

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.

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Summary of Submissions for the topic of: Financial Contributions (in Provision order)

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
26.7	Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ	FC-O1	Support	RETAIN FC-O1 as notified. AND Any alternative relief and/or consequential amendments.	<ul style="list-style-type: none"> The objective supports developers providing and meeting the costs of infrastructure to support development.
216.53	Cabra Mangawhai Ltd & Pro Land Matters Ltd	FC-O2	Support	RETAIN the policies in Financial Contributions about the fair and reasonable share of costs, including FC-O2.	<ul style="list-style-type: none"> The submitter supports the policies regarding fair and reasonable share of costs of upgrading.
212.7	BA & JK Paton Ltd	FC-P2	Amend	PROVIDE the following for financial contributions in the context of FC-P2: <ul style="list-style-type: none"> Clarification that financial contributions are only required for specific local infrastructure effects (including reserves). Ensure that Council's Development Contribution Policy will be used to address broader rural infrastructure needs. Ensure greater transparency, local reinvestment, and alignment with development contributions. Targeted, site-specific contributions for 430 Oneriri Road, Kaiwaka AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps. Specifically, the submitter has sought this relief for the following reasons: <ul style="list-style-type: none"> Financial contribution provisions lack clarity and create uncertainty for rural landowners/developers. Current provisions require a 5% land value contribution despite no identified shortage of open space in rural areas like Oneriri Peninsula. Assumption that new residents will use district-wide infrastructure is too broad. No clear requirement for funds to be reinvested in the locality where they are collected. Reinvestment catchment is vague, undermining local benefit and potentially disadvantaging rural areas. Provisions overlook cumulative growth impacts, limiting support for strategic infrastructure needs (e.g., transport, water, resilience).
217.32	Cato Bolam Consultants Limited	FC-P2	Oppose	AMEND FC-P2 to make use of development contributions only. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> The submitter has opposed this policy in part, and requested the above relief for the following reasons: It is not clear that developers shall not be double charged for overlapping off-site network works already covered under development contributions, by specifying a credit mechanism or threshold in the financial contributions framework to limit risking objections under s108AA of the Resource Management Act. Financial contributions charged are not ringfenced to be spent in the area where it has been generated from. Financial contributions create uncertainty for developers. Financial contributions target individual effects rather than the cumulative growth forecast across a district, so they may not fully fund large capacity upgrades.
322.8	Kāinga Ora - Homes and Communities	FC-P2	Oppose	DELETE FC-P2 in its entirety. AND Any further, alternative or consequential relief as necessary to fully achieve the relief sought.	<ul style="list-style-type: none"> The submitter opposes FC-P2 and requests it is deleted. The requirement for financial contributions for infrastructure / services when Council collect development contributions for these activities is 'double dipping'.
26.8	Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ	FC-P2	Support	RETAIN FC-P2 as notified. AND Any alternative relief and/or consequential amendments.	<ul style="list-style-type: none"> The policy and others collectively support developers providing and meeting the costs of infrastructure to support development.
212.8	BA & JK Paton Ltd	FC-P3	Amend	PROVIDE the following for financial contributions in the context of FC-P3: <ul style="list-style-type: none"> Clarification that financial contributions are only required for specific local infrastructure effects (including reserves). Ensure that Council's Development Contribution Policy will be used to address broader rural infrastructure needs. Ensure greater transparency, local reinvestment, and alignment with development contributions. 	<ul style="list-style-type: none"> The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps. Specifically, the submitter has sought this relief for the following reasons: <ul style="list-style-type: none"> Financial contribution provisions lack clarity and create uncertainty for rural landowners/developers. Current provisions require a 5% land value contribution despite no identified shortage of open space in rural areas like Oneriri Peninsula.

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				<ul style="list-style-type: none"> Targeted, site-specific contributions for 430 Oneriri Road, Kaiwaka. <p>AND</p> <p>Any other relief that is consistent with and/or consequential to the submission.</p>	<ul style="list-style-type: none"> Assumption that new residents will use district-wide infrastructure is too broad. No clear requirement for funds to be reinvested in the locality where they are collected. Reinvestment catchment is vague, undermining local benefit and potentially disadvantaging rural areas. Provisions overlook cumulative growth impacts, limiting support for strategic infrastructure needs (e.g., transport, water, resilience).
217.33	Cato Bolam Consultants Limited	FC-P3	Oppose	<p>AMEND FC-P3 to make use of development contributions only.</p> <p>AND</p> <p>Any other relief that is consistent with and/or consequential to the submission.</p>	<ul style="list-style-type: none"> The submitter has opposed this policy in part, and requested the above relief for the following reasons: It is not clear that developers shall not be double charged for overlapping off-site network works already covered under development contributions, by specifying a credit mechanism or threshold in the financial contributions framework to limit risking objections under s108AA of the Resource Management Act. Financial contributions charged are not ringfenced to be spent in the area where it has been generated from. Financial contributions create uncertainty for developers.
26.9	Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ	FC-P3	Support	<p>RETAIN FC-P3 as notified.</p> <p>AND</p> <p>Any alternative relief and/or consequential amendments.</p>	<ul style="list-style-type: none"> This policy and others collectively support developers providing and meeting the costs of infrastructure to support development.
322.9	Kāinga Ora - Homes and Communities	FC-P4	Support	<p>RETAIN FC-P4 as notified.</p> <p>AND</p> <p>Any further, alternative or consequential relief as necessary to fully achieve the relief sought.</p>	<ul style="list-style-type: none"> The submitter supports this policy as notified.
26.10	Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ	FC-P5	Support	<p>RETAIN FC-P5 as notified.</p> <p>AND</p> <p>Any alternative relief and/or consequential amendments.</p>	<ul style="list-style-type: none"> This policy and others collectively support developers providing and meeting the costs of infrastructure to support development.
212.9	BA & JK Paton Ltd	FC-P8	Amend	<p>PROVIDE the following for financial contributions in the context of FC-P8:</p> <ul style="list-style-type: none"> Clarification that financial contributions are only required for specific local infrastructure effects (including reserves). Ensure that Council's Development Contribution Policy will be used to address broader rural infrastructure needs. Ensure greater transparency, local reinvestment, and alignment with development contributions. Targeted, site-specific contributions for 430 Oneriri Road, Kaiwaka. <p>AND</p> <p>Any other relief that is consistent with and/or consequential to the submission.</p>	<ul style="list-style-type: none"> The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps. Specifically, the submitter has sought this relief for the following reasons: <ul style="list-style-type: none"> Financial contribution provisions lack clarity and create uncertainty for rural landowners/developers. Current provisions require a 5% land value contribution despite no identified shortage of open space in rural areas like Oneriri Peninsula. Assumption that new residents will use district-wide infrastructure is too broad. No clear requirement for funds to be reinvested in the locality where they are collected. Reinvestment catchment is vague, undermining local benefit and potentially disadvantaging rural areas. Provisions overlook cumulative growth impacts, limiting support for strategic infrastructure needs (e.g., transport, water, resilience).
217.34	Cato Bolam Consultants Limited	FC-P8	Oppose	<p>AMEND FC-P8 to make use of development contributions only.</p>	<ul style="list-style-type: none"> The submitter has opposed this policy in part, and requested the above relief for the following reasons: It is not clear that developers shall not be double charged for overlapping off-site network works already covered under development contributions, by specifying a credit mechanism or threshold in the financial contributions framework to limit risking objections under s108AA of the Resource Management Act.

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					<ul style="list-style-type: none"> Financial contributions charged are not ringfenced to be spent in the area where it has been generated from. Financial contributions create uncertainty for developers.
26.11	Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ	FC-R1	Amend	AMEND the cross references in FC-R1 to correctly reference standards FC-S1-S6. AND Any alternative relief and/or consequential amendments.	<ul style="list-style-type: none"> Rule FC-R1 is supported but it requires some cross references to the standards to be corrected as they refer to incorrect provisions. In particular, FC-S6 is the correct clause for contributions to network utilities but is referred to in the rule as S8 which is not a standard.
165.8	TAP Adventures Ltd	FC-S5	Oppose	AMEND Rule FC-S5.4.a.i. and ii. so that a set contribution amount is stated. OR AMEND FC-S5.4.a.i. and ii. as follows: 4. No contribution in money required under these provisions shall exceed the following amounts: a. Subdivision of land for principally residential purposes or rural purposes where the lots can accommodate a residential dwelling: i. Up to <u>2.5%</u> of the value of each additional lot that is 4000m ² or less. ii. Lots of more than 4000m ² - the contribution will be assessed <u>on the basis of a 'nominal' 4000m² site</u> up to <u>2.5%</u> of the value.	<ul style="list-style-type: none"> The formula in FC-S5.4.a. is confusing and appears to result in a larger contribution than the Operative District Plan formula. The formula approach results in a lack of certainty for both applicants and Council's planning and budgeting. The 5% of lot value is excessive and should be halved.
26.12	Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ	FC-S6	Support	RETAIN FC-S6 as notified. AND Any alternative relief and/or consequential amendments.	<ul style="list-style-type: none"> The standard as notified is supported.
322.10	Kāinga Ora - Homes and Communities	FC-S6	Oppose	DELETE FC-S6 in its entirety. AND Any further, alternative or consequential relief as necessary to fully achieve the relief sought.	<ul style="list-style-type: none"> The submitter questions the requirement for financial contribution for installing or upgrading network utilities (including wastewater supply, stormwater disposal and water supply) when Council collect development contributions for these activities. This 'double dipping' is opposed.
149.13	Royal Forest and Bird Protection Society of New Zealand Incorporated	General	Amend	ADD Policies which recognise the principles and criteria for biodiversity offsetting and compensation, as well as the limits to when such measures can be applied. Provisions should include clear reference to the application of the Ecosystems and Biodiversity chapter, if financial contributions extend to biodiversity offsetting and compensation. OR AMEND Policies to recognise the principles and criteria for biodiversity offsetting and compensation, as well as the limits to when such measures can be applied. Provisions should be amended to include clear reference to the application of the Ecosystems and Biodiversity chapter, if financial contributions extend to biodiversity offsetting and compensation. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> The submitter opposes Financial Contribution Objectives and Policies (inferred) in part and does not consider it clear whether financial contributions are intended as to include biodiversity compensation. If biodiversity compensation is included, then guidance is required as to how offset and compensation principles within the National Policy Statement on Indigenous Biodiversity and National Policy Statement on Freshwater Management apply. Limitations to when biodiversity offsetting or compensation is appropriate should also be recognised.
151.10	Mangawhai Bush Estate	General	Amend	AMEND the Proposed District Plan so that any contributions are targeted and site specific in regard to 1083 Kaiwaka-Mangawhai Road.	<ul style="list-style-type: none"> The financial contributions within the District Plan do not allow for discretion of financial contributions to be applied and do not allow for funds to be ring fenced to the area of effect for the activity creating the effect, therefore there will continue to be social and environmental infrastructure areas created outside the areas of need. It is more appropriate to use development contributions which are specific to an area. The methods should refer to the Council's Development Contributions Policy.
151.4	Mangawhai Bush Estate	General	Amend	DELETE the Financial Contribution rules. AND	<ul style="list-style-type: none"> The financial contributions rules are unclear and are a double up as Council also has a development contributions policy which can be reviewed more

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				PROVIDE a method that relies on Council's Development Contribution Policy.	<p>frequently than the District Plan and aligns with Council's long-term planning.</p> <ul style="list-style-type: none"> The financial contributions within the District Plan do not allow for discretion of financial contributions to be applied and do not allow for funds to be ring fenced. It is more appropriate to use development contributions which are specific to an area. The methods should refer to the Council's Development Contributions Policy.
212.2	BA & JK Paton Ltd	General	Amend	<p>AMEND the Financial Contribution provisions to confirm that contribution will only be required where there is a specific requirement to address effects on local infrastructure created by a development, including reserves.</p> <p>AND</p> <p>CONFIRM that Council's Development Contribution Policy will be relied upon to address wider rural infrastructure requirements.</p> <p>AND</p> <p>PROVIDE greater transparency, local reinvestment commitments, and alignment with development contributions to avoid inequity and uncertainty for those seeking to deliver well-planned rural lifestyle outcomes.</p> <p>AND</p> <p>PROVIDE targeted and site-specific contributions relating to 430 Oneriri Road, Kaiwaka.</p> <p>AND</p> <p>Any other relief that is consistent with and/or consequential to the submission.</p>	<ul style="list-style-type: none"> The proposed financial contribution provisions lack clarity and create uncertainty for landowners and development in Rural Lifestyle Areas such as Oneriri Peninsula. The Long-term Plan has not identified the shortage of reserve or social infrastructure within rural areas even though all development has been charged with a 5% value of the building site for each new lot created on the assumption that the new residents will utilise the reserve infrastructure throughout the district. Provisions do not require that funds collected be reinvested in the same location from which they come from. The catchment of reinvestment is vague and broad. This undermines the principle of local benefit and may disadvantage areas like Oneriri, where infrastructure needs are specific and context dependent. Financial contributions focus on the effects of individual developments rather than accounting for cumulative growth anticipated across the district and therefore may not be sufficient to support strategic infrastructure upgrades required.
216.52	Cabra Mangawhai Ltd & Pro Land Matters Ltd	General	Amend	<p>AMEND the Financial Contributions provisions to be a separate chapter rather than included within Strategic Directions.</p> <p>AND</p> <p>AMEND the Financial Contributions provisions to provide consistency of terminology between subdividers and developers.</p> <p>AND</p> <p>ADD further guidance to the Financial Contribution provisions for the alignment of infrastructure and development with the Managed Growth Area</p>	<ul style="list-style-type: none"> Financial Contributions need to be part of a separate chapter, as it contains rules which means that it does not align with the strategic requirements of the National Planning Standards. There is no consistency of terminology between developers and subdividers.
217.189	Cato Bolam Consultants Limited	General	Amend	<p>ADD a specific clause to the Financial Contributions provisions for the Council to waive or discount financial contributions where infrastructure or reserves acquisition is unnecessary or inappropriate for the specific development.</p> <p>AND</p> <p>Any relief that is consistent with and/or consequential to the submission.</p>	<ul style="list-style-type: none"> The proposed financial contribution provisions lack clarity and create uncertainty for landowners and developers, particularly in rural areas. The Operative and Proposed District Plans state that 'there must be a demonstrable current or foreseen future shortage of open space in a particular area' before land or cash is taken, but the Long-Term Plan has not identified this shortage of reserve or social infrastructure within rural areas. The provisions do not appear to require that funds collected be reinvested in the same locality from which they are derived. The catchment of reinvestment is also very vague and broad, making it difficult to determine its true value to the communities created in rural areas. Financial contributions also focus narrowly on the effects of individual developments, rather than accounting for the cumulative growth anticipated across the district. To avoid inequity and uncertainty for those seeking to deliver well-planned rural lifestyle outcomes.
217.190	Cato Bolam Consultants Limited	General	Amend	<p>AMEND the Financial Contributions provisions to confirm contributions must avoid "double charging"; focus on funding through the Development Contribution Policy process.</p> <p>AND</p> <p>Any relief that is consistent with and/or consequential to the submission.</p>	<ul style="list-style-type: none"> The proposed financial contribution provisions lack clarity and create uncertainty for landowners and developers, particularly in rural areas. The Operative and Proposed District Plans state that 'there must be a demonstrable current or foreseen future shortage of open space in a particular area' before land or cash is taken, but the Long-Term Plan

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					<p>has not identified this shortage of reserve or social infrastructure within rural areas.</p> <ul style="list-style-type: none"> The provisions do not appear to require that funds collected be reinvested in the same locality from which they are derived. The catchment of reinvestment is also very vague and broad, making it difficult to determine its true value to the communities created in rural areas. Financial contributions also focus narrowly on the effects of individual developments, rather than accounting for the cumulative growth anticipated across the district. To avoid inequity and uncertainty for those seeking to deliver well-planned rural lifestyle outcomes.
217.191	Cato Bolam Consultants Limited	General	Amend	<p>AMEND the Financial Contributions provisions to provide more clarity on where development contributions will apply in rural areas and what gaps financial contributions are meant to cover.</p> <p>AND</p> <p>Any relief that is consistent with and/or consequential to the submission.</p>	<ul style="list-style-type: none"> The proposed financial contribution provisions lack clarity and create uncertainty for landowners and developers, particularly in rural areas. The Operative and Proposed District Plans state that 'there must be a demonstrable current or foreseen future shortage of open space in a particular area' before land or cash is taken, but the Long-Term Plan has not identified this shortage of reserve or social infrastructure within rural areas. The provisions do not appear to require that funds collected be reinvested in the same locality from which they are derived. The catchment of reinvestment is also very vague and broad, making it difficult to determine its true value to the communities created in rural areas. Financial contributions also focus narrowly on the effects of individual developments, rather than accounting for the cumulative growth anticipated across the district. To avoid inequity and uncertainty for those seeking to deliver well-planned rural lifestyle outcomes.
217.192	Cato Bolam Consultants Limited	General	Amend	<p>PROVIDE greater transparency, local reinvestment commitments and alignment with development contributions to avoid inequity and uncertainty for those seeking to deliver well-planned rural lifestyle outcomes.</p> <p>AND</p> <p>Any relief that is consistent with and/or consequential to the submission.</p>	<ul style="list-style-type: none"> The proposed financial contribution provisions lack clarity and create uncertainty for landowners and developers, particularly in rural areas. The Operative and Proposed District Plans state that 'there must be a demonstrable current or foreseen future shortage of open space in a particular area' before land or cash is taken, but the Long-Term Plan has not identified this shortage of reserve or social infrastructure within rural areas. The provisions do not appear to require that funds collected be reinvested in the same locality from which they are derived. The catchment of reinvestment is also very vague and broad, making it difficult to determine its true value to the communities created in rural areas. Financial contributions also focus narrowly on the effects of individual developments, rather than accounting for the cumulative growth anticipated across the district. To avoid inequity and uncertainty for those seeking to deliver well-planned rural lifestyle outcomes.
217.2	Cato Bolam Consultants Limited	General	Amend	<p>AMEND the Financial Contribution provisions to confirm that contribution will only be required where there is a specific requirement to address effects on local infrastructure created by a development, including reserves and rely on Council's Development Contribution Policy to address the wider rural infrastructure requirements.</p> <p>AND</p> <p>Any relief that is consistent with and/or consequential to the submission.</p>	<ul style="list-style-type: none"> The proposed financial contribution provisions lack clarity and create uncertainty for landowners and developers, particularly in rural areas. The Operative and Proposed District Plans state that 'there must be a demonstrable current or foreseen future shortage of open space in a particular area' before land or cash is taken, but the Long-Term Plan has not identified this shortage of reserve or social infrastructure within rural areas. The provisions do not appear to require that funds collected be reinvested in the same locality from which they are derived. The catchment of reinvestment is also very vague and broad, making it difficult to determine its true value to the communities created in rural areas. Financial contributions also focus narrowly on the effects of individual developments, rather than

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					<ul style="list-style-type: none"> accounting for the cumulative growth anticipated across the district. To avoid inequity and uncertainty for those seeking to deliver well-planned rural lifestyle outcomes.
222.40	Kaipara District Council	General	Amend	AMEND the Financial Contributions calculation formulae and justifications; AND Consider adding Financial Contributions for permitted activities as provided for in the Act.	<ul style="list-style-type: none"> Legislation amendments provide for financial contributions on permitted activities. Currently the proposed plan does not include any specific permitted activities and further work would need to be undertaken before including provisions.
50.32	Evolve Planning and Landscape Architecture	General	Oppose	DELETE the Financial Contributions rules and provide a method that relies on Council's Development Contributions Policy.	<ul style="list-style-type: none"> Development contributions are better dealt with outside the District Plan. The methods should refer to the Council's Development Contributions Policy.
117.4	Greg Moore	General	Oppose	AMEND contributions in the Financial Contributions chapter to be clear, easy to understand and non-negotiable for all areas that allow for future development.	<ul style="list-style-type: none"> The development contributions are not clearly specific as to what charges are for which service, where the money will be held and for the development of what. Even if the actual infrastructure is not put into place for the next 20 years the financial contributions should be taken so that when the time comes they are available for the works, thus reducing the burden for future generations.
263.10	Daytona Trust	General	Oppose	DELETE the Financial Contributions chapter and all associated objectives, policies, rules, and standards. 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. Submitter considers that the proposed Financial Contributions provisions do not meet Section 77 Resource Management Act and there is insufficient section 32 analysis for the scope of matters for which a financial contribution can be taken under the Proposed District Plan.
289.10	Tappenden Holdings Limited	General	Oppose	DELETE the Financial Contributions chapter from Part 2 - General District-Wide Matters - Strategic Direction and its associated objectives, policies, rules, and standards. 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. Submitter considers that the proposed Financial Contributions provisions do not meet Section 77 Resource Management Act and there is insufficient section 32 analysis for the scope of matters for which a financial contribution can be taken under the Proposed District Plan.
300.12	Bream Tail Residents Association Incorporated	General	Oppose	DELETE the Financial Contributions chapter and all associated objectives, policies, rules, and standards. 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. The submitter considers that the proposed Financial Contributions provisions do not meet Section 77 Resource Management Act and there is insufficient section 32 analysis for the scope of matters for which a financial contribution can be taken under the Proposed District Plan.