Creation and maintenance of firebreaks to manage fire risk <u>which complies with section 43 and 64 of the Fire and Emergency Act 2017</u> .	<ul style="list-style-type: none"> The rule ECO R1.d. should have a qualifier with regards to who specifically approves a pest management plan i.e. the District or Regional Council, the Department of Conservation etc. The rule ECO-R1.i. does not include a spatial parameter, limiting clearing to a specific amount. 10 year old indigenous regeneration vegetation can provide valuable habitat and should not be able to be removed without an area limit as a permitted activity. The rule ECO-R1 j. is broad and open to interpretation; It refers to maintenance of firebreaks but does not define these. Also 'manage fire risk' can mean different things to different people. The lack of clarity may provide a loophole and frustrate Council's enforcement work. We strongly recommend providing specific criteria for this rule, for example, limiting this to work which complies with section 43 or 64 of the Fire and Emergency Act 2017
272.32	J & C Hawley	ECO-R1	Amend	<ul style="list-style-type: none"> No specific decision requested but submitter raises concern with the 1000m² extent for clearance in ECO-R1 and considers it is not small scale if it 	<ul style="list-style-type: none"> No reasons provided.

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				<p>applies in a zone underlying an Outstanding Natural Landscape such as the Piroa Brynderwyn Range it would be excessive and have significant adverse effects on its ecosystem.</p> <p>The submitter also notes that the rules on such clearance are more stringent in the Coastal Environment, Natural Character, and Natural Features and Landscapes chapters and that priority should be given to applying those rules.</p>	
278.31	Marunui Conservation Ltd	ECO-R1	Amend	<p>No specific decision requested; but the submitter raises concern with the 1000m² extent for clearance in ECO-R1 and considers it is not small scale if it applies in a zone underlying an Outstanding Natural Landscape such as the Brynderwyn Range - it would be excessive and have significant effects on its ecosystem. The submitter also notes that the rules on such clearance are more stringent in the Coastal Environment, Natural Character, and Natural Features and Landscapes chapters and that priority should be given to applying those rules.</p>	<ul style="list-style-type: none"> No reasons provided.
283.148	Northpower Limited and Northpower Fibre Limited	ECO-R1	Amend	<p>AMEND ECO-R1.1.l. as follows:</p> <p>"... l. clearance for the operation, use, repair, <u>upgrading</u> or maintenance of the following activities where they have been lawfully established: i. Fences; AND Any further necessary consequential amendments required.</p>	<ul style="list-style-type: none"> To provide for the upgrading of infrastructure as a permitted activity.
289.13	Tappenden Holdings Limited	ECO-R1	Amend	<p>AMEND ECO-R1.1.f to also allow the construction of buildings ancillary to a single residential unit (including garages and minor dwellings) as a permitted activity with the 1000m² threshold. AND Any consequential amendments or alternative relief to address the matters raised in the submission.</p>	<ul style="list-style-type: none"> The rule should also provide for other buildings ancillary to residential buildings within this specified threshold, which can establish without any further impact on the amount of indigenous vegetation cleared than that already provided for.
292.62	Transpower New Zealand Limited	ECO-R1	Amend	<p>RETAIN ECO-R1. AND AMEND ECO-R1.1.l. as follows: l. Clearance for the operation, repair, <u>minor upgrading</u> or maintenance of the following activities where they have been lawfully established: i. Fences; ii. Infrastructure <u>and associated access tracks</u>; iii. Buildings; ... AND Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.</p>	<ul style="list-style-type: none"> Transpower supports clause 1.l.ii of ECO-R1 as it appropriately provides a permitted activity status for operation, maintenance, or repair of infrastructure. An amendment is sought to include reference to 'minor upgrading' noting the associated definition and very confined nature of works this would capture. A minor amendment is also sought to include reference to 'associated access tracks'. While these are potentially captured by other clauses, their inclusion is sought for the avoidance of doubt.
300.15	Bream Tail Residents Association Incorporated	ECO-R1	Amend	<p>AMEND ECO-R1.1.f to also allow the construction of buildings ancillary to a single residential unit (including garages and minor dwellings) as a permitted activity with the 1000m² threshold. AND Any consequential amendments or alternative relief to address the matters raised in the submission.</p>	<ul style="list-style-type: none"> The rule should also provide for other buildings ancillary to residential buildings within this specified threshold, which can establish without any further impact on the amount of indigenous vegetation cleared than that already provided for.
332.20	Northland Regional Council	ECO-R1	Amend	<p>DELETE ECO-R1.1.i.</p>	<ul style="list-style-type: none"> The Northland Regional Policy Statement seeks that biodiversity values are maintained and, where practicable, enhanced. The submitter does not consider that the Ecosystems and Indigenous Biodiversity chapter rules achieve this objective and is concerned they will result in a cumulative loss of biodiversity. Ecosystems and Indigenous Biodiversity chapter rules do not recognise the potential habitat of threatened species associated with regenerating indigenous vegetation less than 10-years old. Moreover, they are inconsistent with adjoining district provisions.
149.44	Royal Forest and Bird Protection Society of New	ECO-R1	Oppose	<p>RETAIN the permitted rule approach of ECO-R1 being for specified purposes only. AND</p>	<ul style="list-style-type: none"> The submitter opposes ECO-R1 as proposed. The rule permits too broad of a range of indigenous vegetation clearance activities without requirements

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
	Zealand Incorporated			<p>DELETE ECO-R1.b. and .f. AND DELETE ECO-R1.h. AND AMEND ECO-R1.j. to ensure it is not abused by limiting functions under appropriate acts or services. AND AMEND ECO-R1.l. to include limits on the extent of clearance (e.g., within 1m). AND AMEND ECO-R1 so it does not enable unlimited total area of clearance of vegetation or land disturbance by permitted activities to any degree not intended by the National Policy Statement for Indigenous Biodiversity. AND AMEND ECO-R1 to apply area clearance limits over the plan's lifetime or a 12-month period where appropriate. AND Any consequential amendments and alternative relief to address the concerns raised.</p>	<p>to manage adverse effects. The submitter considers ECO-R1 risks undermining the protection and maintenance of indigenous biodiversity by providing a blanket permitted activity status for clearance, which is concerning given the Proposed District Plan does not map significant areas which otherwise could be excluded from this rule. There is no requirement for an assessment of the vegetation being cleared, nor are there any limits imposed based on ecological context, habitat types, or Significant Natural Area connection. The submitter considers this approach could result in incremental loss of indigenous vegetation throughout Kaipara.</p> <ul style="list-style-type: none"> More specifically, ECO-R1.d. should be deleted as new walking tracks might not be appropriate within areas that meet Regional Policy Statement significance criteria and could result in spread of Kauri Dieback. ECO-R1.h. should also be deleted as Council has responsibilities to protect and maintain biodiversity. Finally, clearance limits should be applied over the plan's lifetime or subject to 2-month periods to ensure any permitted clearance and disturbance is appropriately managed in order to protect and maintain biodiversity.
217.43	Cato Bolam Consultants Limited	ECO-R1	Oppose	<p>AMEND ECO-R1.1.e. to reduce the clearance setback to 10m. AND AMEND ECO-R1.1.f. to reduce clearance allowed as a permitted activity to 500m³. AND Any other relief that is consistent with and/or consequential to the submission.</p>	<ul style="list-style-type: none"> With regard to ECO-R1.1.e., a 20m setback from a dwelling is an excessive amount of clearance. With regard to ECO-R1.1.f., 1000m² of clearance for the construction of a dwelling is considered excessive.
304.73	Director General of Conservation	ECO-R1	Oppose	<p>AMEND ECO-R1 - see submission for details of amendments sought. AND Any further or alternative relief to like effect to that sought.</p>	<ul style="list-style-type: none"> Opposes ECO-R1 as it fails to recognise s6(c) of the Resource Management Act, the National Policy Statement for Indigenous Biodiversity (NPS-IB) and Policy 3.15 of the Northland Regional Policy Statement (NRPS). The submitters concerns are summarised below - refer to submission for details: <ul style="list-style-type: none"> Constructing a new fence should not require 3.5m of clearance either side. As drafted, the rule permits up to 7m of clearance. Creating new setbacks for buildings from indigenous vegetation should be separated from the maintenance of existing setbacks. New setbacks have potential adverse effects on indigenous vegetation by reducing area and exposing the vegetation to pests and weeds. High amounts of indigenous vegetation clearance is permitted in all zones for the purposes of establishing, constructing and completing residential development, including associated onsite infrastructure and access, thus leaving large areas of indigenous vegetation unprotected. As drafted, the rule does not manage Kauri Dieback Disease.
26.60	Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ	ECO-R1	Support	<p>RETAIN ECO-R1 as notified. AND Any alternative relief and/or consequential amendments.</p>	<ul style="list-style-type: none"> The rule provides practical provision for operating, repairing and maintaining infrastructure.
67.2	Adam Booth	ECO-R1	Support	<p>RETAIN ECO-R1 insofar as it provides for clearance to form a building site on a property and the ability to maintain clearance between dwellings and vegetation.</p>	<ul style="list-style-type: none"> No reasons provided.
136.64	Federated Farmers of New Zealand (Inc) - Northland Province	ECO-R1	Support	<p>RETAIN ECO-R1 as notified in the Proposed District Plan or with wording with similar intent; and AND ADD ECO-R1 into the Earthworks chapter. AND Any consequential amendments.</p>	<ul style="list-style-type: none"> The submitter supports the rule ECO-R1 as it provides for lawful, necessary, or activities with minor effect to occur as a permitted activity. It is noted that the NPS gives mandatory direction for the layout of District Plans. Section 7, clause 29 states that provisions for managing earthworks must be located in the Earthworks chapter. It is queried

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					the rule would be better located in the Earthworks chapter as the clearance of indigenous vegetation is a subset of earthworks.
158.2	Manulife Forest Management NZ Ltd	ECO-R1	Support	RETAIN ECO-R1.	<ul style="list-style-type: none"> The submitter supports this rule, in particular the note that clarifies indigenous vegetation clearance associated with plantation forestry is regulated by the NES-CF.
308.43	Fire and Emergency New Zealand	ECO-R1	Support	RETAIN ECO-R1 as notified.	<ul style="list-style-type: none"> Rule is supported to the extent that it enables landowners to clear indigenous vegetation clearance to create and maintain firebreaks to manage fire risk.
309.58	Clarus	ECO-R1	Support	RETAIN ECO-R1. AND Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.	<ul style="list-style-type: none"> It is important that clearance for essential operation, repair and maintenance of infrastructure is permitted.
323.52	KiwiRail Holdings Limited	ECO-R1	Support	RETAIN ECO-R1 as notified. AND any consequential changes to link and/or accommodate the requested change in the stated, or alternate location.	<ul style="list-style-type: none"> The submitter supports ECO-R1 and requests it is retained as notified.
125.6	Madara Vilde	ECO-R2	Amend	AMEND ECO-R2 to allow: <ul style="list-style-type: none"> Up to 100 m² per site per calendar year of indigenous vegetation clearance as a permitted activity outside any area identified as significant indigenous vegetation under Appendix 5 of the Northland Regional Policy Statement; and Up to 500m ² indigenous vegetation clearance as a restricted discretionary activity for the purpose of creating a house site, subject to ecological assessment, management plan and other mitigation measures.	<ul style="list-style-type: none"> The permitted clearance thresholds are too high. The suggested amendments reflect a reasonable balance between landowner flexibility and ecological protection in less sensitive areas. The additional requirements will ensure any impacts are fully addressed and appropriately mitigated and align with higher order policy direction and best practice.
263.14	Daytona Trust	ECO-R2	Amend	DELETE from ECO-R2.2. the requirement that a restricted discretionary activity application for indigenous vegetation clearance and any associated land disturbance, includes an assessment, carried out by a suitably qualified ecologist, of whether or not any of the indigenous vegetation proposed to be cleared meets the criteria in Appendix 5 of the Northland Regional Policy Statement 2016 (Areas of significant indigenous vegetation and significant habitats of indigenous fauna) AND DELETE the discretionary activity status at ECO-R2.4. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> ECO-R2.4. imposes an unnecessary and unfair burden on landowners to prove that the indigenous vegetation meets the criteria in Appendix 5. That should be the role of the District Council to undertake on a district-wide basis, rather than on an individual application basis, which risks inconsistent application of the criteria. In any event, the criteria in Appendix 5 of the RPS pre-date the National Policy Statement on Indigenous Biodiversity (amended October 2024) and its methods should be adopted, including being managed in an integrated way (policy 5) and identified using a consistent approach (policy 6). The matters of discretion already provided under the rule ECO-R2 provide ample scope for the Council to assess the effects of the clearance on indigenous biodiversity values.
267.8	Northland Fish and Game Council	ECO-R2	Amend	AMEND ECO-R2.1. as follows: Where: a. It does not exceed 1,000m ² per site in any calendar year in the Māori purpose zone, General rural zone, and Rural lifestyle zone; or b. It does not exceed 500m ² per site in any calendar year in all other zones: <u>It does not exceed 100m² per site in any calendar year.</u>	<ul style="list-style-type: none"> The submitter considers that 1,000m² a year is too large an area to enable indigenous vegetation clearance as a permitted activity for the general rural zone and rural lifestyle zone. The submitter seeks the rule be amended to 100m² per site per calendar year unless other qualifiers are included similar to the Proposed Far North District Plan.
289.14	Tappenden Holdings Limited	ECO-R2	Amend	DELETE from ECO-R2.2 the requirement that a restricted discretionary activity application for indigenous vegetation clearance and any associated land disturbance, includes an assessment, carried out by a suitably qualified ecologist, of whether or not any of the indigenous vegetation proposed to be cleared meets the criteria in Appendix 5 of the Northland Regional Policy Statement 2016 (Areas of significant indigenous vegetation and significant habitats of indigenous fauna). AND DELETE the discretionary activity status of ECO-R2.4. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> Refer to submission for detailed reasoning. Reasons summarised as: ECO-R2.4 imposes an unnecessary and unfair burden on landowners to prove that the indigenous vegetation meets the criteria in Appendix 5. That should be the role of the District Council to undertake on a district-wide basis, rather than on an individual application basis, which risks inconsistent application of the criteria. In any event, the criteria in Appendix 5 of the RPS pre-date the National Policy Statement for Indigenous Biodiversity (amended October 2024) and its methods should be adopted, including being managed in an integrated way (policy

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					5) and identified using a consistent approach (policy 6). <ul style="list-style-type: none"> The matters of discretion already provided under the ECO-R2 provide ample scope for the Council to assess the effects of the clearance on indigenous biodiversity values.
300.16	Bream Tail Residents Association Incorporated	ECO-R2	Amend	DELETE from ECO-R2.2.: The requirement that a restricted discretionary activity application for indigenous vegetation clearance and any associated land disturbance, includes an assessment, carried out by a suitably qualified ecologist, of whether or not any of the indigenous vegetation proposed to be cleared meets the criteria in Appendix 5 of the Northland Regional Policy Statement 2016 (Areas of significant indigenous vegetation and significant habitats of indigenous fauna) AND DELETE the discretionary activity status at ECO-R2.4. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> Refer to submission for detailed reasoning. Reasons summarised as: ECO-R2.4 imposes an unnecessary and unfair burden on landowners to prove that the indigenous vegetation meets the criteria in Appendix 5. That should be the role of the District Council to undertake on a district-wide basis, rather than on an individual application basis, which risks inconsistent application of the criteria. In any event, the criteria in Appendix 5 of the Regional Policy Statement pre-date the National Policy Statement on Indigenous Biodiversity (amended October 2024) and its methods should be adopted, including being managed in an integrated way (policy 5) and identified using a consistent approach (policy 6). The matters of discretion already provided under the rule ECO-R2 provide ample scope for the Council to assess the effects of the clearance on indigenous biodiversity values.
332.21	Northland Regional Council	ECO-R2	Amend	AMEND ECO-R2.1.b. and ECO-R2.1.b. so the permitted activity threshold is 500m ² over a ten-year period instead of 1,000m ² or 500m ² annually.	<ul style="list-style-type: none"> The Northland Regional Policy Statement seeks that biodiversity values are maintained and, where practicable, enhanced. The submitter does not consider that Ecosystems and Indigenous Biodiversity chapter rules achieve this objective and is concerned they will result in a cumulative loss of biodiversity. Ecosystems and Indigenous Biodiversity chapter rules do not recognise the potential habitat of threatened species associated with regenerating indigenous vegetation less than 10-years old. Moreover, they are inconsistent with adjoining district provisions.
149.46	Royal Forest and Bird Protection Society of New Zealand Incorporated	ECO-R2	Oppose	DELETE Rule ECO-R2. OR AMEND ECO-R2 so the rule only applies outside of areas identified in the Wildlands Report as meeting Regional Policy Statement significance criteria. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> The submitter opposes ECO-R2 and requests it is either deleted or amended to only apply outside of identified areas. As proposed, ECO-R2 applies to broad 'per-event' thresholds and does not adequately safeguard areas or manage cumulative effects. The submitter does not consider this approach to be appropriate, especially as no areas of significant indigenous biodiversity have been identified. The submitter considers that the limits are too high to ensure indigenous biodiversity is protected in line with the National Policy Statement for Indigenous Biodiversity and the Regional Policy Statement. For example, repeated clearance or disturbance events below the threshold could result in significant cumulative effects, including loss of habitat and ecological integrity over the plan's lifespan. Such cumulative effects could impact upon areas that contribute to ecological connectivity, buffering, and ecosystem resilience. The submitter notes that, from the Section 32 report, ECO-R2 does not appear to be based on ecological advice.
217.44	Cato Bolam Consultants Limited	ECO-R2	Oppose	AMEND ECO-R2 to reduce the size of the permitted clearance area of indigenous vegetation per year. AND AMEND ECO-R2 to increase the timeframe over which clearance is measured. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> Providing for 500m² - 1,000m² clearance of indigenous vegetation is too much. A calendar year timeframe is too excessive.
304.74	Director General of Conservation	ECO-R2	Oppose	AMEND ECO-R2 as follows: <ul style="list-style-type: none"> Permit a maximum of up to 150m² of vegetation clearance in all zones and require discretionary activity consent if this threshold is exceeded, 	<ul style="list-style-type: none"> The submitter states it is not clear how enabling clearance of 500m² and 1,000m² of indigenous vegetation annually gives effect to higher-order documents, including s6(c) Resource Management

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				<p>accompanied by an assessment against Appendix 5 of the Northland Regional Policy Statement by a suitably qualified and experienced ecologist using the Wildlands Report.</p> <ul style="list-style-type: none"> Include the rules provided in the Biosecurity (National PA Pest Management Plan) Order 2022 (SL 2022/208) (as at 23 December 2023) as assessment criteria to manage Kauri Dieback. <p>OR</p> <p>AMEND ECO-R2.1. as set out below if the primary relief above is not granted:</p> <p>Indigenous vegetation clearance and any associated land disturbance not provided for under ECO-R1</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. <u>A report has been obtained from a suitably qualified and experienced ecologist confirming that the indigenous vegetation proposed to be cleared does not meet the criteria in Appendix 5 of the Northland Regional Policy Statement 2016 (Areas of significant indigenous vegetation and significant habitats of indigenous fauna); and</u></p> <p>i. It does not exceed 1,000m² per site in any calendar year in the Māori purpose zone, General rural zone, and Rural lifestyle zone; or</p> <p>ii. It does not exceed 500m² per site in any calendar year in all other zones; and</p> <p>b. <u>A report has not been obtained from a suitably qualified and experienced ecologist confirming that the indigenous vegetation does not meet the criteria in Appendix 5 of the Northland Regional Policy Statement 2016 (Areas of significant indigenous vegetation and significant habitats of indigenous fauna); and</u></p> <p>i. <u>It does not exceed 100m² per site in any calendar year.</u></p> <p><u>Activity status where compliance not achieved with 1. and 2: Discretionary.</u></p> <p>AND</p> <p>Any further or alternative relief to like effect to that sought.</p>	<p>Act, Policy 11(a) of the New Zealand Coastal Policy Statement, National Policy Statement for Indigenous Biodiversity, and Policy 4.4 of the Northland Regional Policy Statement.</p> <ul style="list-style-type: none"> Without assessment to understand what species are present or the rarity of the ecosystem, there can be no assurance that adverse effects are avoided. The submitter notes that at risk or threatened vegetation can occur on private land and as drafted, ECO-R2 enables clearance thresholds which could result in the loss of species within the Kaipara District or total extinction of more area-confined species. As drafted, Kauri Dieback is not a consideration within the provision, and the submitter requests its inclusion to ensure the management of affected sites.
26.61	Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ	ECO-R2	Support	<p>RETAIN ECO-R2 as notified.</p> <p>AND</p> <p>Any alternative relief and/or consequential amendments.</p>	<ul style="list-style-type: none"> The rule provides practical provision for clearance and associated disturbance for new infrastructure.
140.51	Horticulture New Zealand	ECO-R2	Support	<p>RETAIN ECO-R2 as notified.</p> <p>AND</p> <p>any consequential or alternative amendments required to address the concerns raised by the submitter.</p>	<ul style="list-style-type: none"> ECO-R2 supports ongoing rural land use while managing environmental risk.
284.16	New Zealand Defence Force	ECO-R2	Support	<p>RETAIN approach set out in ECO-R2.</p> <p>OR</p> <p>Wording to similar effect</p> <p>AND</p> <p>Any necessary further alternative or consequential relief as necessary to give effect to the submission.</p>	<ul style="list-style-type: none"> NZDF supports a permitted activity rule which provides for a specified (small) area of indigenous vegetation clearance and associated land disturbance.
292.63	Transpower New Zealand Limited	ECO-R2	Support	<p>RETAIN ECO-R2 as notified.</p> <p>AND</p> <p>Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.</p>	<ul style="list-style-type: none"> The submitter supports this rule.
309.59	Clarus	ECO-R2	Support	<p>RETAIN ECO-R2.</p> <p>AND</p> <p>Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.</p>	<ul style="list-style-type: none"> Submitter considers that this rule and its thresholds would apply to minor upgrading of infrastructure.
119.4	Amanda (Mandy) Harris	General	Amend	<p>AMEND the Ecosystems and Indigenous Biodiversity chapter to include stormwater management provisions.</p>	<ul style="list-style-type: none"> The submitter supports the inclusion of comprehensive urban stormwater planning

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					<p>provisions in the Proposed Kaipara District Plan 2025.</p> <ul style="list-style-type: none"> • Kaiwaka is identified as a key growth area, therefore it is essential that the District Plan embeds robust, future-focused infrastructure policies to safeguard environmental health, reduce flood risk, and support sustainable community development. • Stormwater provisions should be embedded across multiple chapters of the District Plan to reflect the cross-cutting nature of water infrastructure and its impact on land use, biodiversity, and hazard management. • These methods align with Te Mana o te Wai, reduce pollution, and enhance climate resilience. • Without firm direction in the District Plan, Kaipara risks being reactive to changing government policy rather than proactive in protecting its unique environment. • Māori and local lived experience are essential for designing resilient, place-based infrastructure. I support the inclusion of policy that reflects the knowledge and expertise of local Tangata Whenua. • Without enforceable obligations, stormwater systems risk becoming reactive rather than preventive. • Extreme weather and rising groundwater levels are already impacting infrastructure resilience: <ul style="list-style-type: none"> • Kaiwaka's wastewater treatment plant leaked into the Kaiwaka River following heavy rainfall in May 2025. • Urban runoff from SH1 contributes heavy metals, hydrocarbons, and sediment to receiving waters. • Flood-prone development and limited Council resourcing have resulted in unsafe footpaths, damaged properties, and insufficient drainage. • Insurance risks are climbing, with some properties potentially becoming uninsurable. • Recent events underscore the urgent need for improved infrastructure: <ul style="list-style-type: none"> • The May 2025 overflow of the Kaiwaka Wastewater Treatment Plant led to a health warning for the Kaiwaka and Otamatea rivers and Kaipara Harbour. • Urban development along SH1 has intensified runoff and pollutant loading. • Two open gullies currently drain unfiltered stormwater directly into the Kaiwaka River. • Many private properties have inadequate or unsafe stormwater systems, with limited Council capacity to enforce compliance • Kaiwaka's topography offers natural opportunities for bioretention and green infrastructure. These should be leveraged to: <ul style="list-style-type: none"> • Reduce runoff velocity and volume. • Filter contaminants before they reach the river. • Mitigate future leakage from the wastewater plan. • The submitter believes that addressing stormwater and wastewater issues in Kaiwaka through the District Plan is not only prudent, it is essential. The health of the river, the safety of the community, and the long-term viability of Kaiwaka as a growth node depend on it.
122.7	Amanda (Mandy) Harris	General	Amend	<p>ADD a policy to the Ecosystems and Indigenous Biodiversity chapter that Kaipara District Council shall not approve significant decisions relating to land use, infrastructure investment, or climate adaption within areas identified as vulnerable to climate change effects unless it has first obtained formal input from:</p> <ol style="list-style-type: none"> a. A qualified climate resilience specialist or professional planner with demonstrated experience in climate risk assessment; and b. A representative of mana whenua with ancestral ties to the affected land or waterway. 	<ul style="list-style-type: none"> • No reasons provided.

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				<p>AND</p> <p>ADD a new rule to the Ecosystems and Indigenous Biodiversity chapter that the provision shall apply to all decisions involving:</p> <ul style="list-style-type: none"> a. Infrastructure projects exceeding \$500,000 in value; b. Subdivisions of 10 or more lots; and <p>Any rezoning or plan change in areas identified as flood-prone, ecologically sensitive or culturally sensitive.</p>	
125.13	Madara Vilde	General	Amend	<p>ADD the identification and mapping of significant indigenous vegetation under Appendix 5 of the Northland Regional Policy Statement into the Proposed District Plan.</p>	<ul style="list-style-type: none"> Mapping these areas would provide certainty for landowners and effective ecological protection.
125.14	Madara Vilde	General	Amend	<p>ADD a new rule(s) limiting permitted indigenous vegetation clearance to 5 m² per site per calendar year within significant indigenous vegetation areas under Appendix 5 of the Northland Regional Policy Statement, with clearance exceeding this to be a restricted discretionary or discretionary activity, subject to offsetting and management plan requirements.</p>	<ul style="list-style-type: none"> A strict clearance limit in significant indigenous vegetation areas aligns with best practice precautionary principles for protecting highly sensitive and significant biodiversity. The new rule would ensure any impacts are fully assessed and appropriately mitigated or compensated, supporting long-term ecological viability.
149.145	Royal Forest and Bird Protection Society of New Zealand Incorporated	General	Amend	<p>ADD policies to the Ecosystems and Indigenous Biodiversity chapter regarding the following matters to give effect to the National Policy Statement for Indigenous Biodiversity (NPS-IB):</p> <ul style="list-style-type: none"> Indigenous biodiversity that is not significant (NPS-IB Policy 8) Identifying areas that support indigenous biodiversity (NPS-IB Policies 6, 15 and 17) Resilience of indigenous biodiversity to the effects of climate change (NPS-IB Policy 4) Increasing indigenous vegetation cover (NPS-IB Policy 14) Recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity (NPS-IB Objective and Policy 2) Specified highly mobile fauna (NPS-IB Policy 15) Required application of the effects management hierarchy to manage effects on indigenous biodiversity and demonstration of application by applicants in accordance with NPS-IB clauses 3.10, 3.11, 3.15 and 3.16. Required application of the biodiversity offsetting and compensation principles in NPS-IB Appendix 3 and 4. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter's overarching submission points seek new objectives, and related policies are added to the Proposed District Plan in order to give effect to the NPS-IB. New provisions should be a comprehensive package in order to ensure the protection and maintenance of indigenous biodiversity is achieved.
149.147	Royal Forest and Bird Protection Society of New Zealand Incorporated	General	Amend	<p>ADD a new controlled rule for ECO-R1.1.f. with the following matters of control:</p> <ul style="list-style-type: none"> An assessment applying the Regional Policy Statement significance criteria. Location of building platform/site and access requirements to minimise clearance of indigenous vegetation and protect areas of highest biodiversity values. <p>Need for any covenant to protect significant indigenous biodiversity values</p>	<ul style="list-style-type: none"> The rule permits a broad range of indigenous vegetation clearance activities without any requirements to manage adverse effects. As drafted, the rule risks undermining the protection and maintenance of indigenous biodiversity. It effectively provides blanket permitted activity status for clearance in sensitive areas, without applying an effects management or considering whether the vegetation supports significant ecological values. This is particularly concerning given the plan does not include an overlay of mapped significant areas which could be excluded from this rule. There is no requirement to assess the significance of vegetation being cleared, nor are there limits based on ecological context, habitat types, or connection to SNAs. This approach could result in the incremental loss of ecologically important indigenous vegetation across Kaipara.
149.148	Royal Forest and Bird Protection Society of New Zealand Incorporated	General	Amend	<p>ADD a catch-all rule for any use or development not provided for in the Ecosystems and Indigenous Biodiversity chapter as a discretionary activity.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter considers that new rules should be added to the Proposed District Plan as the National Policy Statement for Indigenous Biodiversity requires that adverse effects on indigenous biodiversity from new subdivision, use and development are avoided or managed (Policies 7 and 8). As proposed, the Ecosystems and Biodiversity Chapter does not give

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					effect to National Policy Statement for Indigenous Biodiversity direction.
149.39	Royal Forest and Bird Protection Society of New Zealand Incorporated	General	Amend	<p>ADD objectives to the Ecosystems and Indigenous Biodiversity chapter regarding the following matters to give effect to the National Policy Statement for Indigenous Biodiversity (NPS-IB):</p> <ul style="list-style-type: none"> Indigenous biodiversity that is not significant (NPS-IB Policy 8) Identifying areas that support indigenous biodiversity (NPS-IB Policies 6, 15 and 17) Resilience of indigenous biodiversity to the effects of climate change (NPS-IB Policy 4) Increasing indigenous vegetation cover (NPS-IB Policy 14) Recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity (NPS-IB Objective and Policy 2) Specified highly mobile fauna (NPS-IB Policy 15) Required application of the effects management hierarchy to manage effects on indigenous biodiversity and demonstration of application by applicants in accordance with NPS-IB clauses 3.10, 3.11, 3.15 and 3.16. Required application of the biodiversity offsetting and compensation principles in NPS-IB Appendix 3 and 4. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter's overarching submission points seek new objectives, and related policies are added to the Proposed District Plan in order to give effect to the NPS-IB. New provisions should be a comprehensive package in order to ensure the protection and maintenance of indigenous biodiversity is achieved.
149.45	Royal Forest and Bird Protection Society of New Zealand Incorporated	General	Amend	<p>ADD a new restricted discretionary Ecosystems and Indigenous Biodiversity rule for clearance and land disturbance that does not meet limit standards (as sought in the previous submission points) with the following matters of discretion:</p> <ul style="list-style-type: none"> Effects of vegetation clearance and associated land disturbance on indigenous biodiversity; Extent of clearance proposed and any practicable alternative locations or methods to avoid or reduce the extent of indigenous vegetation clearance and associated land disturbance; Measures proposed to avoid, remedy, mitigate, offset or compensate adverse effects on indigenous biodiversity values; Reasons for the indigenous vegetation clearance and associated land disturbance; and Any positive effects associated with the indigenous vegetation clearance and associated land disturbance. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter requests a new restricted discretionary rule is added to manage clearance and land disturbance that does not meet relevant standards.
149.47	Royal Forest and Bird Protection Society of New Zealand Incorporated	General	Amend	<p>ADD rules to the Ecosystems and Indigenous Biodiversity chapter to avoid and manage adverse effects from new subdivision, use and development, including:</p> <ul style="list-style-type: none"> A restricted discretionary rule for subdivision that is in or affects significant indigenous fauna or habitats, or indigenous biodiversity, with matters discretion restricted to: <ul style="list-style-type: none"> Effects on vegetation clearance and associated land disturbance on indigenous biodiversity; Extent of clearance proposed and any practicable alternative locations or methods to avoid or reduce the extent of indigenous vegetation clearance and associated land disturbance; Proposed measures to avoid, remedy, mitigate, offset or compensate adverse effects on indigenous biodiversity values; Reasons for the indigenous vegetation clearance and associated land disturbance; and 	<ul style="list-style-type: none"> The submitter considers that new rules should be added to the Proposed District Plan as the National Policy Statement for Indigenous Biodiversity (NPS-IB) requires that adverse effects on indigenous biodiversity from new subdivision, use and development are avoided or managed (Policies 7 and 8). As proposed, the Ecosystems and Indigenous Biodiversity chapter does not give effect to NPS-IB direction.

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				<ul style="list-style-type: none"> Any positive effects associated with the indigenous vegetation clearance and associated land disturbance. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	
206.14	D Leighton	General	Amend	AMEND restoration and pest management provisions to strengthen them, including enforceable conditions for replanting habitat enhancement.	<ul style="list-style-type: none"> Further measure to slow biodiversity decline.
206.3	D Leighton	General	Amend	ADD measurable biodiversity outcomes (e.g., establish net biodiversity gain or no-net-loss policies).	<ul style="list-style-type: none"> Supports the inclusion of overlays for Significant Natural Areas and provisions for biodiversity and habitat protection but considers expanding this protection can mitigate further biodiversity decline.
216.57	Cabra Mangawhai Ltd & Pro Land Matters Ltd	General	Amend	<p>AMEND the objectives, policies and rules in the Natural Environment Values chapter to give effect to the National Policy Statement for Indigenous Biodiversity and National Policy Statement for Freshwater.</p> <p>AND</p> <p>Any consequential amendments required.</p>	<ul style="list-style-type: none"> The submitter advises that the proposed district plan needs to effect to the National Policy Statement for Indigenous Biodiversity and National Policy Statement for Freshwater.
265.3	Environmental Defence Society Incorporated	General	Amend	<p>AMEND the Ecosystems and Indigenous Biodiversity Chapter to give effect to national direction and regional planning instruments.</p> <p>AND</p> <p>RETAIN the integrity of natural environment mapping ONL, ONF, HNC and ONC (inferred).</p> <p>AND</p> <p>AMEND relevant objectives, policies, rules and standards to ensure planning outcomes are achieved which will not jeopardise the integrity of Kaipara's natural environment.</p> <p>AND</p> <p>Any similar, consequential or alternative relief as is necessary to address the issues raised.</p>	<ul style="list-style-type: none"> The submitter opposes the Ecosystems and Indigenous Biodiversity chapter in part as it does not include mapped areas of significant indigenous vegetation and significant habitats of indigenous fauna - contrary to the National Policy Statement for Indigenous Biodiversity (NPS-IB) and the National Policy Statement for Freshwater Management. It is noted that the NPS-IB states that each territorial authority must undertake a district-wide assessment to identify area of significant indigenous vegetation or significant habitat of indigenous fauna that qualify as Significant Natural Areas (SNAs). This has not been done and, without SNA mapping, the submitter does not consider that the Proposed District Plan gives effect to national direction or achieves the purpose of the Resource Management Act. Relying on future plan changes is not a solution. Rather, NPS-IB requirements should be incorporated into the Proposed District Plan now to enable the drafting of associated objectives, policies, rules and standards to ensure SNA's can be identified, protected, managed and restored (as required by National Planning Standards chapter 7, para 19). The same goes in regard to the National Policy Statement for Freshwater Management 2020 (NPS-FM). The submitter notes that a series of other natural environment features are mapped within the Proposed District Plan and this is supported. This includes ONL, ONF, HNC and ONC. However, it is integral that these features should continue to be protected and not be diminished (unless they no longer meet the required threshold). The submitter requests that the Ecosystems and Indigenous Biodiversity, Natural Character, Natural Features and Landscapes Chapters are re-drafted to give effect to national direction and the Resource Management Act. Within these chapters, the following issues need to be considered: <ul style="list-style-type: none"> Subdivision needs to be referred to alongside use and development. Regulatory thresholds should be strengthened. Activity statuses need to be 'ratcheted up'. Provision for earthworks and indigenous vegetation clearance should not be annually. Matters of control and discretion should provide for the protection, management and restoration of indigenous biodiversity and outstanding landscapes and features. The omissions in Proposed District Plan framework risk the loss of important natural values which require protection for future generations. The submitter suggests that provisions the same or similar to Auckland Council's natural environment

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					mapping are included within the Proposed District Plan (provided in Attachment 1 of the submission).
292.59	Transpower New Zealand Limited	General	Amend	AMEND the Ecosystems and Indigenous Biodiversity chapter to give effect to the National Policy Statement on Electricity Transmission. AND Alternative or consequential relief as may be necessary to fully achieve the relief sought by the submission.	<ul style="list-style-type: none"> Managing the effects of vegetation on the National Grid is required to reduce risks to the National Grid. There is a legal requirement to maintain its lines to minimise tree interruption to the supply of electricity. The identification of rules relating to indigenous vegetation are relevant to Transpower (as they determine the need for consent under the National Environmental Standards for Electricity Transmission Activities).
304.2	Director General of Conservation	General	Amend	ADD the National Pest Management Plan rules for kauri dieback into the Proposed District Plan for subdivision, roadworks and earthworks activities around kauri. AND Any further or alternative relief to like effect to that sought.	<ul style="list-style-type: none"> The submitter requests that the National Pest Management Plan for kauri dieback is adopted into the Proposed District Plan.
304.63	Director General of Conservation	General	Amend	ADD Ecosystems and Indigenous Biodiversity objectives, policies and rules (inferred) which recognise and promote the protection of significant indigenous vegetation and significant habitats of indigenous fauna as per Section 6(c) Resource Management Act, the National Policy Statement for Indigenous Biodiversity and the Northland Regional Policy Statement using the areas identified in Attachment 2 of the submission as a guide. AND Any further or alternative relief to like effect to that sought.	<ul style="list-style-type: none"> The submitter notes that the Overview in the Ecosystems and Indigenous Biodiversity chapter confirms the absence of mapped areas of significant indigenous vegetation and significant habitats of indigenous fauna at this point in time and states their inclusion will occur via a future plan change in accordance with national policy statements. Though this approach aligns with the Resource Management (Freshwater and Other Matters) Amendment Act, which removed the requirement for the mapping of NPSIB SNAs, the Council still has statutory obligations under s6(c) of the Resource Management Act to protect areas with significant indigenous vegetation and significant habitats of indigenous fauna. Therefore, the submitter requests that the information in the Wildlands report (refer Attachment 2) is used throughout the Proposed District Plan to aid in the identification and protection of such areas.
304.66	Director General of Conservation	General	Amend	ADD a new objective to the Ecosystems and Indigenous Biodiversity chapter as follows: <u>Recognise and provide for the relationship of tangata whenua and their culture and traditions with indigenous vegetation and fauna.</u> AND Any further or alternative relief to like effect to that sought.	<ul style="list-style-type: none"> The submitter seeks this new Ecosystems and Indigenous Biodiversity objective to give effect to the Resource Management Act, the National Policy Statement for Indigenous Biodiversity and to Objective 3.12 of the Northland Regional Policy Statement. Moreover, this new objective would link to ECO-P4 if amendments sought by the submitter are made.
304.71	Director General of Conservation	General	Amend	ADD a new policy to the Ecosystems and Indigenous Biodiversity chapter as follows: <u>ECO-Px Areas of Significant Indigenous Biodiversity Require activities not provided for in ECO-R1 to obtain from a suitably qualified and experienced ecologist confirming that the indigenous vegetation proposed to be cleared does not meet the criteria in Appendix 5 of the Northland Regional Policy Statement 2016 (Areas of significant indigenous vegetation and significant habitats of indigenous fauna to undertake clearance large scale clearance of indigenous vegetation).</u> AND Any further or alternative relief to like effect to that sought.	<ul style="list-style-type: none"> The submitter requests that a new Ecosystems and Indigenous Biodiversity policy is included which outlines the specific assessment criteria of the Northland Regional Policy Statement Appendix 5 to ensure applications that do not comply with ECO-R2 are assessed consistently. Moreover, the proposed policy will support the implementation of ECO-O1.
304.72	Director General of Conservation	General	Amend	ADD a note to the Ecosystems and Indigenous Biodiversity rules as follows: <u>Pursuant to Section 86B(3) of the Resource Management Act, the following rules that protect areas of significant indigenous vegetation or areas of significant habitats of indigenous fauna have immediate legal effect: ECO-R1 to ECO-R2.</u> AND Any alternative or consequential relief.	<ul style="list-style-type: none"> As drafted, the Proposed District Plan does not acknowledge the immediate legal effect of rules that protect areas of significant indigenous vegetation or areas of significant habitats of indigenous fauna. If the permitted pathway in ECO-R2.b. is included, as requested by the submitter, then only ECO-R2.a. can have legal effect.
319.11	J Warden	General	Amend	AMEND the permitted activity standards in the Ecosystems and Indigenous Biodiversity chapter to reflect the zones so that they are less permissible and confusing.	<ul style="list-style-type: none"> Permitted activity standards are too permissible and confusing.

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332.10	Northland Regional Council	General	Amend	<p>AMEND Ecosystems and Indigenous Biodiversity provisions to:</p> <ul style="list-style-type: none"> Safeguard Northland's ecological integrity by protecting areas of significant indigenous vegetation and significant habitats of indigenous fauna; Maintain the extent and diversity of indigenous ecosystems and habitats in the district; and <p>Enhance indigenous ecosystems and habitats, particularly where this contributes to the reduction in the overall threat status of regionally and nationally threatened species.</p>	<ul style="list-style-type: none"> Though the Ecosystems and Indigenous Biodiversity Overview states that "there continues to be cumulative loss of indigenous biodiversity on private land", the submitter considers that Proposed District Plan provisions generally take an enabling approach to managing activities with potential adverse effects on biodiversity. There should be additional measures to better manage potential adverse effects on biodiversity in order to meet the Northland Regional Policy Statement's objective of maintaining and, where possible, enhancing biodiversity values.
332.18	Northland Regional Council	General	Amend	<p>ADD a new policy to the Ecosystems and Indigenous Biodiversity chapter as follows: <u>ECO-XX Protection and maintenance of indigenous biodiversity</u> <u>Ensures no net loss of indigenous biodiversity by controlling: the disturbance of land, clearance of vegetation and introduction or keeping of species with recognised pest potential.</u></p>	<ul style="list-style-type: none"> A new Ecosystems and Indigenous Biodiversity chapter policy is proposed to accompany the relief sought by the submitter regarding discretionary activity subdivision and to reflect Northland Regional Council policy direction on no net biodiversity loss.
332.22	Northland Regional Council	General	Amend	<p>ADD an advice note to the Ecosystems and Indigenous Biodiversity chapter as follows: <u>Advice Note on the application of objectives and policies: Regard must be had to the NPS-IB, when considering an application for a resource consent.</u></p>	<ul style="list-style-type: none"> An advice note is sought by the submitter to highlight the requirement to give effect to National Policy Statement for Indigenous Biodiversity objectives and policies.
333.6	NZ Fairy Tern Trust	General	Amend	<p>ADD reference to the National Policy Statement for Indigenous Biodiversity in the Proposed District Plans with reference to the introduction of Significant Natural Areas.</p>	<ul style="list-style-type: none"> The submitter has requested the above relief for the following reasons: <ul style="list-style-type: none"> They support the inclusion of policies that will protect the natural and unique features of the Kaipara District. Northland Regional Council's ecological areas are a good starting point, but Kaipara District Council will need to meet the requirements of the National Policy Statement for Indigenous Biodiversity. Significant Natural Areas have not been mentioned in the Proposed District Plan.
149.37	Royal Forest and Bird Protection Society of New Zealand Incorporated	General	Oppose	<p>AMEND 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. OR ADD an objective regarding the identification of areas through new subdivision, use and development proposals using the Regional Policy Statement Appendix 5 criteria. AND ADD a method and provide a specified timeframe for identifying significant natural areas across the District and a schedule included within the plan and maps. AND Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes the Proposed District Plan not having identified areas of significant indigenous vegetation or significant habitats of indigenous fauna. The submitter acknowledges that recent Resource Management Act amendments have temporarily paused the requirement to identify Significant Natural Areas (SNAs) under the National Policy Statement for Indigenous Biodiversity (NPS-IB), it does not consider this 'pause' removes Council's existing obligations under the Resource Management Act, NPS-IB and Regional Policy Statement (RPS). The RPS provides clear direction on safeguarding significant indigenous vegetation and the habitats of indigenous fauna. Specifically, Objective 3.4 of the RPS, which s75(3)(c) Resource Management Act requires the Proposed District Plan gives effect to. Moreover, Appendix 5 of the RPS sets out criteria for determining significance. The submitter considers that Identifying SNAs within the Kaipara District is critical to ensure such areas are protected in order to maintain indigenous biodiversity. If SNAs are not mapped, this reduces clarity for landowners and decision-makers, therefore increasing the risk of unintentional biodiversity loss.
337.4	Aoroa Farms	General	Oppose	<p>AMEND the Ecosystems and Indigenous and Biodiversity rules to prevent vegetation clearance except for purposes already stated under rule ECO-R1.</p>	<ul style="list-style-type: none"> The submitter opposes the provisions of the Ecosystems and Indigenous Biodiversity for the following reasons: <ul style="list-style-type: none"> The permitted allowance for vegetation clearance does not align with the overview, objectives and/or policies of the proposed district plan. The maintenance and enhancement of indigenous biodiversity and vegetation need to be encouraged.

Proposed Kaipara District Plan

Summary of Submissions for the topic of: Ecosystems and Indigenous Biodiversity (in Provision order)

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
					<ul style="list-style-type: none"> Any clearance will adversely affect the native ecosystem. Any unjustified vegetation clearance is irresponsible given that indigenous ecosystems are in decline. Adverse cumulative effect. The permitted clearance allowance of 1000m² is generous and not in line with other District Plan as stated within the s32 Report on Biodiversity.
20.3	Christine Silvester	General	Support	RETAIN indigenous vegetation protection in the Proposed District Plan.	<ul style="list-style-type: none"> The submitter supports this due to Kiwi living in the 'Bream Tail Farm', and in 'The Sanctuary'.
263.11	Daytona Trust	General	Support	RETAIN ECO-O1. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The objective appropriately seeks to protect, promote and enable the restoration of indigenous biodiversity.
263.12	Daytona Trust	General	Support	RETAIN ECO-P1. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The policy appropriately gives effect to the requirements of the New Zealand Coastal Policy Statement and the Regional Policy Statement and recognises the role of landowners as stewards in the restoration of indigenous biodiversity; enabling the removal or management of pest, plant and animal species and the application also of non-regulatory methods to encourage the protection, maintenance and restoration of indigenous biodiversity.
263.60	Daytona Trust	General	Support	RETAIN ECO-O2. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The objective appropriately seeks to protect, promote and enable the restoration of indigenous biodiversity.
263.61	Daytona Trust	General	Support	RETAIN ECO-O3. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The objective appropriately seeks to protect, promote and enable the restoration of indigenous biodiversity.
263.62	Daytona Trust	General	Support	RETAIN ECO-O4. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The objective appropriately seeks to protect, promote and enable the restoration of indigenous biodiversity.
263.63	Daytona Trust	General	Support	RETAIN ECO-P2. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The policy appropriately gives effect to the requirements of the New Zealand Coastal Policy Statement and the Regional Policy Statement and recognises the role of landowners as stewards in the restoration of indigenous biodiversity; enabling the removal or management of pest, plant and animal species and the application also of non-regulatory methods to encourage the protection, maintenance and restoration of indigenous biodiversity.
263.64	Daytona Trust	General	Support	RETAIN ECO-P3. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The policy appropriately gives effect to the requirements of the New Zealand Coastal Policy Statement and the Regional Policy Statement and recognises the role of landowners as stewards in the restoration of indigenous biodiversity; enabling the removal or management of pest, plant and animal species and the application also of non-regulatory methods to encourage the protection, maintenance and restoration of indigenous biodiversity.
263.65	Daytona Trust	General	Support	RETAIN ECO-P4. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The policy appropriately gives effect to the requirements of the New Zealand Coastal Policy Statement and the Regional Policy Statement and recognises the role of landowners as stewards in the restoration of indigenous biodiversity; enabling the removal or management of pest, plant and animal species and the application also of non-regulatory methods to encourage the protection, maintenance and restoration of indigenous biodiversity.
263.66	Daytona Trust	General	Support	RETAIN ECO-P5. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> The policy appropriately gives effect to the requirements of the New Zealand Coastal Policy Statement and the Regional Policy Statement and recognises the role of landowners as stewards in the

Proposed Kaipara District Plan

Summary of Submissions for the topic of: Ecosystems and Indigenous Biodiversity (in Provision order)

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
					restoration of indigenous biodiversity; enabling the removal or management of pest, plant and animal species and the application also of non-regulatory methods to encourage the protection, maintenance and restoration of indigenous biodiversity.
301.29	Channel Terminal Services Limited	General	Support	RETAIN Ecosystems and Indigenous Biodiversity chapter as notified. AND Any ancillary, or alternative and consequential relief as necessary or appropriate.	<ul style="list-style-type: none"> The submitter supports the approach taken in the Ecosystems and Indigenous Biodiversity chapter, in particular, Policy ECO-P2. Further, the submitter considers that ECO-R1.1.1.ii. reflects that a pragmatic approach is required to allow vegetation clearance for operation, repair or maintenance existing infrastructure.
136.47	Federated Farmers of New Zealand (Inc) - Northland Province	Overview	Support	RETAIN the Overview of the Ecosystems and Indigenous Biodiversity chapter as notified. OR With wording that has similar intent and effect. AND Any consequential amendments.	<ul style="list-style-type: none"> The submitter supports the Ecosystems and Indigenous Biodiversity Overview and the recognition given to landowners to protect and restore indigenous biodiversity on private land. The submitter supports the approach of not including mapped areas of significant indigenous vegetation and significant habitats of indigenous fauna at this time given the imminent changes to the National Policy Statement for Indigenous Biodiversity signalled by central government.
136.57	Federated Farmers of New Zealand (Inc) - Northland Province	Notes	Support	DELETE Note 1 in the Ecosystems and Indigenous Biodiversity chapter. AND AMEND the Ecosystems and Indigenous Biodiversity provisions by relocating the rules and associated policies for indigenous vegetation clearance that are located in the Coastal Environment, Natural Character, and Natural Features and Landscapes chapters, into the ECO chapter. This would include the following provisions - NATC-P2, NAT-R4, NATC-S3, NFL-R3, NFL-R7 and NFL-S5. (Lodged under separate submission numbers 136.58 - 136.63 and 136.193).	<ul style="list-style-type: none"> Submitter considers that the Proposed District Plan may be easier to use if all rules for indigenous vegetation clearance, including those in the overlays, are located in the Ecosystems and Indigenous Biodiversity chapter. The National Planning Standards gives mandatory direction for the layout of District Plans. Section 7, clause 19 states that matters relating to the maintenance of biological diversity must be located in the Ecosystems and Indigenous Biodiversity chapter, although clause 20 also provides for provisions to protect natural character to be located in the Natural Character chapter. Section 7, clause 28 (a) allows the Coastal Environment chapter to set out provisions for implementing coastal environment functions and duties, while (c) provides for cross-referencing to specific coastal provisions that may be located in other chapters.