

## **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](mailto: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: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
136.100	Federated Farmers of New Zealand (Inc) - Northland Province	General		<b>ADD</b> a new objective and policy to support rule SUB-R5. <b>AND</b> Any consequential amendments.	<ul style="list-style-type: none"> <li>The submitter considers that the approach for SUB-R5 is not supported by an objective and policy structure (refer submission points 136.98 and 136.99).</li> </ul>
136.103	Federated Farmers of New Zealand (Inc) - Northland Province	General		<b>ADD</b> a clear objective and policy to support SUB-R6. <b>AND</b> Any consequential amendments.	<ul style="list-style-type: none"> <li>In principle, the submitter supports an enabling approach for subdivision that will create 'environmental benefit'. The rule is not supported by an objective and policy structure that leads to a controlled activity rule as being an appropriate resource management response in this zone. A clear policy framework is essential to provide clear direction to resource users and decision-makers (refer submission points 136.101 and 136.102).</li> </ul>
1.1	Arjan van Woensel	General	Amend	<b>AMEND</b> the Proposed District Plan to enable adequate electricity supply for subdivisions by either: <ul style="list-style-type: none"> <li>Connection to the existing electricity network; or</li> <li>Installation of a compliant renewable energy system designed to meet the ongoing energy needs of the dwelling(s) that meets guidelines or performance standards for reliability and suitability.</li> </ul>	<ul style="list-style-type: none"> <li>Submitter would like to see the plan enable "adequate electricity supply" for subdivisions which would be met by either:</li> <li>Connection to the existing electricity network; or</li> <li>Installation of a compliant renewable energy system designed to meet the ongoing energy needs of the dwelling(s) that meets guidelines or performance standards for reliability and suitability.</li> </ul>
50.21	Evolve Planning and Landscape Architecture	General	Amend	<b>AMEND</b> the Subdivision rules to include a rule for subdivisions within the Outstanding Natural Landscapes, Outstanding Natural Features and High Natural Character to provide protection for these features at the time of subdivision and ensure development is appropriate.	<ul style="list-style-type: none"> <li>The submitter opposes the wording of these rules as they are permissive and will result in poor development outcomes across the District within the General rural zone, Rural lifestyle zone and Outstanding Natural Landscape.</li> <li>When subdivisions are controlled there is no ability for a subdivision to be declined and the assessment criteria does not include any aspects related to the natural environment including ecology, landscape and the like.</li> <li>The environmental benefit type provision provides for the same number of lots as the general rule which provides no incentive to protect or restore any natural features.</li> <li>The title date reference provides no use and within the Operative Plan is not upheld.</li> <li>There is no provision to require the protection of Outstanding Natural Landscapes, Outstanding Natural Features or areas of Outstanding Natural Character at the time of subdivision which is contrary to Part II of the Resource Management Act and other high level national and regional planning documents.</li> </ul>
50.22	Evolve Planning and Landscape Architecture	General	Amend	<b>AMEND</b> the Subdivision chapter to include an integrated development type provision for subdivision similar to the rule in the Operative Plan.	<ul style="list-style-type: none"> <li>The submitter opposes the wording of these rules as they are permissive and will result in poor development outcomes across the District within the General rural zone, Rural lifestyle zone and Outstanding Natural Landscape.</li> <li>When subdivisions are controlled there is no ability for a subdivision to be declined and the assessment criteria does not include any aspects related to the natural environment including ecology, landscape and the like.</li> <li>The environmental benefit type provision provides for the same number of lots as the general rule which provides no incentive to protect or restore any natural features.</li> <li>The title date reference provides no use and within the Operative Plan is not upheld.</li> <li>There is no provision to require the protection of Outstanding Natural Landscapes, Outstanding Natural Features or areas of Outstanding Natural Character at the time of subdivision which is contrary to Part II of the Resource Management Act and other high level national and regional planning documents.</li> </ul>
92.7	Kim Bolton-Stewart	General	Amend	<b>AMEND</b> the Proposed District Plan to not allow more subdivision and dwellings on small, limited width access ways with poor access and which are unsafe for increase in number of vehicles and potential residents.	<ul style="list-style-type: none"> <li>Safety and amenity effects.</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
119.2	Amanda (Mandy) Harris	General	Amend	<b>AMEND</b> the Subdivision chapter to include stormwater management provisions.	<ul style="list-style-type: none"> <li>The submitter supports the inclusion of comprehensive urban stormwater planning provisions in the Proposed Kaipara District Plan 2025.</li> <li>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.</li> <li>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.</li> <li>These methods align with Te Mana o te Wai, reduce pollution, and enhance climate resilience.</li> <li>Without firm direction in the District Plan, Kaipara risks being reactive to changing government policy rather than proactive in protecting its unique environment.</li> <li>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.</li> <li>Without enforceable obligations, stormwater systems risk becoming reactive rather than preventive.</li> <li>Extreme weather and rising groundwater levels are already impacting infrastructure resilience: <ul style="list-style-type: none"> <li>Kaiwaka's wastewater treatment plant leaked into the Kaiwaka River following heavy rainfall in May 2025.</li> <li>Urban runoff from SH1 contributes heavy metals, hydrocarbons, and sediment to receiving waters.</li> <li>Flood-prone development and limited Council resourcing have resulted in unsafe footpaths, damaged properties, and insufficient drainage.</li> <li>Insurance risks are climbing, with some properties potentially becoming uninsurable.</li> </ul> </li> <li>Recent events underscore the urgent need for improved infrastructure: <ul style="list-style-type: none"> <li>The May 2025 overflow of the Kaiwaka Wastewater Treatment Plant led to a health warning for the Kaiwaka and Otamatea rivers and Kaipara Harbour.</li> <li>Urban development along SH1 has intensified runoff and pollutant loading.</li> <li>Two open gullies currently drain unfiltered stormwater directly into the Kaiwaka River.</li> <li>Many private properties have inadequate or unsafe stormwater systems, with limited Council capacity to enforce compliance.</li> </ul> </li> <li>Kaiwaka's topography offers natural opportunities for bioretention and green infrastructure. These should be leveraged to: <ul style="list-style-type: none"> <li>Reduce runoff velocity and volume.</li> <li>Filter contaminants before they reach the river.</li> <li>Mitigate future leakage from the wastewater plan.</li> </ul> </li> <li>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.</li> </ul>
125.8	Madara Vilde	General	Amend	<b>ADD</b> a new rule providing for subdivision rights in return for revegetation and ecological restoration, even where no existing significant vegetation exists, as alternative relief to amending Rule SUB-P6 to provide for these rights.  The restoration opportunities should include riparian buffers, wetlands and erosion-prone slopes.  See submission for further details.	<ul style="list-style-type: none"> <li>Rule SUB-R6 focuses on protecting existing ecological values through subdivision, but does not encourage restoration of degraded sites, such as riparian buffers, wetlands, erosion-prone slopes.</li> <li>The changes would support long-term ecological resilience and sustainability of the District.</li> <li>The changes would align with the National Policy Statement for Indigenous Biodiversity and Essential Freshwater Package.</li> <li>See submission for further details.</li> </ul>
144.5	Pacific Coast Surveys Ltd	General	Amend	<b>AMEND</b> SUB-O2 and SUB-O4 to be in accordance with Policies 3 and 5 of the National Policy Statement for Urban Development.	<ul style="list-style-type: none"> <li>Subdivision Objectives and Policies should align with National Policy Statement for Urban Development Policies 3 and 5.</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
144.6	Pacific Coast Surveys Ltd	General	Amend	<b>AMEND</b> SUB-P1, SUB-P4, and SUB-P6 to be in accordance with Policies 3 and 5 of the National Policy Statement for Urban Development.	<ul style="list-style-type: none"> <li>Subdivision objectives and policies should align with National Policy Statement for Urban Development Policies 3 and 5.</li> </ul>
149.75	Royal Forest and Bird Protection Society of New Zealand Incorporated	General	Amend	<p><b>ADD</b> new Subdivision objectives, policies and rules which cover subdivision within the Coastal Environment and where indigenous vegetation and habitats, riparian margins, and Outstanding Natural Features and Landscapes are present (inferred). New subdivision objectives should cover outcomes sought for subdivision within these areas or resulting in adverse effects on them.</p> <p>AND</p> <p><b>ADD</b> provisions that promote increasing indigenous vegetation cover in urban and non-urban environments.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> <li>As proposed, Subdivision provisions do not address subdivision within the Coastal Environment and where indigenous vegetation and habitats, riparian margins, and Outstanding Natural Features and Landscapes are present. New objectives should concern the outcomes sought for subdivision within such areas or where subdivision could result in adverse effects on them.</li> <li>The submitter considers that new provisions are required to recognise and provide for sections 6(1) (a-c) Resource Management Act and to give effect to the New Zealand Coastal Policy Statement, the National Policy Statement for Freshwater Management and the National Policy Statement for Indigenous Biodiversity.</li> <li>Moreover, new subdivision provisions should promote increasing indigenous vegetation cover in urban and non-urban environments, in accordance with National Policy Statement for Indigenous Biodiversity, Policy 14.</li> </ul>
177.6	Mangawhai Matters Inc	General	Amend	<p><b>AMEND</b> subdivision controls applying within the Mangawhai Estuary Catchment to be in accordance with the controls applying to The Rise/Cove Road precinct and Mangawhai Hills special purpose zone.</p> <p>OR</p> <p>Any further, alternative or consequential amendments.</p>	<ul style="list-style-type: none"> <li>Earthworks and site works provisions to protect the Mangawhai Estuary from the effects of land use and development, in particular sedimentation, have previously been incorporated into Private Plan Changes 83 and 84. These same provisions should apply to all land use activities within the Mangawhai Estuary catchment.</li> </ul>
200.3	Broughton Family Trust	General	Amend	<b>AMEND</b> the controlled activity for two-lot subdivision rules for "serviced" sites to treat cross-lease conversions that depend on on-site systems as un-serviced until reticulation is available.	<ul style="list-style-type: none"> <li>Cross-lease complexity and mixed servicing of the submitter's site.</li> <li>On-site wastewater capacity already stretched.</li> <li>Historic heritage on the site at risk.</li> <li>Loss of existing residential and papakāinga rights.</li> <li>Fragmented titles and unanimous-consent barrier under the site's cross lease requirements.</li> <li>Residential-scale infrastructure - upgrading infrastructure of these sites would impose disproportionate costs on existing owners.</li> <li>Council spatial-plan evidence of servicing constraints - The Maungatūroto Spatial Plan identifies the need for staged wastewater upgrades before further growth and rezoning.</li> </ul>
213.1	Blue Sky Land Company Ltd	General	Amend	<p><b>AMEND</b> all subdivision rules (including General rural zone) to refer to 'site' rather than 'allotments'.</p> <p>OR</p> <p>Alternative relief with similar effect.</p>	<ul style="list-style-type: none"> <li>The subdivision rules refer to both minimum 'allotment' area, and 'net site area' - both terms which have different meanings in accordance with the definitions section of the Proposed District Plan.</li> <li>The difference in terminology used within the rules causes confusion.</li> </ul>
213.6	Blue Sky Land Company Ltd	General	Amend	<p><b>AMEND</b> all subdivision standards (SUB-S1 to SUB-S16) to replace all references to "allotment" with "site".</p> <p>OR</p> <p>Alternative relief with similar effect.</p>	<ul style="list-style-type: none"> <li>The subdivision rules refer to both minimum 'allotment' area, and 'site' - both terms which have different meanings in accordance with the definitions section of the Proposed District Plan.</li> <li>The difference in terminology used within the rules causes confusion.</li> </ul>
216.62	Cabra Mangawhai Ltd & Pro Land Matters Ltd	General	Amend	<b>AMEND</b> the Subdivision provisions to state other positive outcomes such as environmental enhancement and biodiversity protection that may be achieved through urban and rural subdivision and land development.	<ul style="list-style-type: none"> <li>The submitter has requested the above resolution to ensure that the provisions of the subdivision chapter give effect to all relevant National Policy Statements (NPS IB, NPS FW, and NPS UD).</li> </ul>
216.63	Cabra Mangawhai Ltd & Pro Land Matters Ltd	General	Amend	<b>AMEND</b> the Proposed District Plan provisions, including the subdivision rules which relate to the Managed Growth Area to provide more directive guidance.	<ul style="list-style-type: none"> <li>The submitter has requested the above resolution to provide for managed growth, as currently growth restrictions are applied.</li> </ul>
222.41	Kaipara District Council	General	Amend	<p><b>ADD</b> a point to the matters of control/discretion for all relevant subdivision rules as follows:</p> <p><u>XX. Financial contributions in accordance with the Financial Contributions chapter.</u></p>	<ul style="list-style-type: none"> <li>As notified, the subdivision rules are not clear that financial contributions are a consideration in every case.</li> </ul>

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222.52	Kaipara District Council	General	Amend	<b>AMEND</b> subdivision rules and standards to include overland flow paths.	<ul style="list-style-type: none"> <li>There is no mention in the Subdivision chapter in either rules or matters of control or discretion for consideration of overland flow paths.</li> </ul>
231.33	S Cullen	General	Amend	<b>AMEND</b> the subdivision policies to include clear direction for subdivision of industrial land. <b>AND</b> Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>The Proposed District Plan does not provide any policy direction on subdivision of industrial land other than appropriate servicing provisions within the respective zone chapters leaving little direction on the anticipated direction for non-complying subdivisions of industrial land.</li> </ul>
237.10	K P Dreadon Limited	General	Amend	<b>ADD</b> new SUB-S16A Lot Yield Formula for Environmental Benefit Subdivision. One lot per 0.5ha protected indigenous vegetation or 0.5ha protected wetland. No maximum cap-yield is proportionate to ecological contribution. Subject to SUB-S17-S20 compliance.	<ul style="list-style-type: none"> <li>New yield table essential for providing clear, quantifiable incentives for ecological enhancement with transparent ratios reflecting existing standards while incentivising larger-scale restoration.</li> </ul>
237.11	K P Dreadon Limited	General	Amend	<b>ADD</b> new SUB-S17 Donor Site Eligibility. Requiring minimum 0.5ha indigenous vegetation or 0.5ha wetland, Suitably Qualified or Experienced Person assessment, perpetual legal protection via covenant, approved management plan, and implementation before lot transfer.	<ul style="list-style-type: none"> <li>New standard essential for establishing clear donor site eligibility criteria ensuring ecological quality and professional assessment standards.</li> </ul>
237.12	K P Dreadon Limited	General	Amend	<b>ADD</b> new SUB-S18 Receiving Site Eligibility. Must be within Offset Receiving Zone, outside sensitive overlays, equal or lesser productive soil value than donor, and comply with access/servicing requirements.	<ul style="list-style-type: none"> <li>New standard essential for ensuring receiver sites are appropriate and do not conflict with soil protection or environmental overlays.</li> </ul>
237.13	K P Dreadon Limited	General	Amend	<b>ADD</b> new SUB-S19 Lot Yield Controls. One lot per 0.5ha qualifying indigenous vegetation or 0.5ha wetland. No cap on yield-scales with total ecological area.	<ul style="list-style-type: none"> <li>New standard providing clear yield controls essential for market certainty while preventing over-intensification through maximum caps</li> </ul>
237.14	K P Dreadon Limited	General	Amend	<b>AMEND</b> SUB-S20 to require a certified Offset Management Plan (Schedule X) as a precondition for any transferable development rights certificate being issued, and include requirements for consent notices and covenants to secure the environmental feature.	<ul style="list-style-type: none"> <li>This rule underpins the legal framework for issuing transferable development rights certificates but needs to be linked directly to the Offset Management Plan requirements.</li> </ul>
237.5	K P Dreadon Limited	General	Amend	<b>ADD</b> new SUB-R8 Controlled Activity - Internal Transfers within Offset Receiving Zone. This would be applicable where donor and receiver sites are both in an Offset Receiving Zone, donor meets SUB-S17, receiver meets SUB-S18, yield complies with SUB-S19, and all SUB-S20 mechanisms secured.	<ul style="list-style-type: none"> <li>This new rule provides a clear, controlled pathway for implementing the TDR mechanism where both donor and receiver sites are within an Offset Receiving Zone essential for operational certainty.</li> </ul>
237.6	K P Dreadon Limited	General	Amend	<b>ADD</b> new SUB-R9 Restricted Discretionary - Transfers between Offset Receiving Zones or Exceptional Benefit. This would be applicable where donor/receiver in different Offset Receiving Zones or receiver outside Offset Receiving Zones with superior ecological/planning outcome demonstrated.	<ul style="list-style-type: none"> <li>This rule provides necessary flexibility for exceptional circumstances while maintaining clear evaluation framework for cross Offset Receiving Zone transfers</li> </ul>
237.7	K P Dreadon Limited	General	Amend	<b>ADD</b> new SUB-R10 Non-Complying - Transfers into Sensitive Overlays. This would be applicable where receiver site is within Outstanding Natural Landscapes, Significant Natural Areas, High-Class Soil, or Coastal Protection, or where SUB-S17 to SUB-S20 standards are not met.	<ul style="list-style-type: none"> <li>Essential protection rule ensuring most sensitive locations remain protected from inappropriate subdivision transfers while allowing limited discretion under exceptional cases.</li> </ul>
237.8	K P Dreadon Limited	General	Amend	<b>ADD</b> SUB-R11 as a Controlled Activity rule that enables subdivision via transferable development rights in an Offset Receiving Zone, provided SUB-S17- S20 criteria are met and a transfer certificate has been issued by Council.	<ul style="list-style-type: none"> <li>This rule provides a clear controlled pathway for implementing the transferable development rights mechanism where the receiver site is within an Offset Receiving Zone. This improves operational certainty for both applicants and the Council.</li> </ul>
238.3	L & R Guy	General	Amend	No specific decision requested, however the submission considers that the 600m <sup>2</sup> lots proposed for Baylys Beach is very small and that many lots would impact runoff going down towards the beach. The septic tank system would have to be addressed.	<ul style="list-style-type: none"> <li>Concerns about the extent of the residential area proposed for Baylys Beach.</li> </ul>
248.30	Journeys End Limited	General	Amend	<b>ADD</b> a new rule providing for environmental benefit subdivision in the General rural zone as a restricted discretionary activity to the Proposed Far North District Plan. <b>AND</b> Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>Inclusion of such a rule will result in improved consistency in terms of regional approach to biodiversity protection (as both FNDC and WDC plans include environmental benefit rules), as well as cross boundary with Auckland Council and accordance with the RPS and NPS-IB.</li> </ul>
248.7	Journeys End Limited	General	Amend	<b>AMEND</b> the Subdivision chapter to enable environmental benefit subdivision for protecting, enhancing and restoring indigenous biodiversity where any rural production value is not compromised. <b>AND</b>	<ul style="list-style-type: none"> <li>There is no incentivisation offered for protection, enhancement or restoration of indigenous biodiversity which is a step backwards from the ODP and inconsistent with neighbouring councils.</li> </ul>

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				Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>The amendment will improve alignment with the National Policy Statement for Indigenous Biodiversity 2023.</li> </ul>
249.1	Khans Developments and Investments Limited	General	Amend	<b>AMEND</b> all Subdivision rules (including General rural zone) to refer to 'site' rather than 'allotments'. OR Alternative relief with similar effect.	<ul style="list-style-type: none"> <li>The subdivision rules refer to both minimum 'allotment' area, and 'net site area' - both terms which have different meanings in accordance with the definitions section of the Proposed District Plan.</li> <li>The difference in terminology used within the rules causes confusion.</li> </ul>
249.6	Khans Developments and Investments Limited	General	Amend	<b>AMEND</b> all subdivision standards (SUB-S1 to SUB-S16) to replace all references to 'allotment' with 'site'. OR Alternative relief with similar effect.	<ul style="list-style-type: none"> <li>The subdivision rules refer to both minimum 'allotment' area, and 'site' - both terms which have different meanings in accordance with the definitions section of the Proposed District Plan.</li> <li>The difference in terminology used within the rules causes confusion.</li> </ul>
255.7	P McDermott	General	Amend	<b>ADD</b> rules to support submitter's requested additional clause to SUB-P3. Submitter suggests rules for: <ul style="list-style-type: none"> <li>Residential other bonuses to the General residential zone;</li> <li>Credit against open space and recreational requirements.</li> <li>Credit against financial contributions (for providing a soft engineering benefit as hazard management investment).</li> </ul>	<ul style="list-style-type: none"> <li>To better manage the risk of natural hazards, particularly flooding.</li> </ul>
269.30	Health New Zealand - Te Whatu Ora	General	Amend	<b>AMEND</b> the subdivision rules to address subdivision for regionally significant infrastructure in the Hospital zone. AND Any necessary proposed/alternative/consequential relief to address matters raised in this submission.	<ul style="list-style-type: none"> <li>The subdivision rule set is incomplete and conflicting.</li> <li>The Council's s32 identifies protection and enablement of regionally significant infrastructure and in the case of Dargaville Hospital, establishing a Hospital zone. The s32 also identifies discouragement of subdivision where it could undermine regionally significant infrastructure.</li> <li>As identified above in relation to the subdivision overview and policy framework – the subdivision provisions do not recognise that subdivision is not only related to infrastructure demand but also supply.</li> <li>As drafted the provisions only provide for controlled activity subdivision in the Hospital zone in relation to boundary adjustments (SUB-R1) and alteration of cross leases or conversion of tenure (SUB-R2). Confusingly controlled activity rule SUB-R3 (for new allotments) does not apply in the Hospital zone but also includes a condition “this rule does not apply to the Special purpose zones”. There is no other subdivision rule applying to the Hospital zone.</li> <li>The submitter opposes the gap in subdivision provisions in relation to the Hospital zone and seeks relief in the form of an amendment to the subdivision rules to address this. The submitter would be willing to work with Council officers to jointly draft provisions particular to the Hospital zone (and that amongst other things address the matters raised earlier in this submission in relation to subdivision also enabling infrastructure).</li> </ul>
281.9	Moonlight Heights Limited	General	Amend	<b>ADD</b> an exemption in the Overview of the Subdivision chapter for Precincts similar to that in the Transport chapter. AND Any further necessary consequential amendments required.	<ul style="list-style-type: none"> <li>The submitter has requested the above amendment as a precinct exemption clause provide clarity for plan users.</li> </ul>
283.164	Northpower Limited and Northpower Fibre Limited	General	Amend	<b>AMEND</b> the Subdivision chapter to ensure that electricity and telecommunications infrastructure is adequately provided for at the time of subdivision and reverse sensitivity effects on existing infrastructure are avoided. AND Any further necessary consequential amendments required.	<ul style="list-style-type: none"> <li>To ensure that adequate provision for electricity and telecommunications infrastructure is provided at the time of subdivision to ensure planned and coordinated development, and that existing infrastructure is protected from inappropriate development and future land use.</li> </ul>
283.168	Northpower Limited and Northpower Fibre Limited	General	Amend	<b>ADD</b> a new policy to the Subdivision chapter as follows (or to a similar effect): “SUB-PX <u>Ensure that subdivision and future land uses do not generate reverse sensitivity effects on the electricity and telecommunications infrastructure network by:</u>	<ul style="list-style-type: none"> <li>To direct the protection of critical electricity lines and critical fibre optic cables from reverse sensitivity effects generated by inappropriate subdivision and future land use to achieve alignment with Policy 5.1.1 of the Regional Policy Statement.</li> </ul>



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				<p>1. <u>Ensuring suitable setbacks are achieved at the time of subdivision from all electricity and telecommunications infrastructure; and</u></p> <p>2. <u>Requiring setbacks at the time of subdivision from mapped Critical Electricity Lines and Critical Fibre Optic Cables."</u></p> <p>AND</p> <p>Any further necessary consequential amendments required.</p>	
283.170	Northpower Limited and Northpower Fibre Limited	General	Amend	<p><b>ADD</b> a new standard to the Subdivision chapter which requires any proposed building platform to be located at least 20m from the centreline of a Critical Electricity Line or Critical Fibre Optic Cable. Any non-compliance with this standard is to result in a Discretionary activity status.</p> <p>AND</p> <p>Any further necessary consequential amendments required.</p>	<ul style="list-style-type: none"> <li>Northpower seeks the same protection provided by SUB-S9 and SUB-S10 be provided for electricity distribution and telecommunications networks at subdivision stage to avoid the electricity network being compromised by future built development.</li> </ul>
292.69	Transpower New Zealand Limited	General	Amend	<p><b>AMEND</b> the last paragraph of the Overview of the Subdivision chapter as follows:</p> <p>The subdivision chapter contains the <u>main primary</u> objectives, policies and rules for subdivision. <u>The rules for subdivision within the National Grid Subdivision Corridor are located in the infrastructure chapter.</u> The objectives and policies in the infrastructure, transport and public access chapters are also relevant to subdivision. Where subdivision occurs on land subject to a District Plan overlay, the objectives and policies in the overlay chapter are also applicable.</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"> <li>Subdivision within the National Grid Subdivision Corridor is controlled by INF-R52, however the last paragraph of the overview to the Subdivision chapter of the Proposed District Plan provides no indication of this. This will provide clarity for Plan users.</li> </ul>
300.34	Bream Tail Residents Association Incorporated	General	Amend	<p><b>ADD</b> a new policy which applies to the following properties:</p> <ol style="list-style-type: none"> <li>54 Mangawhai Heads Road, Mangawhai (LOT 4 DP 310358).</li> <li>47 Cullen Street, Mangawhai (LOT 100 DP 572492).</li> <li>55 Cullen Street, Mangawhai (LOT 9 DP 191042).</li> </ol> <p>The new policy should include appropriate direction to properly have regard to and give effect to the Resource Management Act 1991, and higher order policy documents including the Regional Policy Statement and include the following:</p> <ol style="list-style-type: none"> <li>Protection of indigenous biodiversity of the surrounding locality, including prohibitions within the Precinct on dogs, cats and mustelids.</li> <li>Avoidance of reverse sensitivity effects on adjoining and nearby primary production activities in rural zones and precincts.</li> <li>Maintenance and enhancement of rural character, landscape values and amenity values, in recognition that the land provides a transition from urban to rural land uses.</li> <li>Provision of a sensitive transition to the Rural zone (including Bream Tail to the north), recognising the rural landscape values, including by the provision of lower residential densities, setbacks and landscape buffers and screening.</li> <li>Adherence of future subdivision to a new appropriate Spatial Layer that ensures the above outcomes are met.</li> </ol> <p>AND</p> <p><b>ADD</b> a new appropriate Spatial Layer to these properties on the planning maps.</p> <p>OR</p> <p>If the above relief is not accepted, rezone the properties from General residential zone to General rural zone.</p> <p>AND</p> <p>Any consequential amendments or alternative relief to address the matters raised in the submission.</p>	<ul style="list-style-type: none"> <li>Refer to submission for detailed reasoning. Reasons summarised as follows:</li> <li>The Proposed District Plan only applies general subdivision policies in the Subdivision chapter in relation to the subdivision of properties 54 Mangawhai Heads Road, Mangawhai (LOT 4 DP 310358), 47 Cullen Street, Mangawhai (LOT 100 DP 572492), and 55 Cullen Street, Mangawhai (LOT 9 DP 191042) adjoining and in proximity to the southern boundary of Bream Tail. These properties are at the boundary of urban and rural and the Proposed District Plan does not provide direction on how this transition is to be managed.</li> <li>Subdivision of these properties would risk reverse sensitivity effects on Bream Tail and the proposed zoning does not provide a suitable rural to urban transition.</li> <li>Overall submission seeks an extensive new set of provisions is introduced into the Proposed District Plan in relation to these properties.</li> <li>The subdivision provisions do not meet the requirements of the Resource Management Act 1991 and the directives of the Northland Regional Policy Statement policies under section 5.1.</li> <li>Failing the outcomes sought, the submission seeks that the properties be rezoned General Rural.</li> </ul>
301.16	Channel Terminal Services Limited	General	Amend	<p><b>ADD</b> cross-reference to INF-R57 within the Subdivision chapter.</p> <p>AND</p>	<ul style="list-style-type: none"> <li>Cross-references will ensure that plan-users are aware of these rules relating to the Gas or Petroleum Pipeline Corridor especially in regard to the lack of</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				Any ancillary, or alternative and consequential relief as necessary or appropriate.	comprehensive management of reverse sensitivity issues that arise between adjacent zones.
304.96	Director General of Conservation	General	Amend	<p><b>ADD</b> a new objective to the Subdivision chapter as follows:  <u>Protection and Enhancement of Kaipara's Valued Features and Environments</u>            Subdivision provides for the protection and enhancement of the District's:</p> <ol style="list-style-type: none"> <li><u>Outstanding Natural Features.</u></li> <li><u>Outstanding Natural Landscapes</u></li> <li><u>Coastal Environment</u></li> <li><u>Areas of High Natural Character</u></li> <li><u>Outstanding Natural Character</u></li> <li><u>Significant Indigenous vegetation and significant habitats of indigenous fauna.</u></li> </ol> <p>AND            Any further or alternative relief to like effect to that sought.</p>	<ul style="list-style-type: none"> <li>The submitter requests a new Subdivision objective to ensure subdivision provides for the protection and enhancement of Kaipara District's natural features (as listed in the proposed objective).</li> </ul>
304.97	Director General of Conservation	General	Amend	<p><b>ADD</b> a new objective to the Subdivision chapter as follows:  <u>Managing Adverse Effects:</u>            Subdivision is designed and occurs in a manner to avoid, remedy or mitigate adverse effects on the environment.</p> <p>AND            Any further or alternative relief to like effect to that sought.</p>	<ul style="list-style-type: none"> <li>The submitter considers an objective to manage adverse effects associated with subdivision is required.</li> </ul>
309.74	Clarus	General	Amend	<p><b>RETAIN</b> the Subdivision chapter policies.</p> <p>AND  <b>ADD</b> a new policy to the Subdivision chapter as follows:  <u>SUB-PX</u>            Manage the subdivision of land within the National Grid Corridor or Gas or Petroleum Transmission Pipeline Corridor to avoid significant adverse effects on the operation of this infrastructure and on sensitive activities locating near to it, including control of the location of building platforms and protecting access to the infrastructure for operation and maintenance.</p> <p>OR  <b>ADD</b> the above text to an existing policy.</p> <p>AND            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"> <li>The policies are supported overall. There is no policy which supports the need to manage subdivision in the gas transmission pipeline corridor or the National Grid yard. This would support the relevant standards S9 and S10.</li> </ul>
310.32	Fonterra Limited	General	Amend	<p><b>ADD</b> new standard to the Subdivision chapter specifically for subdivision of land within the Maungatūroto Dairy Factory Noise Sensitive Area, as follows:  <u>SUB-S17 Subdivision of land within the Maungatūroto Dairy Factory Noise Sensitive Area</u>  <b>All zones</b></p> <ol style="list-style-type: none"> <li>Where subdivision of land is proposed within the Maungatūroto Dairy Factory Noise Sensitive Area, any proposed building platform must be located entirely outside of the Maungatūroto Dairy Factory Noise Sensitive Area.</li> <li>Activity status when compliance not achieved: Discretionary.</li> </ol> <p><b>Note:</b>            If a resource consent application is made under this standard, the owner and operator of the Maungatūroto Dairy Factory will be considered an affected person in accordance with section 95E of the Act and notified of the application, where written approval is not provided.</p>	<ul style="list-style-type: none"> <li>Refer to submission for detailed reasoning. It is critical to properly manage the relationship between new residential development near the Maungatūroto Site to ensure the facility is not compromised by increasing residential density resulting in reverse sensitivity effects. As there are no subdivision rules or standards within the Proposed District Plan that protect the Maungatūroto Site from potential reverse sensitivity effects, Fonterra seeks a new subdivision standard that triggers a discretionary activity consent for subdivision of land within the Maungatūroto Dairy Factory Noise Sensitive Area.</li> </ul>
310.33	Fonterra Limited	General	Amend	<p><b>ADD</b> a new standard to the Subdivision chapter for subdivision of land within the Maungatūroto Dairy Factory wastewater pipeline corridor, as follows:  <u>SUBS-SX Subdivision of land within the Maungatūroto Dairy Factory wastewater pipeline corridor</u>  <b>All Zones</b></p> <ol style="list-style-type: none"> <li>Any proposed building platform must be located entirely outside of the Maungatūroto Dairy Factory wastewater pipeline corridor.</li> </ol>	<ul style="list-style-type: none"> <li>Refer to submission for detailed reasoning.</li> <li>The submitter seeks a subdivision standard to avoid potential reverse sensitivity effects and protect the structural integrity of the Maungatūroto Site wastewater pipeline. In order to effectively implement the proposed new subdivision standard, the submitter is also seeking that the planning maps show a 40m "Maungatūroto Dairy Factory wastewater pipeline corridor" (i.e. 20m either side of the pipeline) as per their submission.</li> </ul>



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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<p>2. <b>Activity status when compliance is not achieved:</b> <u>Restricted Discretionary</u></p> <p>3. <b>Matters over which discretion is restricted:</b></p> <ol style="list-style-type: none"> <li><u>The subdivision layout and design in regard to how this may impact on the operation, maintenance, upgrading and development of, including access to, the wastewater pipeline;</u></li> <li><u>The risk to public or individual safety, or property damage;</u></li> <li><u>The nature and location of any earthworks and how such earthworks will impact on the operation, maintenance, upgrade and development (including access) of the wastewater pipeline;</u></li> <li><u>The risk to the structural integrity of the wastewater pipeline;</u></li> <li><u>The extent to which the subdivision design and consequential development will minimise the potential reverse sensitivity effects on the wastewater pipeline.</u></li> <li><u>The outcome of any consultation with the owner and operator of the wastewater pipeline.</u></li> </ol> <p><b>Notification</b>  <u>If a resource consent application is made under this standard, the owner and operator of the wastewater pipeline will be considered an affected person in accordance with section 95E of the Act and notified of the application, where written approval is not provided.</u></p>	
315.46	Horizon Surveying & Land Development	General	Amend	<b>ADD</b> assessment criteria to the controlled activity subdivision rules that require evaluation of effects on rural character and amenity.	<ul style="list-style-type: none"> <li>There is a lack of assessment criteria when requiring consideration of the effects of a subdivision on rural character and amenity.</li> </ul>
315.54	Horizon Surveying & Land Development	General	Amend	<b>ADD</b> the integrated development provisions as a subdivision pathway into the Proposed District Plan.	<ul style="list-style-type: none"> <li>The integrated development provisions previously provided for well-designed outcomes balancing rural productivity, environmental benefit, and growth.</li> </ul>
315.55	Horizon Surveying & Land Development	General	Amend	<b>ADD</b> transferable subdivision/development rights into the Proposed District Plan, particularly within the Rural lifestyle zone, similar to the Auckland Unitary Plan approach.	<ul style="list-style-type: none"> <li>Transferable Development Rights (TDRs) could enable managed growth while protecting ecological and productive rural land.</li> <li>TDRs offer flexibility and are successfully used in other plans.</li> </ul>
332.49	Northland Regional Council	General	Amend	<b>ADD</b> a new Subdivision policy to reflect the Regional Policy Statement direction on no net loss of biodiversity and to support the implementation of the discretionary or restricted discretionary activity status sought by the submitter for SUB-R4.	<ul style="list-style-type: none"> <li>The submitter seeks that a new Subdivision policy is added to support the implementation of the discretionary or restricted discretionary activity status sought for SUB-R4, as well as ensuring the matters raised in submission point 332.48 can be appropriately considered at the time of subdivision.</li> <li>Refer to submission point on SUB-R4 for further details.</li> </ul>
332.50	Northland Regional Council	General	Amend	<p><b>DELETE</b> reference to site specific assessments of highly productive land from the subdivision rules.</p> <p>AND</p> <p><b>DELETE</b> reference to site specific assessments of highly productive land from other rules where it is mentioned.</p>	<ul style="list-style-type: none"> <li>SUB-R3.1.b. enables subdivision in the General rural zone not containing land defined as Highly Productive Land (HPL) to occur as a controlled activity. However, the same clause also refers to the ability to discount HPL based on site-specific assessment.</li> <li>The submitter notes HPL is defined under the National Policy Statement on Highly Productive Land and the definition does not provide for a site-specific assessment to discount whether land is HPL. It is therefore requested that reference to site specific assessments is removed from SUB-R3 and the other rules where it is included.</li> </ul>
333.2	NZ Fairy Tern Trust	General	Amend	<p><b>ADD</b> a new standard to the Subdivision chapter to consider any possible adverse effects on night flying avian fauna in accordance with submission point 333.1.</p> <p>OR</p> <p><b>AMEND</b> SUB-S7 to include requirements to consider any possible adverse effects on night flying avian fauna in accordance with submission point 333.1.</p>	<ul style="list-style-type: none"> <li>The submitter has requested the above relief to provide provisions to protect night flying avian fauna from disorientation and endanger.</li> </ul>
334.1	Native Forest Restoration Trust	General	Amend	<b>ADD</b> to SUB-R6 and SUB-S16 the ability to transfer Environmental Benefit Allotments where the subject land is not capable of absorbing further development, or the natural values on that land are of such significance as to render it an inappropriate location for subdivision.	<ul style="list-style-type: none"> <li>The submitter has requested the above amendments for the following reasons:</li> <li>Proposed rules SUB-R6, SUB-R7 and SUB-16 require the new 'Environmental Benefit Subdivision Allotments' to be located on the same site where the</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<p>AND</p> <p><b>AMEND</b> objectives, policies, rules and the subdivision chapter as required to implement the above provision.</p>	<p>protection/restoration work has been undertaken, despite clause 18.7.1 bullet point 4 in the Operative Kaipara District Plan which provides for the Council to 'undertake further investigation and investigate a plan change relating to transferrable development rights, to provide for Environmental Benefit and Preservation of Natural and Cultural Heritage subdivision...'</p> <ul style="list-style-type: none"> <li>• Environmental Benefit Allotments could provide an option for rural lifestyle development as envisaged by the Proposed District Plan.</li> <li>• The only way the submitter could benefit from the 'Environmental Provisions' of the Proposed District Plan is if the Environmental Benefit Allotments could be transferred to another property in the General rural zone, or to subdivisions within the Rural lifestyle zone.</li> </ul>
334.6	Native Forest Restoration Trust	General	Amend	<p><b>ADD</b> a separate rule to enable Environmental Subdivision earned on a site in the General rural zone to be transferred to a site elsewhere in the General rural zone.</p> <p>OR</p> <p><b>AMEND</b> Part 2 District-wide matters, SUB-R6, SUB-R7, and SUB-S16 to enable Environmental Subdivision earned on a site in the General rural zone to be transferred to a site elsewhere in the General rural zone.</p> <p>AND</p> <p><b>AMEND</b> objectives, policies and rules as appropriate in order to implement the above provision.</p>	<ul style="list-style-type: none"> <li>• The submitter has requested the above relief for the following reasons:</li> <li>• An environmental benefit allotment could be readily absorbed into a General rural site (excluding highly productive land) as the minimum Lot size in the General rural zone is 12 ha, and the minimum site area for a new environmental allotment is 4,000m<sup>2</sup>.</li> </ul>
334.7	Native Forest Restoration Trust	General	Amend	<p><b>ADD</b> a separate rule to enable Environmental Subdivision Allotments earned on a site in the General rural zone to be transferred to a site in the Rural lifestyle zone.</p> <p>OR</p> <p><b>AMEND</b> Part 2 District-wide matters, SUB-R6, SUB-R7, and SUB-S16 to enable Environmental Subdivision Allotments earned on a site in the General rural zone to be transferred to a site in the Rural lifestyle zone.</p> <p>AND</p> <p><b>AMEND</b> SUB-S16 to reduce the minimum site size of Environmental Benefit Subdivision to be transferred from the General rural zone into the Rural lifestyle zone from 4,000m<sup>2</sup> to 2,000m<sup>2</sup>, subject to such further conditions (as Council believes necessary to ensure that the function and desired outcomes for the Rural lifestyle zone are not undermined).</p> <p>OR</p> <p><b>AMEND</b> SUB-S1.7 to be amended to read: "Allotments must have a minimum net site area of 4,000 8,000m<sup>2</sup> which could be reduced to 4,000m<sup>2</sup> by the transfer of Environmental Benefits from the General rural zone."</p> <p>AND</p> <p><b>AMEND</b> objectives, policies and rules as appropriate in order to implement the above provision.</p>	<ul style="list-style-type: none"> <li>• The submitter has requested the above relief for the following reasons:</li> <li>• Rural lifestyle zone is most suitable for rural lifestyle development.</li> <li>• Environmental Benefit Allotments within most of the Rural lifestyle zone is 4,000m<sup>2</sup>, which means Rural Lifestyle Properties under the current subdivision standards are unable to absorb an Environmental Benefit Allotment, also of 4,000m<sup>2</sup>.</li> <li>• Decreasing the minimum lot size of the environmental benefit subdivision to be transferred to the rural lifestyle zone to 2,000m<sup>2</sup> will ensure the function and desired outcomes for the Rural lifestyle zone are not undermined and will provide further protection incentives.</li> <li>• Increasing the normal minimum Lot area within the 8,000m<sup>2</sup> will ensure that Environmental Benefit Subdivision Lots are absorbed into the most appropriate locations and would serve to provide a strong marked within the Rural lifestyle zone for purchase of transferred Environmental Benefit Allotments.</li> </ul>
349.6	WS & R Smellie and McConaughy Family Trusts	General	Amend	<p><b>AMEND</b> the Subdivision rules and standards to provide for greater flexibility for residential development on large sites which do not currently support residential development on large sites.</p> <p>AND</p> <p><b>AMEND</b> any other rules and standards that do not support residential development on large sites.</p>	<ul style="list-style-type: none"> <li>• Submitter notes that 'site' is defined in the Proposed District Plan to comprise land on a single record of title. The submitter has several existing titles of over 25ha and although they have no immediate plans to subdivide they may contemplate providing for their extended family by developing several residences on one site (title).</li> <li>• The Rural lifestyle zone is intended to be characterised by low residential development with limited buildings and structures but the objectives and rules in the Proposed District Plan seems to disadvantage people wanting to develop within existing large sites. This would preclude developments for extended families and seems perverse as development on large sites would be at a lower density than anticipated in the Proposed District Plan and result in less cumulative adverse effects on natural and other values.</li> </ul>
349.7	WS & R Smellie and McConaughy Family Trusts	General	Amend	<p><b>AMEND</b> the Subdivision standards to provide for greater flexibility for residential development on large sites which do not currently support residential development on large sites.</p> <p>AND</p>	<ul style="list-style-type: none"> <li>• Submitter notes that 'site' is defined in the Proposed District Plan to comprise land on a single record of title. The submitter has several existing titles of over 25ha and although they have no immediate plans to subdivide they may contemplate providing for their</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<b>AMEND</b> any other rules and standards that do not support residential development on large sites.	<p>extended family by developing several residences on one site (title).</p> <ul style="list-style-type: none"> <li>The Rural lifestyle zone is intended to be characterised by low residential development with limited buildings and structures but the objectives and rules in the Proposed District Plan seems to disadvantage people wanting to develop within existing large sites. This would preclude developments for extended families and seems perverse as development on large sites would be at a lower density than anticipated in the Proposed District Plan and result in less cumulative adverse effects on natural and other values.</li> </ul>
350.1	C Matchett	General	Amend	<b>AMEND</b> the subdivision provisions for Historic Heritage sites/buildings so that the submitter's site at 621 Tara Road, Mangawhai (Lot 1 DP 470898) containing two historic buildings (HH-MAN-01) can be subdivided (inferred). Submitter notes that they intend to keep the historic buildings on one title/not subdivided but wants to be able to subdivide off the balance of the parcel as a permitted activity (refer to attached submission for aerial plan of the site).	<ul style="list-style-type: none"> <li>The requirement to include the almost five hectares of land parcel with the two historic buildings to be unsubdivided off appears excessive and manifestly unjust.</li> <li>Submitter's intention is to be able to subdivide two hectares from the parcel, which was previously a permitted activity and considers that this will not affect the historic status of the buildings.</li> <li>Without the submitter's request being granted, the extensive restoration required to the historic buildings will not be able to proceed for financial reasons, leaving the building to become a historic ruin.</li> </ul>
362.5	Bruce Nelder of B & C Family Trust and Nelder Farms Ltd	General	Amend	<b>ADD</b> the integrated development rule from the Operative District Plan back into the Proposed District Plan as a subdivision pathway.	<ul style="list-style-type: none"> <li>The Proposed District Plan removes the integrated development provisions that previously provided for well-designed outcomes balancing rural productivity, environmental benefit, and growth.</li> </ul>
50.14	Evolve Planning and Landscape Architecture	General	Oppose	<b>ADD</b> objectives and policies to the Subdivision chapter to protect: <ol style="list-style-type: none"> <li>Character (rural, rural lifestyle, residential);</li> <li>Amenity values (in line with the definition of the Resource Management Act); and</li> <li>Ecological values and natural features.</li> </ol>	<ul style="list-style-type: none"> <li>Submitter opposes the wording of the objective and policy framework because they are light on protecting rural character and amenity values at the time of subdivision as well as ecological and natural features.</li> </ul>
67.5	Adam Booth	General	Oppose	<b>DELETE</b> the reference to the Mangawhai/Hakaru Managed Growth Area from the Proposed District Plan entirely OR <b>AMEND</b> the activity status for subdivision in SUB-R4 for the Mangawhai/Hakaru Managed Growth Area to be restricted discretionary.	<ul style="list-style-type: none"> <li>Submitter considers that the creation of the Mangawhai/Hakaru Managed Growth Area is short sighted.</li> <li>It is the market that will decide where people want to live.</li> <li>Hampering development through this rule will not generate any development contributions, and thereby Council will not have the funds to undertake any future infrastructure upgrades.</li> <li>The current scenario will result in stymieing growth in the district, driving up property prices as the wealthy move into the area, resulting in increasing rates and rental costs in the area.</li> <li>The amendment to a restricted discretionary status is a significant change from discretionary, but will still allow the council the ability to push back on developments that are not adequately serviced, and are not within areas that are planned for infrastructure upgrades.</li> </ul>
92.1	Kim Bolton-Stewart	General	Oppose	<b>AMEND</b> the Proposed District Plan to prevent an increase in the number of dwellings on the access way for 956 Oneriri Road, Kaiwaka.	<ul style="list-style-type: none"> <li>The submitter has requested this relief for the following reasons:</li> <li>Any further subdivision and further development on the submitters shared accessway is undesirable,</li> <li>Further subdivision and development would hinder lifestyle quality and lower valuations,</li> <li>The access to the site (and others on the shared access) is unsafe for an increase in vehicles and residents,</li> <li>Further subdivision and development will affect the submitters BNB business,</li> <li>Additional development will adversely affect the ecology of the Kaipara Harbour.</li> </ul>
110.1	Astute Consulting	General	Oppose	<b>DELETE</b> SUB-P12 Subdivision in the Mangawhai/Hakaru Managed Growth Area. AND	<ul style="list-style-type: none"> <li>The Mangawhai/Hakaru Managed Growth Area is inappropriate in terms of the Resource Management Act, and inconsistent with National Planning Standards. The submission opposes such a hard</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<b>DELETE</b> all the subdivision rules relating to the Mangawhai/Hakaru Managed Growth Area. AND <b>AMEND</b> the subdivision rules applicable to the rest of the District to apply to the Mangawhai/Hakaru Managed Growth area.	restriction on subdivision in the area of the District subject to the greatest growth and demand.
126.10	Loralie Sheppard	General	Oppose	<b>AMEND</b> the subdivision restrictions on the Mangawhai/Hakaru Managed Growth Area. A possible solution to these restrictions is to use Rural lifestyle zone in this area. See submission #128 by same submitter for further details.	<ul style="list-style-type: none"> <li>No specific reason stated. See submission #128 by same submitter for further details.</li> </ul>
149.76	Royal Forest and Bird Protection Society of New Zealand Incorporated	General	Oppose	<b>ADD</b> rules and standards to ensure subdivision is appropriately managed in areas that require preservation and protection under s6Resource Management Act. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> <li>The submitter notes that, for the most part, subdivision is enabled across all zones. However, subdivision rules and standards do not manage subdivision in areas requiring protection (e.g., Outstanding Natural Features, Outstanding Natural Landscapes and/or the Coastal Environment). It is requested that rules and standards are added to address this.</li> </ul>
247.16	Foodstuffs North Island Limited	General	Oppose	<b>DELETE</b> any provisions within the Proposed District Plan related to the Mangawhai/Hakaru Managed Growth Area. AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>The Mangawhai/Hakaru Managed Growth Area is inappropriate because:</li> <li>It represents an arbitrary spatial limitation on new subdivision and development within an area subject to population growth and demand.</li> <li>Provision of infrastructure and services can be provided to meet the requirements of urban areas.</li> <li>It will unnecessarily restrict growth and improvement of economic and social wellbeing.</li> </ul>
300.36	Bream Tail Residents Association Incorporated	General	Oppose	<b>ADD</b> new standards in the Subdivision chapter, in relation to the following properties: <ol style="list-style-type: none"> <li>54 Mangawhai Heads Road, Mangawhai (LOT 4 DP 310358).</li> <li>47 Cullen Street, Mangawhai (LOT 100 DP 572492).</li> <li>55 Cullen Street, Mangawhai (LOT 9 DP 191042).</li> </ol> The new standards should include a full suite of measures to implement the new policy sought elsewhere in the submission in relation to these properties, including, but not limited to the following: <ol style="list-style-type: none"> <li>The application of a suitable reduced minimum lot size (no less than 4000m<sup>2</sup> net site area) to new sites within 150 metres of the boundary of properties at Bream Tail Farm (Bream Tail) (as identified in the map in Attachment 1 to the submission).</li> <li>Landscape buffer planting to a minimum 5 metres width along the shared boundary of properties at Bream Tail.</li> <li>A setback of building platforms of 20 metres from the shared boundary of properties at Bream Tail.</li> <li>Prohibitions on cats, dogs and mustelids on new sites created.</li> <li>Requirements to construct and maintain a fence along the shared boundary with Bream Tail to prevent animals entering the Bream Tail property.</li> <li>Requirements for no-complaints covenants to be registered on new residential sites created in relation to the continuation of the farming operation at Bream Tail.</li> <li>Requirements for lighting such as down-lighting, orientation and maximum luminescence to avoid adverse effects on the night sky.</li> </ol> AND <b>ADD</b> a spatial layer to show the spatial application of these standards. OR <b>AMEND</b> the zoning of the above properties from General residential zone to General rural zone. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> <li>Refer to submission for detailed reasoning. The submission seeks that an extensive new set of provisions is introduced to the Proposed District Plan in relation to the identified properties adjoining and in proximity to the southern boundary of Bream Tail, in respect to reverse sensitivity, providing an appropriate transition between urban and rural, protection of indigenous biodiversity, and the maintenance and enhancement of rural character, landscape values and amenity values.</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
351.1	N Harre	General	Oppose	<b>AMEND</b> the provisions so that no subdivision is allowed in any Outstanding Natural Landscape.	<ul style="list-style-type: none"> <li>Protecting the District's Natural Features is incredibly important.</li> </ul>
352.11	M Tschirky	General	Oppose	No specific decision requested; however, the submission considers that Baldrock and Pukekaroro need to have full protection as well as any other landmarks in the District.	<ul style="list-style-type: none"> <li>No future subdivision, clearing, quarrying or mining proposals in Outstanding Natural Landscapes and Outstanding Natural Features.</li> </ul>
89.1	HWA KIAT LOW	General	Support	<b>RETAIN</b> the subdivision provisions for the Rural lifestyle zone, applicable to 23 Hinamoki Drive, Kaiwaka.	<ul style="list-style-type: none"> <li>Subdivision can provide opportunities for regional development, economic diversification, community sustainability.</li> <li>Subdivision can create smaller more manageable properties that can support types of land use which contribute to the local economy.</li> <li>Subdivision can encourage population growth in rural areas which helps to sustain education and healthcare facilities and services.</li> <li>Subdivision can preserve New Zealand's natural heritage with appropriate planning and environmental safeguards.</li> </ul>
92.3	Kim Bolton-Stewart	General	Support	<b>AMEND</b> the Proposed District Plan to require subdivisions to enable public access to the foreshore and harbour.	<ul style="list-style-type: none"> <li>The submitter is of the opinion that Open Space for the public is necessary.</li> <li>Every resident should be entitled to visit the foreshore, and gain access to the harbour.</li> </ul>
198.2	R McInnes	General	Support	<b>RETAIN</b> the policies and rules relating to subdivision in the Rural lifestyle zone <b>AND</b> <b>Ensure</b> that subdivision is not only allowed under the Proposed District Plan but is also practically and financially achievable.	<ul style="list-style-type: none"> <li>Submitter supports subdivision rules and policies for Rural lifestyle zone in principle but raises concern that previously feasible subdivisions under the Operative District Plan have become unviable due to rising complexity and costs making the process financially unviable. Submitter urges the Council to ensure that the implementation of the Proposed District Plan genuinely enables the vision for balanced growth and ensuring that the process is clear, proportionate and affordable for everyday families.</li> </ul>
205.4	R Brookes	General	Support	<b>RETAIN</b> Rules SUB-R1 to SUB-R10. <b>AND</b> <b>PROVIDE</b> clarity on how infrastructure servicing capacity will be assessed and ensure servicing obligations are addressed reasonably at the consenting stage.	<ul style="list-style-type: none"> <li>Supports the Subdivision Rules that allow for lot sizes of 600m<sup>2</sup>, but seeks clarification on the availability and capacity of reticulated services within the Marshall Road, Kaiwaka area. The submitter requests that infrastructure requirements including roading upgrades and service extensions are considered during the consent process rather than being imposed via zoning.</li> </ul>
216.60	Cabra Mangawhai Ltd & Pro Land Matters Ltd	General	Support	<b>RETAIN</b> the Subdivision provisions for greenfield development, and the integration of infrastructure with subdivision and development.	<ul style="list-style-type: none"> <li>These provisions support achieving the policy directives of the National Policy Statement for Urban Development</li> </ul>
216.61	Cabra Mangawhai Ltd & Pro Land Matters Ltd	General	Support	<b>RETAIN</b> the Subdivision provisions relating to design standards for walkability, connectivity, and open space in urban zones.	<ul style="list-style-type: none"> <li>The submitter has advised that these provisions support achieving the policy directives of National Policy Statement for Urban Development and will help create liveable well-services communities.</li> </ul>
122.3	Amanda (Mandy) Harris	Overview	Amend	<b>ADD</b> to the Overview of the Subdivision chapter a requirement for Council to not approve significant decisions unless it has first obtained formal input from a qualified climate resilience specialist or professional planner with experience in climate risk assessment, and by a representative of mana whenua with ancestral ties to the affected land or waterways. This should apply to decisions involving: <ul style="list-style-type: none"> <li>Infrastructure exceeding \$1,000,000.</li> <li>Subdivisions of 10 or more lots.</li> </ul> Any rezoning, plan change or amendments to consents in areas that are ecologically sensitive, flood prone or culturally significant.	<ul style="list-style-type: none"> <li>The submitter states Council need to ensure decisions that impact the unique people and ecosystem of Kaipara is not driven by prioritizing individual entitlement beliefs of their rights and freedom to profit over the long term environmental impacts.</li> </ul>
149.68	Royal Forest and Bird Protection Society of New Zealand Incorporated	Overview	Amend	<b>AMEND</b> the Overview in the Subdivision chapter by adding the following: <u>In some cases, subdivision may be inappropriate. This includes situations where subdivision would result in significant adverse effects on indigenous biodiversity by fragmenting habitats, for example. In such cases, the plan directs this type of subdivision to be avoided.</u> <b>AND</b> Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> <li>The submitter considers the Subdivision Overview must include recognition that subdivision may be inappropriate in some cases. For example, where subdivision results in significant adverse effects and requires preservation and protection in accordance with section 6 Resource Management Act, the Regional Policy Statement, National Policy Statement for Indigenous Biodiversity and the New Zealand Coastal Policy Statement. As drafted, the Overview frames subdivision as being acceptable in all instances and only design and layout being precursors</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
					to whether it is acceptable within sensitive environments.
257.15	Piroa Conservation Trust	Overview	Amend	<b>AMEND</b> paragraph two of the Overview of the Subdivision chapter as follows: ... It is important that the design and layout of a subdivision responds to any constraints on the ability of the allotments to be developed. <u>This is particularly so in sensitive environments such as the coastal environment, outstanding natural landscapes and outstanding natural features.</u> Constraints may include significant natural, cultural, historical or ecological features within or adjoining the allotments, the potential impact of development on, or effects of, strategic infrastructure, or risks from natural hazards.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
260.10	The Rise Limited	Overview	Amend	<b>ADD</b> a precinct exemption clause to the Subdivision Overview, similar to that in the Transport chapter. <b>AND</b> Any further necessary consequential amendments required to achieve the relief sought.	<ul style="list-style-type: none"> <li>A precinct exemption clause will provide clarity for plan users.</li> </ul>
269.29	Health New Zealand - Te Whatu Ora	Overview	Amend	<b>AMEND</b> SUB-O4 to enable infrastructure/regionally significant infrastructure. <b>OR</b> <b>ADD</b> a new objective and a new companion policy to the Subdivision chapter that recognises subdivision is necessary to enable infrastructure (as opposed to just subdivision that impacts demand for infrastructure). <b>AND</b> Any necessary proposed/alternative/consequential relief to address matters raised in this submission.	<ul style="list-style-type: none"> <li>The overview and objectives and policies either do not or adequately account for subdivision that is necessary to enable infrastructure / regionally significant infrastructure. Subdivision is sometimes necessary to protect / enable infrastructure and/or support efficient operational delivery. This gap in the policy framework cascades through the subdivision rules but also fails to provide a policy framework within which the assessment of related subdivision can be guided.</li> <li>The submitter seeks relief to address this omission in the policy framework.</li> </ul>
269.54	Health New Zealand - Te Whatu Ora	Overview	Amend	No specific decision requested; however the submission notes a gap in the policy framework in that it does not recognise that subdivision is sometimes necessary to protect/enable infrastructure and/or support efficient operational delivery. This gap in the policy framework cascades through the subdivision rules but also fails to provide a policy framework within which the assessment of related subdivision can be guided.	<ul style="list-style-type: none"> <li>The policy framework does not recognise that subdivision is also necessary to enable infrastructure i.e. address infrastructure supply as well as demand.</li> </ul>
272.16	J & C Hawley	Overview	Amend	<b>AMEND</b> paragraph two of the Overview of the Subdivision chapter as follows: ... It is important that the design and layout of a subdivision responds to any constraints on the ability of the allotments to be developed. <u>This is particularly so in sensitive environments such as the coastal environment, outstanding natural landscapes and outstanding natural features.</u> Constraints may include significant natural, cultural, historical or ecological features within or adjoining the allotments, the potential impact of development on, or effects of, strategic infrastructure, or risks from natural hazards.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
277.9	Mangawhai Hills Limited	Overview	Amend	<b>ADD</b> an exemption clause for Precincts in the Overview of the Subdivision chapter similar to that in the Transport chapter. <b>AND</b> Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> <li>The precinct exemption clause provides clarity for the plan user.</li> </ul>
278.15	Marunui Conservation Ltd	Overview	Amend	<b>AMEND</b> paragraph two of the Overview of the Subdivision chapter as follows: ... It is important that the design and layout of a subdivision responds to any constraints on the ability of the allotments to be developed. <u>This is particularly so in sensitive environments such as the coastal environment, outstanding natural landscapes and outstanding natural features.</u> Constraints may include significant natural, cultural, historical or ecological features within or adjoining the allotments, the potential impact of development on, or effects of, strategic infrastructure, or risks from natural hazards.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>



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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
270.49	Heritage New Zealand Pouhere Taonga	Overview	Support	<b>ADD</b> to the Overview of the Subdivision chapter the following: <u>Note: In addition to the requirements of the District Plan, it should be noted that the Heritage New Zealand Pouhere Taonga Act 2014 ("HNZPTA") requires all applicants to obtain an archaeology authority from the HNZPTA before any archaeological site is modified or destroyed. This is the case regardless of whether the land on which the site is located is designated, or the activity is permitted under the District Plan or a resource or building consent has been granted.</u>	<ul style="list-style-type: none"> <li>HNZPT is concerned that unrecorded archaeology can be accidentally destroyed when undertaking activities within sensitive environments. HNZPT therefore request that a reminder note be added to each relevant section of the Proposed District Plan to raise awareness of responsibilities for landowners and developers under the HNZPT Act 2014.</li> </ul>
330.70	New Zealand Transport Agency	Overview	Support	<b>RETAIN</b> the Overview of the Subdivision chapter as notified.	<ul style="list-style-type: none"> <li>Overview is supported, particularly the references to the objectives and policies in the Infrastructure and Transport chapters.</li> </ul>
149.69	Royal Forest and Bird Protection Society of New Zealand Incorporated	SUB-O1	Amend	<b>AMEND</b> SUB-O1 as follows: Subdivision enables efficient use of land and achieves patterns of development that are consistent with the anticipated land use outcomes for the zone, <u>overlay and site</u> . AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> <li>As areas containing natural character, outstanding natural features and landscapes, and indigenous biodiversity are often not within zones, the submitter expresses concern that the proposed drafting of SUB-O1 neglects overlays. This omission can influence anticipated outcomes.</li> </ul>
273.10	J Grigg	SUB-O1	Amend	<b>PROVIDE</b> a stronger evidence-based infrastructure limitation policy framework (including thresholds tied to infrastructure capacity). AND <b>ADD</b> reference or provisions within the Proposed District Plan for critical servicing and design elements. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The Proposed District Plan proposes a 'more limited subdivision opportunity' but does not include spatial modelling or capacity thresholds which creates ambiguity about when subdivision becomes 'too much'.</li> <li>The Proposed District Plan frequently defers to the Engineering standards which may be amended outside of the plan process which creates uncertainty and disconnect between planning and infrastructure outcomes.</li> </ul>
285.10	S & R Brunt	SUB-O1	Amend	<b>AMEND</b> the Proposed District Plan to provide a stronger, evidence-based infrastructure limitation policy framework including thresholds tied to infrastructure. AND <b>ADD</b> direct reference to or embed critical servicing and design elements into the Proposed District Plan or make subject to consultation if updated. AND Any other relief that is consistent with and/or consequential to this submission.	<ul style="list-style-type: none"> <li>Without quantified thresholds or triggers for infrastructure constraints, there is ambiguity about when subdivision becomes too much.</li> <li>Continuous deferment to the Kaipara District Council Standards creates uncertainty and potential disconnect between planning and infrastructure outcomes.</li> </ul>
287.48	Silver Fern Farms	SUB-O1	Amend	<b>AMEND</b> SUB-O1 as follows: Subdivision enables efficient use of land and achieves patterns of development that are consistent with the anticipated land use outcomes for the zone <u>while avoiding adverse effects on existing activities in adjoining zones</u> . OR Provisions or wording to similar effect. AND Any necessary and consequential amendments. AND All further relief necessary to give effect to the concerns raised in the submission.	<ul style="list-style-type: none"> <li>SUB-O3 refers to reverse sensitivity in the context of rural subdivision, however there is no similar reference for non-rural subdivisions.</li> </ul>
291.11	Tovolea Farm Ltd	SUB-O1	Amend	<b>AMEND</b> the Proposed District Plan to provide a stronger, evidence-based infrastructure limitation policy framework including thresholds tied to infrastructure. AND <b>ADD</b> direct reference to or embed critical servicing and design elements into the Proposed District Plan or made subject to consultation if updated. AND Any other relief that is consistent with and/or consequential to this submission.	<ul style="list-style-type: none"> <li>Without quantified thresholds or triggers for infrastructure constraints, there is ambiguity about when subdivision becomes too much.</li> <li>Continuous deferment to the Kaipara District Council Standards creates uncertainty and potential disconnect between planning and infrastructure outcomes.</li> </ul>
293.21	Vermont Street Partners Limited	SUB-O1	Amend	<b>AMEND</b> the Proposed District Plan to include a zone that provides for rural residential type development on land that no longer has productive ability, noting that the submitter is seeking inclusion of a Large lot residential zone or Rural lifestyle zone as outlined elsewhere in their submission. This submission is in the context of SUB-O1. AND	<ul style="list-style-type: none"> <li>The submitter considers SUB-O1 to be problematic given the application of the General rural zone to large areas that no longer have productive capacity meaning 12ha lots provided for is not an efficient use of land. For areas that do retain productive abilities, 12ha lots are not consistent with the anticipated land use (primary production) and will result in further</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				Any further necessary consequential amendments.	unnecessary fragmentation. The submitter considers this to be a reflection of the blunt approach to zoning in the rural environment.
136.90	Federated Farmers of New Zealand (Inc) - Northland Province	SUB-O1	Support	<b>RETAIN</b> SUB-O1 or words with similar intent. AND Any consequential amendments.	<ul style="list-style-type: none"> <li>• Submitter supports the objective.</li> </ul>
212.16	BA & JK Paton Ltd	SUB-O1	Support	<b>RETAIN</b> SUB-O1. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>• No reasons provided.</li> </ul>
217.197	Cato Bolam Consultants Limited	SUB-O1	Support	<b>AMEND</b> the Proposed District Plan to ensure critical servicing and design elements are directly referenced or embedded within the Proposed District Plan, or made subject to consultation if updated. This request is in the context of SUB-O1. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>• The Mangawhai/Hakaru area is subject to constrained infrastructure. The Proposed District Plan proposes a “more limited subdivision opportunity” there but doesn’t include spatial modelling or capacity thresholds.</li> <li>• Without quantified thresholds or triggers, there’s ambiguity about when subdivision becomes “too much.”</li> <li>• The Proposed District Plan frequently defers to KDC Engineering Standards, which may be amended outside the District Plan process. This creates uncertainty and potential disconnect between planning and infrastructure</li> <li>• outcomes. Resource consents get granted but new infrastructure concerns are raised at engineering approval stage.</li> </ul>
217.49	Cato Bolam Consultants Limited	SUB-O1	Support	<b>ADD</b> a stronger evidence-based infrastructure limitation policy framework, including thresholds tied to infrastructure capacity (water, wastewater, roading). This request is in the context of SUB-O1. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>• The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> <li>• The Mangawhai/Hakaru area is subject to constrained infrastructure. The Proposed District Plan proposes a “more limited subdivision opportunity” there but doesn’t include spatial modelling or capacity thresholds.</li> <li>• Without quantified thresholds or triggers, there’s ambiguity about when subdivision becomes “too much.”</li> <li>• The Proposed District Plan frequently defers to KDC Engineering Standards, which may be amended outside the District Plan process. This creates uncertainty and potential disconnect between planning and infrastructure</li> <li>• outcomes. Resource consents get granted but new infrastructure concerns are raised at engineering approval stage.</li> </ul>
309.73	Clarus	SUB-O1	Support	<b>RETAIN</b> SUB-O1. 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"> <li>• The provision is necessary and appropriate.</li> </ul>
315.37	Horizon Surveying & Land Development	SUB-O1	Support	<b>RETAIN</b> SUB-O1.	<ul style="list-style-type: none"> <li>• No reasons provided.</li> </ul>
330.71	New Zealand Transport Agency	SUB-O1	Support	<b>RETAIN</b> SUB-O1 as notified.	<ul style="list-style-type: none"> <li>• Objective is supported as it emphasises efficient use of land and that outcomes need to be consistent with the outcomes for the zone.</li> </ul>
245.17	C & R Williamson	SUB-O2		<b>DELETE</b> SUB-O2. AND Any further necessary consequential amendments required.	<ul style="list-style-type: none"> <li>• As proposed SUB-O2 urban subdivision applies to all subdivision within urban zones, which include commercial, light and heavy industrial zones. It is considered that this objective as proposed is too narrow to accommodate all types of subdivision in all urban zones. For example, Clause 1 requires subdivision to be sympathetic to the context and characteristics of the site and clause 5 requires the contribution to creating a sense of place these may be extremely limiting, particularly if a site has been appropriately zoned for Light or Heavy Industrial. Clause 3 seeks to consolidate urban development</li> </ul>

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### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
					which is completely unnecessary as the spatial distribution of zoning has already been identified based upon consolidation.
300.31	Bream Tail Residents Association Incorporated	SUB-O2	Amend	<b>AMEND</b> SUB-O2 to also require that subdivision in urban zones avoids reverse sensitivity effects on adjoining and nearby primary production activities in rural zones and precincts. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> <li>The objective fails to specify an appropriate outcome in respect to the management of reverse sensitivity, particularly at the interface of rural and urban zones. Policies 5.1.1 and 5.1.3 of the Regional Policy Statement direct that the potential for reverse sensitivity effects is avoided.</li> </ul>
231.28	S Cullen	SUB-O2	Oppose	<b>DELETE</b> SUB-O2 AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>It is considered that this objective as proposed is too narrow to accommodate all types of subdivision in all urban zones. Some clauses may be extremely limiting, particularly if a site has been appropriately zoned for Light or Heavy Industrial. Consolidating urban development is unnecessary as the spatial distribution of zoning has already been identified.</li> </ul>
256.15	P Ryan	SUB-O2	Oppose	<b>DELETE</b> SUB-O2. AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>As proposed SUB-O2 urban subdivision applies to all subdivision within urban zones, which include commercial, light and heavy industrial zones.</li> <li>The objective is too narrow to accommodate all types of subdivision in all urban zones.</li> </ul>
260.11	The Rise Limited	SUB-O2	Oppose	<b>DELETE</b> SUB-O2. AND Any further necessary consequential amendments required to achieve the relief sought.	<ul style="list-style-type: none"> <li>The submitter opposes SUB-O2 and requests its deletion. As proposed, the Objective applies to all subdivision in urban zones (including commercial, light and heavy industrial zones). The submitter considers SUB-O2 to be too narrow to accommodate all types of subdivision in all urban zones.</li> <li>E.g., Clause 1 requires subdivision is sympathetic to the context and characteristics of the site and clause 5 requires the subdivision to contribute to a sense of place. These requirements can be limiting, particularly if a site has been appropriately zoned as Light or Heavy Industrial. Moreover, clause 3 is unnecessary.</li> </ul>
277.10	Mangawhai Hills Limited	SUB-O2	Oppose	<b>DELETE</b> SUB-O2. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> <li>The objective as proposed is too narrow to accommodate all types of subdivision in all urban zones.</li> </ul>
281.10	Moonlight Heights Limited	SUB-O2	Oppose	<b>DELETE</b> SUB-O2. AND Any further necessary consequential amendments required.	<ul style="list-style-type: none"> <li>SUB-O2 applies to all subdivision within urban zones which includes commercial, light and heavy industrial zones.</li> <li>This objective is too narrow to accommodate all types of subdivision in all urban zones. For example: Clause 1 requires subdivision to be sympathetic to the context and characteristics of the site, and Clause 5 requires the contribution to creating a sense of place these may be limiting, particularly if a site has been zoned as industrial.</li> <li>Clause 3 seeks to consolidate urban development which is completely unnecessary as the spatial distribution of zoning has been identified based on consolidation.</li> </ul>
282.20	Murphy Property Development Limited	SUB-O2	Oppose	<b>DELETE</b> SUB-O2. AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>SUB-O2 applies to all subdivision within urban zones, which include commercial, light and heavy industrial zones. The objective is too narrow to accommodate all types of subdivision in all urban zones.</li> <li>For example, Clause 1 and clause 5 may be extremely limiting. Clause 3 is unnecessary as the spatial distribution of zoning has already been identified based upon consolidation.</li> </ul>
331.8	Northland Holdings 2016 Limited	SUB-O2	Oppose	<b>DELETE</b> SUB-O2. AND Any further necessary consequential amendments required to achieve the relief sought.	<ul style="list-style-type: none"> <li>As drafted, SUB-O2 applies to all subdivision within urban zones, which includes commercial, light and heavy industrial zones. The submitter considers SUB-O2 is too narrow to accommodate all types of subdivision in all urban zones.</li> <li>E.g. SUB-O2.1. requires subdivision to be sympathetic to the context and characteristics of the site, and SUB-O5.5. requires contribution to creating a sense of place. Such requirements may be extremely limiting if</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
					a site has been appropriately zoned as Light or Heavy industrial. SUB-O2.3. seeks to consolidate urban development, which the submitter considers unnecessary as spatial distribution of zoning is based upon consolidation.
217.50	Cato Bolam Consultants Limited	SUB-O2	Support	<b>RETAIN</b> SUB-O2. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> </ul>
309.132	Clarus	SUB-O2	Support	<b>RETAIN</b> SUB-O2. 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"> <li>The provision is necessary and appropriate.</li> </ul>
315.129	Horizon Surveying & Land Development	SUB-O2	Support	<b>RETAIN</b> SUB-O2.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
330.72	New Zealand Transport Agency	SUB-O2	Support	<b>RETAIN</b> SUB-O2. AND <b>AMEND</b> SUB-O2 as follows: Subdivision in urban zones: <ol style="list-style-type: none"> <li>Responds sympathetically to the context and characteristics of the site;</li> <li>Creates allotments that can accommodate anticipated land use activities;</li> <li>Consolidates urban development;</li> <li>For large subdivisions utilises structure planning to achieve land use and infrastructure integration and coordinated delivery;</li> <li>Promotes the health, safety and wellbeing of communities; ...</li> </ol> AND Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.	<ul style="list-style-type: none"> <li>Objective is supported particularly point 3 to 'consolidate urban development' within urban zones.</li> <li>Supports urban development and subdivision occurring within locations identified for growth, and in particular where those growth areas have progressed through a structure plan, master plan or similar process.</li> <li>These processes achieve integration between land use and infrastructure (particularly State highways), to coordinate timing and form of infrastructure upgrades, and to achieve good urban design outcomes.</li> <li>The extent of General residential zone areas proposed are currently well in excess of projected demand over the ten year 'life' of the district plan and will not promote consolidated urban development.</li> <li>The use of structure planning will provide a means to achieve the coordinated delivery of infrastructure and integration between land use and infrastructure.</li> </ul>
110.17	Astute Consulting	SUB-O3	Amend	<b>No specific decision requested.</b> The submission refers to SUB-O3 in the context of promoting flexibility for people to work and live in a rural environment and considers this directly conflicts with GRUZ-R19 and GRUZ-R20 where commercial and industrial activities are non-complying.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
140.57	Horticulture New Zealand	SUB-O3	Amend	<b>DELETE</b> SUB-O3(3) AND Any consequential or alternative amendments required to address the concerns raised by the submitter.	<ul style="list-style-type: none"> <li>The submitter does not consider that this clause should apply within a rural environment (i.e., General rural zone) and is more appropriate for the Rural lifestyle zone.</li> </ul>
149.70	Royal Forest and Bird Protection Society of New Zealand Incorporated	SUB-O3	Amend	<b>ADD</b> a new clause to SUB-O3 as follows: <u>Protects significant indigenous biodiversity from fragmentation and manages adverse effects in accordance with Ecosystems and Indigenous Biodiversity chapter provisions.</u> AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> <li>Remnants of indigenous biodiversity and habitats for specified highly mobile fauna are often within the Rural zone. Subdivision within the Rural zone can, therefore, lead to habitats being fragmented and ecological processes being disrupted especially if land is divided into separate titles with differing management approaches.</li> <li>The submitter requests that SUB-O3 is amended to expressly recognise the potential ecological impacts of subdivision within the Rural zone. This amendment is sought to support the protection and enhancement of indigenous biodiversity and ecological connectivity.</li> </ul>
212.17	BA & JK Paton Ltd	SUB-O3	Amend	<b>ADD</b> policy direction that emphasises a preference for ecological benefit subdivision in the General rural zone. and <b>ADD</b> criteria to SUB-O3.3 to clarify the degree of flexibility. and <b>ADD</b> transferrable title rights for the ecological benefit in the General rural zone for subdivision in Rural lifestyle zone. and Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>No adequate encouragement or mechanism to use ecological benefit in the General rural zone is provided, creating risk of net loss of significant ecological and/or landscape features and/or it's detrimental fragmentation.</li> </ul>
273.11	J Grigg	SUB-O3	Amend	No particular relief has been sought; however, the submitter supports SUB-O4 in part.	<ul style="list-style-type: none"> <li>The Mangawhai/Hakaru area is stated to be subject to constrained infrastructure, however the MHMG does</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				AND Any other relief that is consistent with and/or consequential to the submission.	not support subdivision where infrastructure is available or not significantly constrained.
282.21	Murphy Property Development Limited	SUB-O3	Amend	<b>ADD</b> the following clause to SUB-O3: <u>d. Enables rural lifestyle within the Rural lifestyle zone.</u> AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>As proposed SUB-O3 rural subdivision applies to all subdivision within rural zones, which includes General rural zone and Rural lifestyle zone. SUB-O3 fails to acknowledge rural lifestyle subdivision.</li> </ul>
291.12	Tovolea Farm Ltd	SUB-O3	Amend	<b>ADD</b> policy direction that emphasizes a preference for ecological benefit subdivision in the General rural zone. AND <b>ADD</b> criteria to support SUB-O3.3 that clarify the degree of flexibility. AND <b>ADD</b> transferable title rights for ecological benefit in General rural zone for subdivision in Rural lifestyle zone. AND Any other relief that is consistent with and/or consequential to this submission.	<ul style="list-style-type: none"> <li>Limited encouragement or mechanism for subdivision of larger sites to create small lots and productive balance lots where this demonstrates avoidance of land fragmentation.</li> </ul>
293.22	Vermont Street Partners Limited	SUB-O3	Amend	<b>AMEND</b> the Proposed District Plan to include a zone that provides for rural residential type development on land that no longer has productive ability, noting that the submitter is seeking inclusion of a Large lot residential zone or Rural lifestyle zone as outlined elsewhere in their submission. This submission is in context of SUB-O3. AND Any further necessary consequential amendments.	<ul style="list-style-type: none"> <li>The subdivision rules for the General rural zone will not achieve the outcomes sought by objective SUB-O3. The provision for 12ha lots and the expansive application of the General rural zone across the district will result in unnecessary fragmentation; it will not enable primary production or provide flexibility to enable people to live and work in the rural environment.</li> </ul>
310.29	Fonterra Limited	SUB-O3	Amend	<b>AMEND</b> SUB-O3, as follows: Subdivision in rural zones: 1. Enables primary production activities to both establish and continue to operate; 2. Protects highly productive land from fragmentation and reverse sensitivity effects; and 3. Provides flexibility to enable people to work and live in a rural environment.; and 4. <u>Protects primary production activities (including associated manufacturing and processing activities) from reverse sensitivity effects.</u>	<ul style="list-style-type: none"> <li>Consistent with the Operative District Plan, Fonterra is seeking a site-specific rule requiring a discretionary activity subdivision consent for any subdivision within the Maungatūroto Dairy Factory Noise Sensitive Area to avoid potential reverse sensitivity effects, so seeks some appropriate amendments to objective SUB-O3 to reflect this.</li> </ul>
315.38	Horizon Surveying & Land Development	SUB-O3	Amend	<b>AMEND</b> SUB-O3 to reflect fragmented land typologies.	<ul style="list-style-type: none"> <li>Does not appropriately account for already fragmented land. These sites require a different planning response than large, productive rural blocks.</li> </ul>
331.9	Northland Holdings 2016 Limited	SUB-O3	Amend	<b>ADD</b> the following clause to SUB-O3: 3. <u>Enables rural lifestyle within the Rural lifestyle zone.</u> AND Any further necessary consequential amendments required to achieve the relief sought.	<ul style="list-style-type: none"> <li>As drafted, SUB-O3 applies to all subdivision within rural zones, including the General rural and Rural lifestyle zone but does not acknowledge rural lifestyle subdivision.</li> </ul>
77.7	Richard (Rick) Ruiterman	SUB-O3	Oppose	<b>AMEND</b> the minimum lot size for subdivision in the General rural zone from 12ha to 20ha.	<ul style="list-style-type: none"> <li>The subdivision rules for the General rural zone will not achieve the outcomes sought by SUB-O3.</li> <li>The provision for 12ha lots and the expansive application of the General Rural zone across the district will result in unnecessary fragmentation.</li> <li>General rural areas are being allowed to be fragmented which is contradictory to the objectives for the zone. Rural areas which have already been fragmented into rural residential lots such as Paul Road, Lake View Estate, the sanctuary, Mangawhai, King Road, Mangawhai have been zoned general rural and areas such a Paparoa surrounds are to be rural lifestyle further fragmenting larger blocks of rural land.</li> </ul>
136.91	Federated Farmers of New Zealand (Inc) - Northland Province	SUB-O3	Support	<b>RETAIN</b> SUB-O3 as notified. OR Words with similar intent. AND Any consequential amendments.	<ul style="list-style-type: none"> <li>The submitter supports SUB-O3.</li> </ul>
217.198	Cato Bolam Consultants Limited	SUB-O3	Support	<b>AMEND</b> SUB-O3.3 to include criteria which clarifies the degree of flexibility. AND	<ul style="list-style-type: none"> <li>The submitter has requested the above resolution as there is currently no adequate encouragement or mechanism to use ecological benefit in General rural zone, and there is a risk of net loss of significant</li> </ul>

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### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				Any other relief that is consistent with and/or consequential to the submission.	ecological and/or landscape features and/or its detrimental fragmentation.
217.199	Cato Bolam Consultants Limited	SUB-O3	Support	<b>ADD</b> transferable title rights for ecological benefit in the General rural zone for subdivision in Rural lifestyle zone. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has requested the above resolution as there is currently no adequate encouragement or mechanism to use ecological benefit in General rural zone, and there is a risk of net loss of significant ecological and/or landscape features and/or its detrimental fragmentation.</li> </ul>
217.51	Cato Bolam Consultants Limited	SUB-O3	Support	<b>ADD</b> policy direction that emphasises a preference for ecological benefit in the General rural zone. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has requested the above resolution as there is currently no adequate encouragement or mechanism to use ecological benefit in General rural zone, and there is a risk of net loss of significant ecological and/or landscape features and/or its detrimental fragmentation.</li> <li>In addition, the submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> </ul>
217.52	Cato Bolam Consultants Limited	SUB-O3	Support	<b>RETAIN</b> SUB-O4. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> </ul>
253.12	McRobbie Dowling Limited	SUB-O3	Support	<b>RETAIN</b> SUB-O3.	<ul style="list-style-type: none"> <li>Submitter supports the rural subdivision which is enabling of primary production activities to both establish and continue to operate and provides for employment opportunities in the rural environment.</li> </ul>
285.11	S & R Brunt	SUB-O3	Support	No specific decision requested; however, the submission supports in part SUB-O4 and observes that the Mangawhai/Hakaru Growth Area does not support subdivision where infrastructure is available or not significantly constrained. AND Any other relief that is consistent with and/or consequential to this submission.	<ul style="list-style-type: none"> <li>The Mangawhai/Hakaru area is stated to be subject to constrained infrastructure, however the Mangawhai/Hakaru Growth Area does not support subdivision where infrastructure is available or not significantly constrained.</li> </ul>
291.13	Tovolea Farm Ltd	SUB-O3	Support	No specific decision sought; however the submission supports in part SUB-O4 without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps. AND Any other relief that is consistent with and/or consequential to this submission.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
309.133	Clarus	SUB-O3	Support	<b>RETAIN</b> SUB-O3. 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"> <li>The provision is necessary and appropriate.</li> </ul>
330.73	New Zealand Transport Agency	SUB-O3	Support	<b>RETAIN</b> SUB-O4. AND <b>AMEND</b> SUB-O4 as follows: Subdivision is integrated with infrastructure services in an efficient, effective and coordinated manner <u>through use of structure planning to achieve land use and infrastructure integration.</u> AND Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.	<ul style="list-style-type: none"> <li>Objective is supported.</li> <li>Formulation of a structure plan, master plan or similar process provides a means to achieve integration between land use and infrastructure (particularly State highways).</li> <li>Enables coordination of timing and the form of infrastructure upgrades, and to achieve good urban design outcomes.</li> <li>Particularly important given the context of the substantial over-supply of 'live' zoned General residential zone land proposed.</li> </ul>
212.18	BA & JK Paton Ltd	SUB-O4	Support	<b>RETAIN</b> SUB-O4. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
283.165	Northpower Limited and Northpower Fibre Limited	SUB-O4	Support	<b>RETAIN</b> SUB-O4 as notified.	<ul style="list-style-type: none"> <li>The submitter supports this objective.</li> </ul>



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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
308.44	Fire and Emergency New Zealand	SUB-O4	Support	<b>RETAIN</b> SUB-O4 as notified.	<ul style="list-style-type: none"> <li>It is important that subdivision is serviced by infrastructure that is efficient, effective and coordinated (particularly water supply and roading).</li> </ul>
309.134	Clarus	SUB-O4	Support	<b>RETAIN</b> SUB-O4. 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"> <li>The provision is necessary and appropriate.</li> </ul>
315.130	Horizon Surveying & Land Development	SUB-O4	Support	<b>RETAIN</b> SUB-O4.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
212.19	BA & JK Paton Ltd	SUB-O5	Support	<b>RETAIN</b> SUB-O5. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
217.53	Cato Bolam Consultants Limited	SUB-O5	Support	<b>RETAIN</b> SUB-O5. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> </ul>
267.16	Northland Fish and Game Council	SUB-O5	Support	<b>RETAIN</b> SUB-O5 as notified.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
309.135	Clarus	SUB-O5	Support	<b>RETAIN</b> SUB-O5. 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"> <li>The provision is necessary and appropriate.</li> </ul>
315.131	Horizon Surveying & Land Development	SUB-O5	Support	<b>RETAIN</b> SUB-O5.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
245.18	C & R Williamson	SUB-P1		<b>DELETE</b> SUB-P1. AND Any further necessary consequential amendments required.	<ul style="list-style-type: none"> <li>SUB-P1 outlines general subdivision design and location outcomes, which apply to all zones. Clause 1 seeks the incorporation of and response to existing site features and characteristics, including landforms, vegetation, buildings and cultural and amenity values. Again, it is considered that this policy is too narrow when applied to all zones, particularly those zones which have a lower level of amenity and are expected to have a high level of modification such as the commercial, light and heavy industrial zones. Not all vegetation should be incorporated in a subdivision design and it is considered that the Natural Environmental Values provisions afford sufficient protection.</li> </ul>
149.71	Royal Forest and Bird Protection Society of New Zealand Incorporated	SUB-P1	Amend	<b>AMEND</b> SUB-P1.1. by inserting 'waterbodies' and 'habitat of indigenous species' AND <b>ADD</b> a new clause to SUB-P1 requiring subdivision design and location to maintain the health and wellbeing of water bodies and freshwater ecosystems. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> <li>The submitter opposes SUB-P1 in part as subdivision can result in adverse effects on water bodies, freshwater ecosystems, and indigenous biodiversity if such values are not considered in design and location. It is requested that SUB-P1 be amended to require subdivision design and location to recognise such potential adverse effects and avoid, remedy and mitigate them.</li> </ul>
212.20	BA & JK Paton Ltd	SUB-P1	Amend	<b>AMEND</b> SUB-P1.4 to read as follows: <u>Encourage provision of</u> Provide efficient multi-modal transport connections in urban areas; and AND No specific decision requested; however the submission considers that SUB-P1.5 "efficient" use of infrastructure may be unclear depending on how the rules are drafted. Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
270.50	Heritage New Zealand Pouhere Taonga	SUB-P1	Amend	<b>ADD</b> to the following clause to SUB-P1: 6. <u>Ensure any adverse effects on heritage, archaeological and sites and areas of significance to Māori are identified and minimised, in consultation with Tangata Whenua and/or a suitably qualified and</u>	<ul style="list-style-type: none"> <li>HNZPT considers it to be important the any subdivision activity is required to consider any adverse effects on sites and areas of significance to Māori and historic heritage. These are matter of</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<u>experienced heritage/archaeologist professional, as appropriate.</u>	national importance under the Resource Management Act.
283.166	Northpower Limited and Northpower Fibre Limited	SUB-P1	Amend	<b>ADD</b> a clause to SUB-P1 as follows: Enable subdivision that is designed and located to: ... 6. <u>Protect the electricity and telecommunications infrastructure networks from reverse sensitivity effects.</u> AND Any further necessary consequential amendments required.	<ul style="list-style-type: none"> <li>To ensure that existing electricity and telecommunications infrastructure is not compromised.</li> <li>To protect electricity and telecommunication infrastructure networks.</li> <li>To achieve alignment with the Regional Policy Statement.</li> </ul>
287.49	Silver Fern Farms	SUB-P1	Amend	<b>AMEND</b> SUB-P1.3, as follows: Enable subdivision that is designed and located to: ... 3. Avoid or appropriately mitigate the risks of natural hazards <u>or reverse sensitivity effects;</u> OR Provisions or wording to similar effect. AND Any necessary and consequential amendments. AND All further relief necessary to give effect to the concerns raised in the submission.	<ul style="list-style-type: none"> <li>To give effect to the amendment sought by the submitter to SUB-O1, it is appropriate to reference cross-zone effects in the policy.</li> </ul>
300.32	Bream Tail Residents Association Incorporated	SUB-P1	Amend	<b>AMEND</b> SUB-P1 to also enable subdivision only where it avoids reverse sensitivity effects on adjoining and nearby primary production activities in rural zones and precincts. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> <li>The objective fails to specify an appropriate outcome in respect to the management of reverse sensitivity, particularly at the interface of rural and urban zones. Policies 5.1.1 and 5.1.3 of the Regional Policy Statement direct that the potential for reverse sensitivity effects is avoided. SUB-P1 should also be amended to implement SUB-O3.</li> </ul>
315.39	Horizon Surveying & Land Development	SUB-P1	Amend	<b>AMEND</b> SUB-P1 to incorporate best practice subdivision design principles, including site-responsive layouts, protection of natural features, and integrated infrastructure design.	<ul style="list-style-type: none"> <li>SUB-P1 could better reflect best practice subdivision design. Submitter considers that as proposed, the policy lacks direction on these matters.</li> </ul>
231.29	S Cullen	SUB-P1	Oppose	<b>DELETE</b> SUB-P1. AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>It is considered that this policy is too narrow when applied to all zones, particularly those zones which have a lower level of amenity and are expected to have a high level of modification such as the Commercial, Light and Heavy industrial zones.</li> <li>Not all vegetation should be incorporated in a subdivision design, and it is considered that the Natural Environmental Values provisions afford sufficient protection.</li> </ul>
248.27	Journeys End Limited	SUB-P1	Oppose	<b>DELETE</b> SUB-P1. AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>Policy is too narrow when applied to all zones, particularly those zones which have a lower level of amenity and are expected to have a high level of modification such as the commercial, light and heavy industrial zones.</li> <li>Not all vegetation should be incorporated in a subdivision design and it is considered that the Natural Environmental Values provisions afford sufficient protection.</li> </ul>
253.13	McRobbie Dowling Limited	SUB-P1	Oppose	<ul style="list-style-type: none"> <li>Policy is too narrow when applied to all zones.</li> <li>Not all vegetation should be incorporated in a subdivision design.</li> <li>Submitter considers the Natural Environment Values provisions afford sufficient protection.</li> </ul>	
256.16	P Ryan	SUB-P1	Oppose	<b>DELETE</b> SUB-P1. AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>As proposed SUB-O2 urban subdivision applies to all subdivision within urban zones, which include commercial, light and heavy industrial zones.</li> <li>The objective is too narrow to accommodate all types of subdivision in all urban zones.</li> </ul>
260.12	The Rise Limited	SUB-P1	Oppose	<b>DELETE</b> SUB-P1. AND Any further necessary consequential amendments required to achieve the relief sought.	<ul style="list-style-type: none"> <li>SUB-P1 is too narrow when applied to all zones, particularly zones with lower levels of amenity where high levels of modification are expected (i.e., commercial, light and heavy industrial zones). Natural environment provisions afford sufficient protection without incorporating vegetation into subdivision designs.</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
277.11	Mangawhai Hills Limited	SUB-P1	Oppose	<b>DELETE</b> SUB-P1. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> <li>This policy is too narrow when applied to all zones, particularly those which have a lower level of amenity and are expected to have a high level of modification (commercial, light and heavy industrial).</li> <li>No all vegetation should be incorporated in a subdivision design.</li> <li>The Natural Environmental Values provisions afford sufficient protection.</li> </ul>
281.11	Moonlight Heights Limited	SUB-P1	Oppose	<b>DELETE</b> SUB-P1. AND Any further necessary consequential amendments required.	<ul style="list-style-type: none"> <li>SUB-P1 outlines general subdivision design and location outcomes, which apply to all zones.</li> <li>Clause 1 seeks the incorporation of and response to existing site features and characteristics.</li> <li>The policy is considered too narrow when applied to all zones, particularly those which have a lower level of amenity and are expected to have a high level of modification such as commercial and industrial zones.</li> <li>Not all vegetation should be incorporated in a subdivision design and it is considered that the Natural Environmental Values provisions afford sufficient protection.</li> </ul>
282.22	Murphy Property Development Limited	SUB-P1	Oppose	<b>DELETE</b> SUB-P1. AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>This policy is too narrow when applied to all zones, particularly those zones which have a lower level of amenity and are expected to have a high level of modification such as the commercial, light and heavy industrial zones.</li> <li>Not all vegetation should be incorporated in a subdivision design and it is considered that the Natural Environmental Values provisions afford sufficient protection.</li> </ul>
293.23	Vermont Street Partners Limited	SUB-P1	Oppose	<b>DELETE</b> SUB-P1. AND Any further necessary consequential amendments.	<ul style="list-style-type: none"> <li>It is considered that this policy is too narrow when applied to all zones, particularly those zones which have a higher degree of development (e.g., the Large Lot residential zone or Rural lifestyle zone that VSPL are seeking). Not all vegetation should be incorporated in a subdivision design and it is considered that the Natural Environmental Values provisions afford sufficient protection.</li> </ul>
331.10	Northland Holdings 2016 Limited	SUB-P1	Oppose	<b>DELETE</b> SUB-P1. AND Any further necessary consequential amendments required to achieve the relief sought.	<ul style="list-style-type: none"> <li>The submitter opposes this policy and considers it is too narrow when applied to all zones, particularly zones which have a lower level of amenity and are expected to have a high level of modification (e.g., commercial, light and heavy industrial).</li> <li>Natural Environment Values provisions provide sufficient protection.</li> </ul>
217.54	Cato Bolam Consultants Limited	SUB-P1	Support	<b>AMEND</b> SUB-P1.4. as follows: <u>Encourage provision of</u> Provide efficient multi-modal transport connections in urban areas; AND <b>AMEND</b> SUB-P1.5 to make "efficient" use of infrastructure clearer. Taking into consideration the drafting of the rules. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> <li>SUB-P1.4 requirements may be unclear or too limiting depending on how the rules are drafted.</li> <li>SUB-P1.5 the term 'efficient' use of infrastructure may be unclear depending on how the rules are drafted.</li> </ul>
308.45	Fire and Emergency New Zealand	SUB-P1	Support	<b>RETAIN</b> SUB-P1 as notified.	<ul style="list-style-type: none"> <li>The submission supports SUB-P1 to the extent that it seeks to enable subdivision that is designed and located to avoid or appropriately mitigate the risks of natural hazards, provide efficient multi-modal transport connections in urban areas and promote the efficient use of infrastructure.</li> </ul>
330.74	New Zealand Transport Agency	SUB-P1	Support	<b>RETAIN</b> SUB-P1 as notified.	<ul style="list-style-type: none"> <li>Policy is supported, particularly points 4 and 5 regarding provision for efficient multi-modal transport connections in urban areas, and the efficient use of infrastructure.</li> </ul>
245.19	C & R Williamson	SUB-P2		<b>AMEND</b> SUB-P2.4. as follows: Ensure that subdivision and development is appropriately serviced, and that infrastructure is provided in an integrated and coordinated manner, by: ...	<ul style="list-style-type: none"> <li>SUB-P2 details infrastructure servicing requirements for all zones. This policy has been framed with a narrow lens, it fails to consider practical onsite solutions for servicing, nor does it provide for servicing of the Rural lifestyle zone.</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<p>4. Requiring allotments <u>within an area of benefit</u> to connect to the Council's reticulated systems <del>where practicable</del>, except in the General rural zone;</p> <p>AND</p> <p>Any further necessary consequential amendments required.</p>	
149.72	Royal Forest and Bird Protection Society of New Zealand Incorporated	SUB-P2	Amend	<p><b>AMEND</b> SUB-P2 to reference Infrastructure objectives, policies and rules.</p> <p>AND</p> <p><b>AMEND</b> SUB-P2 to include outcomes for stormwater quality and quantity management that:</p> <ul style="list-style-type: none"> <li>• Maintain or improve freshwater health and the mauri of water bodies and receiving environments;</li> <li>• Avoid or minimise adverse effects of stormwater discharges on the coastal environment;</li> <li>• Incorporate provisions to achieve or contribute to the achievement of Te Mana o te Wai;</li> <li>• Minimise changes to natural flow regimes and hydrological connectivity; and</li> <li>• Support the life-supporting capacity, ecosystem health, and natural character of freshwater and coastal receiving environments.</li> </ul> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> <li>• SUB-P2 is opposed in part as notified. Subdivision introduces greater quantities of stormwater into waterways. If not treated, increased flows and contaminants contained within stormwater will affect the health and wellbeing of water bodies and freshwater ecosystems.</li> <li>• The New Zealand Coastal Policy Statement provides direction on managing stormwater discharges. The submitter considers that SUB-P2 requires amendment in order to respond to direction within the National Policy Statement for Freshwater Management and New Zealand Coastal Policy Statement.</li> </ul>
212.21	BA & JK Paton Ltd	SUB-P2	Amend	<p><b>AMEND</b> SUB-P2.4 as follows:</p> <p>Requiring allotments to connect to the Council's reticulated systems where practicable, except in the General rural zone <u>and the Rural lifestyle zone</u>;</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"> <li>• SUB-P2.4 should also include an exception for the Rural lifestyle zone. It is inappropriate to require rural subdivision to connect to the Council's reticulated systems.</li> </ul>
231.30	S Cullen	SUB-P2	Amend	<p><b>AMEND</b> SUB-P2.4 as follows:</p> <p>...</p> <p>4. Requiring allotments <u>within an area of benefit</u> to connect to the Council's reticulated systems <del>where practicable</del>, except in the General rural zone;</p> <p>AND</p> <p>Any necessary consequential amendments.</p>	<ul style="list-style-type: none"> <li>• SUB-P2 details infrastructure servicing requirements for all zones, this policy has been framed with a narrow lens, it fails to consider practical onsite solutions for servicing.</li> </ul>
248.28	Journeys End Limited	SUB-P2	Amend	<p><b>AMEND</b> SUB-P2.4 as follows:</p> <p>Ensure that subdivision and development is appropriately serviced, and that infrastructure is provided in an integrated and coordinated manner, by:</p> <p>...</p> <p>1. Requiring allotments <u>within an area of benefit</u> to connect to the Council's reticulated systems <del>where practicable</del>, except in the General rural zone;</p> <p>AND</p> <p>Any necessary consequential amendments.</p>	<ul style="list-style-type: none"> <li>• This policy has been framed with a narrow lens; it fails to consider practical onsite solutions for servicing.</li> </ul>
253.14	McRobbie Dowling Limited	SUB-P2	Amend	<p><b>AMEND</b> SUB-P2.4 as follows:</p> <p>4. Requiring allotments <u>within an area of benefit</u> to connect to the Council's reticulated systems <del>where practicable</del>, except in the General rural zone;</p> <p>AND</p> <p>Any necessary consequential amendments.</p>	<ul style="list-style-type: none"> <li>• Policy has been framed with a narrow lens and fails to consider practical onsite solutions for servicing.</li> </ul>
256.17	P Ryan	SUB-P2	Amend	<p><b>AMEND</b> SUB-P2.4 as follows:</p> <p>1. Requiring allotments <u>within an area of benefit</u> to connect to the Council's reticulated systems <del>where practicable</del>, except in the General rural zone;</p> <p>AND</p> <p>Any necessary consequential amendments.</p>	<ul style="list-style-type: none"> <li>• Policy has been framed with too narrow of a lens, it fails to consider practical onsite solutions for servicing and does not provide for servicing of the Rural living zone.</li> </ul>
273.12	J Grigg	SUB-P2	Amend	<p><b>AMEND</b> SUB-P2.4 to include an exception for the Rural lifestyle zone as follows.</p> <p>Requiring allotments to connect to the Council's reticulated systems where practicable, except in the General rural zone, <u>and the Rural lifestyle zone</u>;</p> <p>AND</p>	<ul style="list-style-type: none"> <li>• It is inappropriate to require rural subdivision to connect to Council's reticulated systems.</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				Any other relief that is consistent with and/or consequential to the submission.	
282.23	Murphy Property Development Limited	SUB-P2	Amend	<b>AMEND</b> SUB-P2 as follows: Ensure that subdivision and development is appropriately serviced, and that infrastructure is provided in an integrated and coordinated manner, by: ... 4. Requiring allotments <u>within an area of benefit</u> to connect to the Council's reticulated systems <del>where practicable, except in the General rural zone;</del> AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>This policy has been framed with a narrow lens, it fails to consider practical onsite solutions for servicing nor does it provide for servicing of the Rural lifestyle zone.</li> </ul>
285.12	S & R Brunt	SUB-P2	Amend	<b>AMEND</b> SUB-P2.4, as follows: Requiring allotments to connect to the Council's reticulated systems where practicable, except in the General rural zone <u>and the Rural lifestyle zone;</u> AND Any other relief that is consistent with and/or consequential to this submission.	<ul style="list-style-type: none"> <li>It is inappropriate to require Rural Lifestyle subdivision to connect to the Council's reticulated systems.</li> </ul>
293.24	Vermont Street Partners Limited	SUB-P2	Amend	<b>AMEND</b> SUB-P2.4 as follows: 4. Requiring allotments <u>within an area of benefit</u> to connect to the Council's reticulated systems <del>where practicable, except in the General rural zone;</del> AND Any further necessary consequential amendments.	<ul style="list-style-type: none"> <li>This policy has been framed with a narrow lens, it fails to consider practical onsite solutions for servicing nor does it provide for servicing of a future Large lot residential zone or Rural lifestyle zone.</li> </ul>
331.11	Northland Holdings 2016 Limited	SUB-P2	Amend	<b>AMEND</b> SUB-P2.4. as follows: 4. Requiring allotments <u>within an area of benefit</u> to connect to the Council's reticulated systems <del>where practicable, except in the General rural zone;</del> AND Any further necessary consequential amendments required to achieve the relief sought.	<ul style="list-style-type: none"> <li>The policy has been framed in a narrow lens and fails to consider practical onsite servicing solutions.</li> </ul>
136.92	Federated Farmers of New Zealand (Inc) - Northland Province	SUB-P2	Support	<b>RETAIN</b> SUB-P2 as notified. OR Wording that achieves a similar intent. AND Any consequential amendments.	<ul style="list-style-type: none"> <li>The submitter supports SUB-P2 as notified.</li> </ul>
217.55	Cato Bolam Consultants Limited	SUB-P2	Support	<b>AMEND</b> SUB-P2.4 as follows: Requiring allotments to connect to the Council's reticulated systems where practicable, except in the General rural zone <u>and the Rural lifestyle zone.</u>	<ul style="list-style-type: none"> <li>The submitter has requested this amendment as SUB-P2.4 should also include an exception for the Rural lifestyle zone, as it is inappropriate to require rural subdivision to connect to Council's reticulated systems.</li> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> </ul>
257.16	Piroa Conservation Trust	SUB-P2	Support	<b>RETAIN</b> SUB-P2.	<ul style="list-style-type: none"> <li>These requirements are supported as it is essential that appropriate infrastructure is in place, or provided for, to cope with any future development proposed.</li> </ul>
272.17	J & C Hawley	SUB-P2	Support	<b>RETAIN</b> SUB-P2 as notified.	<ul style="list-style-type: none"> <li>It is essential that appropriate infrastructure is in place or is provided for to cope with any future development.</li> </ul>
278.16	Marunui Conservation Ltd	SUB-P2	Support	<b>RETAIN</b> SUB-P2.	<ul style="list-style-type: none"> <li>It is essential that appropriate infrastructure is in place or is provided for to cope with any future development.</li> </ul>
283.167	Northpower Limited and Northpower Fibre Limited	SUB-P2	Support	<b>RETAIN</b> SUB-P2 as notified.	<ul style="list-style-type: none"> <li>The submitter supports this policy.</li> </ul>
308.46	Fire and Emergency New Zealand	SUB-P2	Support	<b>RETAIN</b> SUB-P2 as notified.	<ul style="list-style-type: none"> <li>The submitter strongly supports SUB-P2. It is understood that this policy would apply to all zones in the district, including the subdivision in the Rural lifestyle zone and subdivision in the General rural zone of which SUB-P2.1. to SUB-P2.6. will apply. The Requirements set out in SUB-P2.1. to SUB-P2.6. will result in well-functioning communities and will enable the submitter to meet its objectives and undertake</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
					their main and additional functions under the Fire and Emergency Act 2017.
315.40	Horizon Surveying & Land Development	SUB-P2	Support	<b>RETAIN</b> SUB-P2.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
330.75	New Zealand Transport Agency	SUB-P2	Support	<b>RETAIN</b> SUB-P2 as notified.	<ul style="list-style-type: none"> <li>Policy is supported as it emphasises the importance of integration and co-ordination of infrastructure and subdivision, and the efficient development and integration of infrastructure including with staging as needed.</li> </ul>
149.73	Royal Forest and Bird Protection Society of New Zealand Incorporated	SUB-P3	Amend	<b>AMEND</b> SUB-P3.1 as follows: Provide for recreation, <u>open spaces</u> and public access by: 1. <del>Encouraging</del> <b>Requiring</b> the provision of public open and <u>natural</u> spaces, that provide for various forms of recreation, within residential zones; and AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> <li>The National Policy Statement for Urban Development requires access to natural open spaces as part of delivering well-functioning urban environments. The submitter considers this should be included SUB-P3.1. and that it should be required rather than encouraged, as per the National Policy Statement for Urban Development.</li> </ul>
212.22	BA & JK Paton Ltd	SUB-P3	Amend	No specific decision was requested; however, the submission supports in part SUB-P3 and commented that it is not just to require provision of public open space where the Council is not interested in accepting such land to vest in Council. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
255.6	P McDermott	SUB-P3	Amend	<b>ADD</b> new clause to SUB-P3 as follows: Provide for recreation and public access by: 2. Encouraging the provision of public open spaces, that provide for various forms of recreation, within residential zones; and 3. Requiring the location, number, and size of open spaces to be proportionate to the anticipated future density of the neighbourhood. 4. <u>Allow for and encourage provision of large-scale flood detention or holding areas as recreational areas.</u>	<ul style="list-style-type: none"> <li>To better manage the risk of natural hazards, particularly flooding.</li> </ul>
282.24	Murphy Property Development Limited	SUB-P3	Amend	<b>AMEND</b> SUB-P3 as follows: Provide for recreation and public access by: 1. Encouraging the provision of public open spaces, that provide for various forms of recreation, within <del>residential</del> urban zones; and 2. Requiring the location, number, and size of open spaces to be proportionate to the anticipated future density of the neighbourhood. AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>The policy as drafted is limited to residential zones. The Proposed District Plan proposes a single residential zone, and recreation spaces are more commonly provided and used within commercial spaces.</li> </ul>
331.12	Northland Holdings 2016 Limited	SUB-P3	Amend	<b>AMEND</b> SUB-P3.1. as follows: 1. Encouraging the provision of public open spaces, that provide for various forms of recreation, within <del>residential</del> <u>urban</u> zones; and AND Any further necessary consequential amendments required to achieve the relief sought.	<ul style="list-style-type: none"> <li>Generally supports SUB-P3 but notes the policy is limited to residential zones where only one residential zone is proposed.</li> <li>Recreation spaces are more commonly provided and used within commercial areas.</li> </ul>
217.56	Cato Bolam Consultants Limited	SUB-P3	Support	<b>RETAIN</b> SUB-P3. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>It is not just to require provision of public open space where the Council is not interested in accepting such land to vest to Council.</li> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> </ul>
217.57	Cato Bolam Consultants Limited	SUB-P4	Support	<b>RETAIN</b> SUB-P4. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> </ul>
253.15	McRobbie Dowling Limited	SUB-P4	Support	<b>RETAIN</b> SUB-P8.	<ul style="list-style-type: none"> <li>Supports the policy direction for subdivision in the general rural zone which avoids reverse sensitivity effects on primary production activities and other</li> </ul>



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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
					activities that have a functional or operational need for a rural location.
315.132	Horizon Surveying & Land Development	SUB-P4	Support	<b>RETAIN</b> SUB-P4.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
315.133	Horizon Surveying & Land Development	SUB-P4	Support	<b>RETAIN</b> SUB-P4.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
212.23	BA & JK Paton Ltd	SUB-P5	Amend	<p><b>ADD</b> a definition or assessment criteria for “impractical,” including topography, cultural constraints, ecological sensitivity, or existing access provisions in the context of SUB-P5.</p> <p>AND</p> <p><b>AMEND</b> SUB-P5 to only apply post-subdivision or with compensation mechanisms.</p> <p>AND</p> <p>No specific decision requested; however, the submission commented that SUB-P5.1.b. does not provide incentives for allotments of 4ha or more to provide public access to these areas.</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"> <li>SUB-P5.1.(b)(1) “Impractical” is not defined, potentially leading to inconsistent or overly discretionary application by the Council.</li> <li>The plan proposes mandatory setbacks from waterbodies to preserve future esplanade strips prior to subdivision.</li> <li>Land use and development is limited, without compensation or subdivision taking place. Could affect existing use rights and land value.</li> </ul>
217.58	Cato Bolam Consultants Limited	SUB-P5	Oppose	<p><b>ADD</b> a definition or assessment criteria for 'impractical', including topography, cultural constraints, ecological, or existing access provisions. This request is in the context of SUB-P5.1.b.1.</p> <p>AND</p> <p><b>AMEND</b> SUB-P5 to ensure this policy only applies post-subdivision, or with compensation mechanisms.</p> <p>AND</p> <p>No specific decision requested; however the submission considers that SUB-P5.1.b. does not provide an incentive for allotments of 4ha or more to provide public access to these areas.</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"> <li>SUB-P5.1.b. No incentive is currently provided for allotments of 4ha or more to provide public access to these areas.</li> <li>SUB-P5.1.b.1 “Impractical” is not defined, potentially leading to inconsistent or overly discretionary application by the Council. The plan proposes mandatory setbacks from waterbodies to preserve future esplanade strips, even before subdivision occurs. This limits land use and development without compensation or subdivision taking place and could affect existing use rights and land value.</li> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> </ul>
304.98	Director General of Conservation	SUB-P5	Oppose	<p><b>DELETE</b> the exception criteria from SUB-P5.</p> <p>AND</p> <p>Any further or alternative relief to like effect to that sought.</p>	<ul style="list-style-type: none"> <li>The submitter does not consider SUB-P5 aligns with Sections 229 – 237 of the Resource Management Act as it outlines immeasurable actions to decide where the creation of esplanade reserves are required.</li> </ul>
315.134	Horizon Surveying & Land Development	SUB-P5	Support	<b>RETAIN</b> SUB-P5.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
349.13	WS & R Smellie and McConaughy Family Trusts	SUB-P5	Support	<b>RETAIN</b> SUB-P5, particularly the emphasis on 'practical access'.	<ul style="list-style-type: none"> <li>An Esplanade Priority Area is identified around the submitter's property. Submitter supports the principle of public access around the coast but notes that the land at this location is quite steep and may not lend itself to public access in all forms. Therefore the emphasis on 'practical access' is supported.</li> </ul>
290.3	Te Whai Bay Wines	SUB-P6	Amend	<b>DELETE</b> reference to the Mangawhai/Hakaru Managed Growth Area from SUB-P6.	<ul style="list-style-type: none"> <li>Mangawhai/Hakaru Managed Growth Area overlay is not needed. Growth can be managed by other provisions.</li> </ul>
50.5	Evolve Planning and Landscape Architecture	SUB-P6	Oppose	<p><b>DELETE</b> SUB-P6.</p> <p>AND</p> <p>Any consequential amendments.</p>	<ul style="list-style-type: none"> <li>It is inconsistent with Part II of the Resource Management Act, especially Section 5 - sustainable management of natural and physical resources and section 7(b) efficient use and development of natural and physical resources.</li> <li>It does not appropriately give effect to national direction of the National Policy Statement for Urban Development (NPS-UD) and the Northland Regional Policy Statement.</li> <li>It is inconsistent with the Councils Long Term Plan It essentially restricts infill residential development and directs this to large land holdings which have been subject to recent private plan changes.</li> <li>The area is not rural in nature and has very limited rural character.</li> </ul>

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### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
					<ul style="list-style-type: none"> <li>There is no sound justification or planning rationale behind this Overlay.</li> </ul>
151.6	Mangawhai Bush Estate	SUB-P6	Oppose	<b>DELETE</b> SUB-P6.	<ul style="list-style-type: none"> <li>The Managed Growth Overlay is inconsistent with Part II of the Resource Management Act, section 7b) efficient use and development of natural and physical resources.</li> <li>The Managed Growth Overlay and Mapping Extent does not appropriately give effect to national direction of the National Policy Statement for Urban Development and the Northland Regional Policy Statement.</li> <li>The Proposed District Plan does not meet the requirements of the Northland Regional Policy Statement where key points of the Northland Regional Policy Statement with respect to urban form and development, are covered.</li> <li>The Overlay is inconsistent with the Councils Long Term Plan.</li> <li>The Managed Growth Overlay which essentially restricts infill residential development and directs this to large land holdings which have been subject to recent private plan changes.</li> <li>The surrounding environment is not rural in nature and has very limited rural character, the Hakaru / Mangawhai catchment is rural lifestyle / rural residential in nature.</li> </ul>
231.31	S Cullen	SUB-P6	Oppose	<b>DELETE</b> SUB-P6 and replace with new policies which reflect appropriate subdivision within each urban zone including within Light and Heavy industrial zones. AND <b>ADD</b> new policies which reflect appropriate subdivision within each urban zone including within Light and Heavy industrial zones. AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>The submitter does not support the limitation of development based upon the proposed Mangawhai/Hakaru Managed Growth Area. This is an arbitrary area with no s32 justification. Limitation of subdivision with the General rural zone is not efficient, not effective.</li> </ul>
256.18	P Ryan	SUB-P6	Oppose	<b>DELETE</b> SUB-P6 AND <b>ADD</b> new policies that reflect appropriate subdivision within each urban zone. AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>Limitation of development based on the Mangawhai/Hakaru Managed Growth Area is not supported by the submitter.</li> <li>Limitation of subdivision within the General residential zone is not efficient or effective.</li> </ul>
282.25	Murphy Property Development Limited	SUB-P6	Oppose	<b>DELETE</b> SUB-P6. AND <b>ADD</b> new policies which reflect appropriate subdivision within each urban zone. AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>Submitter does not support the limitation of development in the proposed Mangawhai/Hakaru Managed Growth Area. This is an arbitrary area with no s32 justification. Limitation of subdivision with the General residential zone is not efficient and not effective.</li> </ul>
293.26	Vermont Street Partners Limited	SUB-P6	Oppose	<b>DELETE</b> SUB-P6 and replace with new policies which reflect appropriate subdivision within each urban zone (note possible referencing error in submission). AND Any further necessary consequential amendments.	<ul style="list-style-type: none"> <li>The limitation of development based upon the proposed Mangawhai/Hakaru Managed Growth Area is not supported. This is an arbitrary area with no s32 justification.</li> </ul>
331.13	Northland Holdings 2016 Limited	SUB-P6	Oppose	<b>DELETE</b> SUB-P6. AND <b>ADD</b> new policies to replace SUB-P6 which reflect appropriate subdivision within each urban zone. AND Any further necessary consequential amendments required to achieve the relief sought.	<ul style="list-style-type: none"> <li>Limiting development based upon the proposed Mangawhai/Hakaru Managed Growth Area is opposed. The area is arbitrary and without s32 justification. The submitter considers that limiting subdivision within the General residential zone is neither efficient nor effective.</li> </ul>
315.135	Horizon Surveying & Land Development	SUB-P6	Support	<b>RETAIN</b> SUB-P6.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
245.20	C & R Williamson	SUB-P7		<b>AMEND</b> SUB-P7 as follows: Provide for subdivision that enables appropriate land use activities to occur in the Rural lifestyle zone by: 2. <del>Maintaining</del> <b>Requiring subdivision to meet the</b> minimum lot sizes and suitable dimensions for lots to achieve the	<ul style="list-style-type: none"> <li>Clause 3 of SUB-P7 seeks to avoid the creation of undersized lots to ensure that the outcomes of the zone are not undermined. It is considered that this policy as worded is not efficient and effective.</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<p>character, amenity values and density anticipated in the Rural lifestyle zone;</p> <p>3. Avoiding subdivision around minor residential units; and</p> <p>4. Avoiding the creation of undersized lots in the Rural lifestyle zone to ensure the function and desired outcomes for the zone are not undermined an urban form and uniform development patterns.</p> <p>AND</p> <p>Any further necessary consequential amendments required.</p>	
256.19	P Ryan	SUB-P7	Amend	<p><b>AMEND</b> SUB-P7 as follows:</p> <p>Provide for subdivision that enables appropriate land use activities to occur in the Rural lifestyle zone by:</p> <p>1. <del>Maintaining</del> Requiring subdivision to meet the minimum lot sizes and suitable dimensions for lots to achieve the character, amenity values and density anticipated in the Rural lifestyle zone;</p> <p>2. Avoiding subdivision around minor residential units; and</p> <p>3. Avoiding the creation of undersized lots in the Rural lifestyle zone to ensure the function and desired outcomes for the zone are not undermined an urban form and uniform development patterns.</p> <p>AND</p> <p>Any necessary consequential amendments.</p>	<ul style="list-style-type: none"> <li>As proposed, the policy is not efficient and effective.</li> </ul>
282.26	Murphy Property Development Limited	SUB-P7	Amend	<p><b>AMEND</b> SUB-P7 as follows:</p> <p>Provide for subdivision that enables appropriate land use activities to occur in the Rural lifestyle zone by:</p> <p>1. <del>Maintaining</del> Requiring subdivision to meet the minimum lot sizes and suitable dimensions for lots to achieve the character, amenity values and density anticipated in the Rural lifestyle zone;</p> <p>2. Avoiding subdivision around minor residential units; and</p> <p>3. Avoiding the creation of undersized lots in the Rural lifestyle zone to ensure the function and desired outcomes for the zone are not undermined an urban form and uniform development patterns.</p> <p>AND</p> <p>Any necessary consequential amendments.</p>	<ul style="list-style-type: none"> <li>It is considered that this policy as worded is not efficient and effective.</li> </ul>
293.25	Vermont Street Partners Limited	SUB-P7	Amend	<p><b>AMEND</b> SUB-P7 as follows:</p> <p>Provide for subdivision that enables appropriate land use activities to occur in the Rural lifestyle zone by:</p> <p>1. <del>Maintaining</del> Requiring subdivision to meet the minimum lot sizes and suitable dimensions for lots to achieve the character, amenity values and density anticipated in the Rural lifestyle zone; and</p> <p>2. Avoiding subdivision around minor residential units; and</p> <p>3. <del>Avoiding the creation of undersized lots in the Rural lifestyle zone to ensure the function and desired outcomes for the zone are not undermined.</del></p> <p>AND</p> <p>Any further necessary consequential amendments.</p>	<ul style="list-style-type: none"> <li>It is considered that this policy as worded is not efficient and effective and should be amended as sought.</li> </ul>
315.41	Horizon Surveying & Land Development	SUB-P7	Amend	<p><b>AMEND</b> SUB-P7 to include specific provisions for the protection and enhancement of landscapes, ecological features, and rural character.</p> <p>OR</p> <p><b>ADD</b> a new policy that includes specific provisions for the protection and enhancement of landscapes, ecological features, and rural character.</p>	<ul style="list-style-type: none"> <li>SUB-P7 lacks clear reference to the protection and enhancement of natural features and landscapes, which are essential for maintaining rural character.</li> </ul>
331.14	Northland Holdings 2016 Limited	SUB-P7	Amend	<p><b>AMEND</b> SUB-P7 as follows:</p> <p>Provide for subdivision that enables appropriate land use activities to occur in the Rural lifestyle zone by:</p> <p>1. <del>Maintaining</del> Requiring subdivision to meet the minimum lot sizes and suitable dimensions for lots to achieve the character, amenity values and density anticipated in the Rural lifestyle zone;</p> <p>2. Avoiding subdivision around minor residential units; and</p> <p>3. Avoiding the creation of undersized lots in the Rural lifestyle zone to ensure the function and desired outcomes for the zone are not undermined an urban form and uniform development patterns.</p>	<ul style="list-style-type: none"> <li>The submitter considers that the wording of SUB-P7 is neither efficient nor effective.</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				AND Any further necessary consequential amendments required to achieve the relief sought.	
213.7	Blue Sky Land Company Ltd	SUB-P7	Oppose	<b>DELETE</b> SUB-P7.3. OR Alternative relief with similar effect.	<ul style="list-style-type: none"> <li>The policy uses the term 'avoid' which caselaw has established to require complete avoidance with no flexibility.</li> <li>With regard to Rural lifestyle zone, it is conceivable that some new sites may be slightly outside of the 4,000m<sup>2</sup> where justified, but SUB-P7(3) could prevent this.</li> </ul>
212.24	BA & JK Paton Ltd	SUB-P7	Support	<b>RETAIN</b> SUB-P7. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
217.60	Cato Bolam Consultants Limited	SUB-P7	Support	<b>EVALUATE</b> the Rural lifestyle rules to confirm that they meet SUB-P7.1 and SUB-P7.3, AND <b>ADD</b> yield incentives to use transferrable title rights obtained from the General rural zone. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has requested the above resolutions because achieving SDUB-P7.1 depends on the subsequent subdivision rules and the context in the areas proposed for a Rural lifestyle zone.</li> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> </ul>
50.7	Evolve Planning and Landscape Architecture	SUB-P8	Amend	<b>AMEND</b> SUB-P8 as a result of deleting the Mangawhai/Hakaru Managed Growth Area. AND Any consequential amendments.	<ul style="list-style-type: none"> <li>It is inconsistent with Part II of the Resource Management Act, especially Section 5 - sustainable management of natural and physical resources and section 7(b) efficient use and development of natural and physical resources.</li> <li>It does not appropriately give effect to national direction of the National Policy Statement for Urban Development (NPS-UD) and the Northland Regional Policy Statement.</li> <li>It is inconsistent with the Councils Long Term Plan It essentially restricts infill residential development and directs this to large land holdings which have been subject to recent private plan changes.</li> <li>The area is not rural in nature and has very limited rural character.</li> <li>There is no sound justification or planning rationale behind this Overlay.</li> </ul>
140.58	Horticulture New Zealand	SUB-P8	Amend	<b>DELETE</b> SUB-P8(5) AND Any consequential or alternative amendments required to address the concerns raised by the submitter.	<ul style="list-style-type: none"> <li>Smaller rural lifestyle lots being provided for within the General rural zone does not meet the zone's purpose.</li> </ul>
149.74	Royal Forest and Bird Protection Society of New Zealand Incorporated	SUB-P8	Amend	<b>ADD</b> the following clause to SUB-P8 as follows: <u>Protects areas of significant indigenous vegetation and the habitats of significant indigenous fauna, provides for ecological corridors to maintain and enhance indigenous biodiversity.</u> AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> <li>The Rural zone contains remnants of indigenous biodiversity. As such, SUB-P8 should provide direction on its protection, maintenance and enhancement through subdivision.</li> </ul>
151.8	Mangawhai Bush Estate	SUB-P8	Amend	<b>AMEND</b> SUB-P8 as a consequence of deleting the Mangawhai/Hakaru Growth Management Area.	<ul style="list-style-type: none"> <li>The Managed Growth Overlay is inconsistent with Part II of the Resource Management Act, section 7b) efficient use and development of natural and physical resources.</li> <li>The Managed Growth Overlay and Mapping Extent does not appropriately give effect to national direction of the National Policy Statement for Urban Development and the Northland Regional Policy Statement.</li> <li>The Proposed District Plan does not meet the requirements of the Northland Regional Policy Statement where key points of the Northland Regional Policy Statement with respect to urban form and development, are covered.</li> <li>The Overlay is inconsistent with the Councils Long Term Plan.</li> <li>The Managed Growth Overlay which essentially restricts infill residential development and directs this</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
					to large land holdings which have been subject to recent private plan changes. <ul style="list-style-type: none"> <li>The surrounding environment is not rural in nature and has very limited rural character, the Mangawhai/Hakaru catchment is rural lifestyle / rural residential in nature.</li> </ul>
213.8	Blue Sky Land Company Ltd	SUB-P8	Amend	<b>AMEND</b> SUB-P8.2 as follows: 2. Avoids, <u>remedies or mitigates</u> reverse sensitivity effects on primary production activities to the greatest extent practicable. OR Alternative relief with similar effect.	<ul style="list-style-type: none"> <li>Absolute avoidance of reverse sensitivity effects is difficult in some instances given the enabling provisions in the GRUZ.</li> </ul>
249.7	Khans Developments and Investments Limited	SUB-P8	Amend	<b>AMEND</b> SUB-P8.2 as follows: 2. Avoids, <u>remedies or mitigates</u> reverse sensitivity effects on primary production activities to the greatest extent practicable. OR Alternative relief with similar effect.	<ul style="list-style-type: none"> <li>Absolute avoidance of reverse sensitivity effects is difficult in some instances given the enabling provisions in the General rural zone.</li> </ul>
304.99	Director General of Conservation	SUB-P8	Amend	<b>ADD</b> an additional clause to SUB-P8 as follows: <u>8. The management of Kauri Dieback disease</u> AND Any further or alternative relief to like effect to that sought.	<ul style="list-style-type: none"> <li>SUB-P8 should include provision for the management of Kauri Dieback.</li> </ul>
310.30	Fonterra Limited	SUB-P8	Amend	<b>AMEND</b> SUB-P8.2. as follows: Ensure subdivision in the General rural zone outside the Mangawhai/Hakaru Managed Growth Area: 1. Avoids the fragmentation of highly productive land unless the productive capacity of that land is maintained or enhanced; 2. Avoids reverse sensitivity effects on primary production activities ( <u>including associated manufacturing and processing activities</u> ); Supports a range of primary production activities and other activities that have a functional or operational need for a rural location; 3. Maintains rural character and amenity values; 4. Enables smaller rural lifestyle lots where appropriate and consistent with the requirements for different types of subdivisions in this chapter; 5. Avoids subdivision of minor residential unit; and 6. Is well integrated with the existing transport network infrastructure.	<ul style="list-style-type: none"> <li>Consistent with the Operative District Plan, Fonterra is seeking a site-specific rule requiring a discretionary activity subdivision consent for any subdivision within the Maungatūroto Dairy Factory Noise Sensitive Area to avoid potential reverse sensitivity effects, so seeks some appropriate amendments to objective SUB-P8 to reflect this.</li> </ul>
217.61	Cato Bolam Consultants Limited	SUB-P8	Oppose	<b>AMEND</b> the zone area identified in the Mangawhai Spatial Plan (Figure 3-4-5 'Preferred Growth Option') from the General rural zone to Rural lifestyle zone. AND <b>AMEND</b> zone boundaries and include provisions to incentive transferable title rights to the Rural lifestyle zone, or where ecological benefit of a specified benchmark is achieved. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> <li>To achieve SUB-P8.1-4, and 6-7, general rural zone areas should encourage subdivision in smaller lifestyle Lots by means of transferrable rights to the rural lifestyle zone, or where there is no LUC 1 or LUC 2 soils, or where ecological benefit is achieved.</li> <li>It is unclear what constitutes 'well-integrated' with the existing transport network, as outlined in SUB-P7.</li> </ul>
256.20	P Ryan	SUB-P8	Oppose	<b>DELETE</b> SUB-P8. AND <b>ADD</b> new policies that reflect appropriate subdivision within each urban zone. AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>Limitation of development based upon the Mangawhai/Hakaru Managed Growth Area is opposed.</li> </ul>
282.27	Murphy Property Development Limited	SUB-P8	Oppose	<b>DELETE</b> SUB-P8 AND <b>ADD</b> new policies which reflect appropriate subdivision within each urban zone. AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>Submitter does not support the limitation of development in the proposed Mangawhai/Hakaru Managed Growth Area. This is an arbitrary area with no s32 justification. Limitation of subdivision with the General residential zone is not efficient nor effective.</li> </ul>
331.15	Northland Holdings 2016 Limited	SUB-P8	Oppose	<b>DELETE</b> SUB-P8. AND <b>ADD</b> new policies to replace SUB-P8 (note referencing error in submission) which reflect appropriate subdivision within each urban zone.	<ul style="list-style-type: none"> <li>Limiting development based upon the proposed Mangawhai/Hakaru Managed Growth Area is opposed. The area is arbitrary and without s32 justification. The submitter considers that limiting</li> </ul>

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### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				AND Any further necessary consequential amendments required to achieve the relief sought.	subdivision within the General residential zone is neither efficient nor effective.
136.93	Federated Farmers of New Zealand (Inc) - Northland Province	SUB-P8	Support	<b>AMEND</b> SUB-P8 as follows: <del>Ensure</del> <u>Provide for</u> subdivision in the General rural zone outside the Mangawhai/Hakaru Managed Growth Area by: 1. <del>Avoids</del> <u>ing</u> the fragmentation of highly productive land unless the productive capacity of that land is maintained or enhanced; 2. <del>Avoids</del> <u>ing</u> reverse sensitivity effects on primary production <del>activities consistent with GRUZ-P3;</del> 3. <del>Supports a</del> <u>Enabling a</u> range of primary production activities and other activities that have a functional or operational need for a rural location <u>consistent with GRUZ-P1;</u> 4. <del>Maintains</del> <u>ing</u> rural character and amenity values <u>consistent with GRUZ-P4;</u> 5. <del>Enables</del> <u>ing</u> smaller rural lifestyle lots only where appropriate and consistent with the requirements for different types of subdivisions in this chapter <u>and with GRUZ-P5;</u> 6. <del>Avoids</del> <u>ing</u> subdivision of minor residential unit; and 7. <del>is well integrated</del> <u>Considering integration</u> with the existing transport network infrastructure.  OR Wording that achieves a similar intent: AND Any consequential amendments.	<ul style="list-style-type: none"> <li>The submitter supports in part the inclusion of policy SUB-P8. The policy would benefit from minor redrafting to ensure it functions as a policy rather than reading like an objective and suggest amendments to improve alignment with General rural zone policies.</li> </ul>
315.136	Horizon Surveying & Land Development	SUB-P8	Support	<b>RETAIN</b> SUB-P8.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
315.42	Horizon Surveying & Land Development	SUB-P11	Amend	<b>CONSOLIDATE</b> SUB-P11 into the general subdivision policies as they duplicate broader subdivision matters.	<ul style="list-style-type: none"> <li>Consolidating the contents of SUB-P11 into the general subdivision framework will avoid repetition and improve clarity.</li> </ul>
315.44	Horizon Surveying & Land Development	SUB-P11	Amend	<b>AMEND</b> SUB-P11 to revise the references to Mangawhai Design Guidelines. OR <b>ADD</b> an updated version of the Mangawhai Design Guidelines to the Proposed District Plan so that the reference to the Guidelines in SUB-P11 is correct. OR <b>AMEND</b> SUB-P11 to replace the reference to the Mangawhai Design Guidelines with more specific assessment matters that relate to rural character and amenity within the plan provisions.	<ul style="list-style-type: none"> <li>The Mangawhai Design Guidelines are not included in the Proposed District Plan and are outdated. This creates uncertainty for applicants and decision-makers.</li> </ul>
217.62	Cato Bolam Consultants Limited	SUB-P11	Support	<b>RETAIN</b> SUB-P11. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> </ul>
128.1	Loralie Sheppard	SUB-P12	Amend	<b>AMEND</b> SUB-P12 and subdivision framework for Mangawhai/Hakaru Managed Growth Area to ensure rural properties are considered for subdivision on their merits. See submission for suggested area for Rural lifestyle zoning.	<ul style="list-style-type: none"> <li>A Rural lifestyle zone in the Mangawhai/Hakaru Managed Growth Area would support on-site wastewater and stormwater disposal so would not place demand on council infrastructure.</li> <li>A Rural lifestyle zone would align with the existing development.</li> </ul>
291.2	Tovolea Farm Ltd	SUB-P12	Amend	<b>AMEND</b> SUB-P12 to recognise clustered lifestyle rural lifestyle subdivision that retains productive capacity. AND any other relief that is consistent with and/or consequential to this submission.	<ul style="list-style-type: none"> <li>Infrastructure efficiency - Kaiwaka Mangawhai Road and Lawrence Road that bound the submitter's land are already sealed and in good conditions and infrastructure can readily be upgraded in this location.</li> <li>Creating small lots from large sites would not lose productivity or lose rural character.</li> <li>The rezoning will still give effect to the National Policy Statement for Highly Productive Land and the Northland Regional Policy Statement.</li> <li>The rezoning will enable the submitter to provide for their economic and social wellbeing by providing reasonable subdivision pathways.</li> <li>The Mangawhai/Hakaru Managed Growth Area is a blunt tool with weak justification.</li> </ul>



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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
321.2	K Paler & M Paler-Jansen	SUB-P12	Amend	<b>AMEND</b> SUB-P12 to recognise the different infrastructure requirements of Urban and General/Rural lifestyle subdivisions.	<ul style="list-style-type: none"> <li>In the General rural and Rural lifestyle zones infrastructure constraints do not exist and they are provided on-site by property owners.</li> </ul>
7.2	David Medland-Slater	SUB-P12	Oppose	<b>AMEND</b> plan to include far more and reasonable detail on what could allowed rather than an almost blanket ban on subdivisions in this new area.	<ul style="list-style-type: none"> <li>The apparent blanket ban on subdivision within the Mangawhai/Hakaru Managed Growth Area is unreasonable and no other areas have such restrictions. Council have only listed insufficient infrastructure as being the reason for this decision but planning for infrastructure is within the Council's remit. Specific policy reasoning behind preventing growth within the Mangawhai/Hakaru Area would be helpful, rather than just the sparse explanation proposed.</li> <li>If Council have concerns regarding the availability of infrastructure, these concerns should be made clear and solutions provided within the District Plan.</li> <li>E.g., Subdivisions being required to provide water and septic systems to alleviate pressure on Council systems.</li> </ul>
50.6	Evolve Planning and Landscape Architecture	SUB-P12	Oppose	<b>DELETE</b> SUB-P12. AND Any consequential amendments.	<ul style="list-style-type: none"> <li>It is inconsistent with Part II of the Resource Management Act, especially Section 5 - sustainable management of natural and physical resources and section 7(b) efficient use and development of natural and physical resources.</li> <li>It does not appropriately give effect to national direction of the National Policy Statement for Urban Development (NPS-UD) and the Northland Regional Policy Statement.</li> <li>It is inconsistent with the Councils Long Term Plan It essentially restricts infill residential development and directs this to large land holdings which have been subject to recent private plan changes.</li> <li>The area is not rural in nature and has very limited rural character.</li> <li>There is no sound justification or planning rationale behind this Overlay.</li> </ul>
77.11	Richard (Rick) Ruiterman	SUB-P12	Oppose	No specific decision sought however the submission refers to SUB-P12 and does not support the limitation of development based upon the proposed Mangawhai/Hakaru Managed Growth Area.	<ul style="list-style-type: none"> <li>The application of the managed growth zone around the Mangawhai region is a very broad-brush approach to managing infrastructure and it appears to be inconsistently applied.</li> <li>Bayliss beach has been marked for residential expansion yet has limited public sewer available (KDC GIS Assets). Whereas, Mangawhai has an extensive existing wastewater scheme and is marked for Managed growth.</li> <li>The Managed Growth Area is proposed to manage growth to align with infrastructure development. However, this has been applied to the rural zone surrounding Mangawhai despite rural lots being self-contained with sanitary sewer, stormwater and potable water on-site.</li> </ul>
151.7	Mangawhai Bush Estate	SUB-P12	Oppose	<b>DELETE</b> SUB-P12.	<ul style="list-style-type: none"> <li>The Managed Growth Overlay is inconsistent with Part II of the Resource Management Act, section 7b) efficient use and development of natural and physical resources.</li> <li>The Managed Growth Overlay and Mapping Extent does not appropriately give effect to national direction of the National Policy Statement for Urban Development and the Northland Regional Policy Statement.</li> <li>The Proposed District Plan does not meet the requirements of the Northland Regional Policy Statement where key points of the Northland Regional Policy Statement with respect to urban form and development, are covered.</li> <li>The Overlay is inconsistent with the Councils Long Term Plan.</li> <li>The Managed Growth Overlay which essentially restricts infill residential development and directs this to large land holdings which have been subject to recent private plan changes.</li> <li>The surrounding environment is not rural in nature and has very limited rural character, the Hakaru /</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
					Mangawhai catchment is rural lifestyle / rural residential in nature.
217.63	Cato Bolam Consultants Limited	SUB-P12	Oppose	<b>AMEND</b> the extent of the Mangawhai/Hakaru Managed Growth Area to be decreased to match the operative Harbour Overlay and Mangawhai Spatial Plan (figure 3-4-5 'Preferred Growth Option'). AND <b>PROVIDE</b> other measures/mechanisms to ensure consolidated infrastructure, including transportation and social infrastructure is provided to suitable manage future growth. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> <li>The areas inside the Mangawhai/Hakaru Managed Growth Area are not appropriately considered.</li> <li>The policy does not take into account other measures/mechanisms that can ensure consolidated infrastructure, including transportation and social infrastructure, is provided to sustainable manage future growth.</li> </ul>
231.32	S Cullen	SUB-P12	Oppose	<b>DELETE</b> SUB-P12. AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>Submitter does not support the limitation of development based upon the proposed Mangawhai/Hakaru Managed Growth Area. This is an arbitrary area with no s32 justification. Limitation of subdivision with this area is not efficient, not effective. Furthermore, proposed policy SUB-P2 subject to appropriate amendments will manage provision of infrastructure.</li> </ul>
256.21	P Ryan	SUB-P12	Oppose	<b>DELETE</b> SUB-P12 AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>Limitation of development based upon the proposed Mangawhai/Hakaru Managed Growth Area is not supported.</li> <li>SUB-P2 subject to appropriate amendments will manage provision of infrastructure.</li> </ul>
280.5	Moir Point Park Developments	SUB-P12	Oppose	<b>DELETE</b> SUB-P12	<ul style="list-style-type: none"> <li>The submitter has requested the above relief for the following reasons:</li> <li>The policy restricts growth in the Mangawhai area completely, including within the residential zone.</li> <li>With the limitations to growth, the policy as written will not achieve the intended outcome and will hinder infrastructure coming forward without the anticipated population attached to it - Contradicting the Proposed District Plan.</li> </ul>
282.10	Murphy Property Development Limited	SUB-P12	Oppose	<b>DELETE</b> SUB-P12. AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>Submission does not support the limitation of development based upon the proposed Mangawhai/Hakaru Managed Growth Area. this is an arbitrary area with no s32 justification. Limitation of subdivision with this area is not efficient not effective. Furthermore, proposed policy SUB-P2 subject to appropriate amendments will manage provision of infrastructure.</li> </ul>
285.13	S & R Brunt	SUB-P12	Oppose	<b>AMEND</b> the Mangawhai/Hakaru Managed Growth Area overlay to exclude the area between Garbolino Road and Tara Road or deleted altogether. AND <b>ADD</b> other measures/mechanisms to ensure consolidated infrastructure, including transportation and social infrastructure is provided to sustainably manage future growth. AND Any other relief that is consistent with and/or consequential to this submission.	<ul style="list-style-type: none"> <li>The areas inside the Mangawhai/Hakaru Managed Growth Area are not all appropriately considered.</li> <li>This policy does not take into account other measures/mechanisms that can ensure consolidated infrastructure is provided to sustainably manage future growth.</li> </ul>
290.2	Te Whai Bay Wines	SUB-P12	Oppose	<b>DELETE</b> SUB-P12.	<ul style="list-style-type: none"> <li>Mangawhai/Hakaru Managed Growth Area overlay is not needed. Growth can be managed by other provisions.</li> </ul>
291.14	Tovolea Farm Ltd	SUB-P12	Oppose	<b>AMEND</b> the Proposed District Plan so that the area inside the Mangawhai/Hakaru Managed Growth Area overlay is decreased to exclude the submitter's land or deleted altogether. AND <b>ADD</b> other measures/mechanisms to ensure consolidated infrastructure, including transportation and social infrastructure is provided to sustainably manage growth. AND Any other relief that is consistent with and/or consequential to this submission.	<ul style="list-style-type: none"> <li>The areas inside the Mangawhai/Hakaru Managed Growth Area are not all appropriately considered.</li> <li>This policy does not take into account other measures/mechanisms that can ensure consolidated infrastructure is provided to sustainably manage future growth.</li> <li>The policy does not recognise the benefits of clustered rural lifestyle subdivision that retains productive capacity.</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
293.27	Vermont Street Partners Limited	SUB-P12	Oppose	<b>DELETE</b> SUB-P12. AND Any further necessary consequential amendments.	<ul style="list-style-type: none"> <li>The limitation of development based upon the proposed Mangawhai/Hakaru Managed Growth Area is not supported.</li> <li>This is an arbitrary areas with no s32 justification.</li> <li>Limitation of subdivision in this area is not efficient or effective.</li> <li>SUB-P2, subject to appropriate amendments, will manage provision of infrastructure.</li> </ul>
315.45	Horizon Surveying & Land Development	SUB-P12	Oppose	<b>DELETE</b> SUB-P12.	<ul style="list-style-type: none"> <li>Submitter opposes the Mangawhai/Hakaru Managed Growth Area.</li> </ul>
331.16	Northland Holdings 2016 Limited	SUB-P12	Oppose	<b>DELETE</b> SUB-P12. AND Any further necessary consequential amendments required to achieve the relief sought.	<ul style="list-style-type: none"> <li>Limiting development within the proposed Mangawhai/Hakaru Managed Growth Area is opposed. The submitter considers the Mangawhai/Hakaru Growth Area to be arbitrary and without s32 justification. Limiting subdivision within the Mangawhai/Hakaru Managed Growth Area is neither efficient nor effective.</li> <li>Moreover, SUB-P2 will manage provision of infrastructure, subject to amendments as requested by the submitter.</li> </ul>
348.9	Thelma and Louise Mangawhai Limited	SUB-P12	Oppose	<b>DELETE</b> SUB-P12 AND <b>AMEND</b> the extent of the Mangawhai/Hakaru Managed Growth Area to apply to a much smaller land area. It should not apply to existing or proposed residential areas.	<ul style="list-style-type: none"> <li>The policy restricts growth in the Mangawhai area completely, including within the residential zone. With such limitations to growth, the policy as written will not achieve the intended outcome and instead hinder infrastructure coming forward in the first place without the anticipated population growth attached to it. This results in a clear contradiction to what a District Plan should achieve.</li> </ul>
362.3	Bruce Nelder of B & C Family Trust and Nelder Farms Ltd	SUB-P12	Oppose	<b>DELETE</b> SUB-P12.	<ul style="list-style-type: none"> <li>Submitter does not support the Mangawhai/Hakaru Managed Growth Area.</li> </ul>
257.17	Piroa Conservation Trust	SUB-P12	Support	<b>RETAIN</b> SUB-P12.	<ul style="list-style-type: none"> <li>Supports the restriction on further subdivision within the identified Mangawhai/Hakaru Managed Growth Area for the reasons given in the chapter.</li> </ul>
272.18	J & C Hawley	SUB-P12	Support	<b>RETAIN</b> SUB-P12 as notified.	<ul style="list-style-type: none"> <li>The policy provides for small-scale opportunities.</li> <li>The submitter fully supports the restriction on further subdivision, including urban infill subdivision, within the identified Mangawhai/Hakaru Managed Growth Area for the reasons given in the Subdivision chapter.</li> </ul>
278.17	Marunui Conservation Ltd	SUB-P12	Support	<b>RETAIN</b> SUB-P12.	<ul style="list-style-type: none"> <li>The policy provides for small-scale opportunities.</li> <li>The submitter fully supports the restriction on further subdivision, including urban infill subdivision, within the identified Mangawhai/Hakaru Managed Growth Area for the reasons given in the Subdivision chapter.</li> </ul>
260.13	The Rise Limited	SUB-P13	Amend	<b>AMEND</b> SUB-P13 to reflect Operative District Plan Policy PREC2-P1. AND Any further necessary consequential amendments required to achieve the relief sought.	<ul style="list-style-type: none"> <li>SUB-P13 does not reflect PREC2-P1 - recently approved via Private Plan Change 83 - and is inconsistent with PREC-2 policies. Moreover, the proposed General residential zone chapter includes policies consistent with PREC2-P1.</li> </ul>
281.12	Moonlight Heights Limited	SUB-P13	Amend	<b>AMEND</b> SUB-P13 to reflect the Operative District Plan policy PREC1-P1. AND Any further necessary consequential amendments required.	<ul style="list-style-type: none"> <li>SUB-P13 does not reflect PREC1-P1 as recently approved through private plan change.</li> <li>Clauses 3, and 4 have been added and are inconsistent with PREC-1 policies.</li> <li>The General residential zone chapter also includes a subdivision policy which is consistent with the Operative District Plan policy PREC1-P1.</li> </ul>
300.33	Bream Tail Residents Association Incorporated	SUB-P13	Amend	<b>AMEND</b> to include the following additional policy requirements in relation to the Cove Road North Precinct: <ol style="list-style-type: none"> <li><u>Protection of indigenous biodiversity of the surrounding locality, including prohibitions within the Precinct on dogs, cats and mustelids.</u></li> <li><u>Avoidance of reverse sensitivity effects on adjoining and nearby primary production activities in rural zones and precincts.</u></li> <li><u>Maintenance and enhancement of rural character, landscape values and amenity values, in recognition</u></li> </ol>	<ul style="list-style-type: none"> <li>Refer to submission for details but the submitter opposes SUB-P13 in so far as it applies to the Cover Road North Precinct.</li> <li>In grouping the policy outcomes for both the Awakino and Cove Road North Precincts into one policy, SUB-P13 fails to properly make proper provision for the specific environment of the Cove Road North Precinct, including its relationship to neighbouring sites, zones and land uses. In particular, the policy is inappropriate as does not provide proper direction in</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<p><u>that the Precinct provides a transition from urban to rural land uses.</u></p> <p>d. <u>Provision of a sensitive transition from the Cove Road North Precinct to the Rural zone (including Bream Tail to the north), recognising the rural landscape values, including by the provision of lower residential densities, setbacks and landscape buffers and screening.</u></p> <p>AND</p> <p>Any consequential amendments or alternative relief to address the matters raised in the submission.</p>	<p>relation to a number of resource management matters (refer to submission for details).</p> <ul style="list-style-type: none"> <li>The submitter considers that the Proposed Plan does not have proper regard to Part 2 of the Resource Management Act and does not give effect to higher order policy documents including the Regional Policy Statement.</li> </ul>
315.43	Horizon Surveying & Land Development	SUB-P13	Amend	<b>CONSOLIDATE</b> SUB-P13 and consolidate the contents into the general subdivision policies as they duplicate broader subdivision matters.	<ul style="list-style-type: none"> <li>Consolidating the contents of SUB-P13 into the general subdivision framework will avoid repetition and improve clarity.</li> </ul>
217.64	Cato Bolam Consultants Limited	SUB-P13	Support	<p><b>AMEND</b> SUB-P13.2. to clarify a mechanism to ensure sufficient infrastructure/servicing to accommodate the development.</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"> <li>The submitter is of the opinion that SUB-P13.2 is a statement, and not a policy which directs, encourages or enables any action.</li> </ul>
					<ul style="list-style-type: none"> <li></li> </ul>
281.13	Moonlight Heights Limited	SUB-PREC1-	Oppose	<p><b>DELETE</b> SUB-PREC1.</p> <p>AND</p> <p><b>AMEND</b> SUB-R3.5 to refer to SUB-S1.5</p> <p>AND</p> <p><b>ADD</b> an exemption to the minimum allotment size standard to be consistent with General residential zone as follows:            "Except that no minimum net site area requirement applies to any allotment created around an existing or proposed residential unit that forms part of a multi-level development for which a resource consent or building consent has been granted (excluding minor residential units)."</p> <p>AND</p> <p>Any further necessary consequential amendments required.</p>	<ul style="list-style-type: none"> <li>The submitter has not detailed <u>why</u> they want the above relief, however they have advised that the proposed district plan enables residential development to a minimum lot size of 400m<sup>2</sup> if reticulated water supply is available which is considered an efficient and effective use of land within this precinct.</li> </ul>
281.16	Moonlight Heights Limited	SUB-PREC1-Awakino Precinct-MAT1	Amend	<p><b>AMEND</b> the heading in row 2, column 1 (under the main heading of SUB-PREC1-Awakino Precinct-MAT1) and rename it as follows:  <del>Rule:</del> SUB-PREC2 - Awakino Precinct-R4 - MAT1</p> <p>AND</p> <p><b>ADD</b> an exemption to applicability of 'SUB-PREC1-Awakino Precinct-MAT1' Matters of Discretion to note that they are not applicable where subdivision is to create allotment/s around an existing or proposed residential unit that forms part of a multi-unit development for which a resource consent or building consent has been granted (excluding minor residential units).</p> <p>AND</p> <p>Any further necessary consequential amendments required.</p>	<ul style="list-style-type: none"> <li>The submitter has requested the above in order to enable a pathway for Multi-Unit Development which is consistent with GRZ-R12 through the PREC2 - Cover Road North Precinct Rules.</li> <li>By including this pathway, the Matters of Discretion under GRZ-R12 will apply and the matters of discretion under SUB-PREC1-Awakino Precinct MAT1 are not considered necessary.</li> </ul>
308.55	Fire and Emergency New Zealand	SUB-PREC1-Awakino Precinct-MAT1	Support	<b>RETAIN</b> SUB-PREC1 - Awakino Precinct-MAT1 Subdivision to create new allotments in Awakino Precinct as notified, subject to resolving the wider fire safety framework of the Proposed District Plan.	<ul style="list-style-type: none"> <li>The standard is supported to the extent that Council can consider as part of the subdivision design in the Awakino Precinct "whether sufficient firefighting water supply is available, taking into account a risk based assessment which is referenced in Note 1".</li> </ul>
332.52	Northland Regional Council	SUB-PREC1-Awakino Precinct-S1	Amend	<p><b>AMEND</b> SUB-PREC1 - Awakino Precinct - S1 to clarify minimum lot size and connection requirements as follows:</p> <ul style="list-style-type: none"> <li>600m<sup>2</sup> sites to have a wastewater connection.</li> <li>400m<sup>2</sup> sites to have both wastewater and reticulated water supply.</li> </ul> <p>AND</p> <p>If necessary, clarify that any unserviced sites in the General residential zone require a minimum net site area of 2,000m<sup>2</sup>.</p>	<ul style="list-style-type: none"> <li>Amendments are sought to clarify minimum lot size connection requirements as per the submitter's submission on SUB-S1.</li> <li>The impact of 600m<sup>2</sup> sites without reticulated services requiring on-site servicing has the potential to impact on water supply due to groundwater contamination. Intensification at the densities proposed will also increase stormwater discharges due to an increase in impermeable areas.</li> <li>The submitter considers a minimum site area of 2,000m<sup>2</sup> consistent with RZ-R3 is required, to ensure services can be provided in a way that complies with regional discharge rules without creating cumulative effects. As sites smaller than 2,000m<sup>2</sup> potentially</li> </ul>

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					require regional consent, there is no 'as of right' potential to develop.
281.14	Moonlight Heights Limited	SUB-PREC1-Awakino Precinct-S2	Support	<b>RETAIN</b> SUB-PREC1-Awakino Precinct-S2. AND Any further necessary consequential amendments required.	<ul style="list-style-type: none"> <li>The submitter requests that the above relief as the standard is consistent with the recently approved private plan change.</li> </ul>
308.51	Fire and Emergency New Zealand	SUB-PREC1-Awakino Precinct-S3	Support	<b>RETAIN</b> SUB-PREC1-Awakino Precinct-S3 Water supply as notified.	<ul style="list-style-type: none"> <li>Standard is supported subject to relief sought in relation to SUB-S5.</li> </ul>
308.52	Fire and Emergency New Zealand	SUB-PREC1-Awakino Precinct-S6	Support	<b>RETAIN</b> SUB-PREC1 - Awakino Precinct-S6 Access in Awakino Precinct as notified.	<ul style="list-style-type: none"> <li>The requirement that each allotment shall have legal access to a formed road and that vehicular access be designed and constructed in accordance with TRAN-R4 is supported.</li> </ul>
281.15	Moonlight Heights Limited	SUB-PREC1-Awakino Precinct-S9	Oppose	<b>DELETE</b> SUB-PREC1-Awakino Precinct-S9. AND Any further necessary consequential amendments required.	<ul style="list-style-type: none"> <li>The submitter has requested this as enabling subdivision to a minimum lot size of 400m<sup>2</sup> with no requirement for road upgrades to existing vested roads is efficient and effective use of land within this precinct.</li> </ul>
332.53	Northland Regional Council	SUB-PREC1-Awakino Precinct-S12	Amend	<b>AMEND</b> SUB-PREC1 - Awakino Precinct - S12 to refer to "archaeological sites" rather than "ecological values".	<ul style="list-style-type: none"> <li>As drafted, the Standard references ecological values rather than Archaeological sites.</li> </ul>
260.18	The Rise Limited	SUB-PREC2-Cove Road North Precinct-MAT1	Amend	<b>AMEND</b> the SUB-PREC2 - Cove Road North Precinct - MAT1 heading as follows: Rule: SUB-PREC2 - Cove Road North Precinct-R1MAT1 AND <b>ADD</b> an exemption to 2. Subdivision Design and 4. Northern Sub-Precinct to note the matters of discretion are not applicable where subdivision is to create allotments around an existing or proposed residential unit that forms part of a consented multi-unit development for which a resource consent or building consent has been granted (excluding minor residential units). AND Any further necessary consequential amendments required to achieve the relief sought.	<ul style="list-style-type: none"> <li>No specific reasons provided for these amendments sought.</li> </ul>
300.39	Bream Tail Residents Association Incorporated	SUB-PREC2-Cove Road North Precinct-MAT1	Amend	<b>AMEND</b> Matters of discretion to SUB-PREC2-Cove Road North Precinct-MAT1 to implement the amendments sought to policy SUB-P13 in relation to the Cove Road North Precinct. AND Any consequential amendments or alternative relief to address the matters raised in the submission.	<ul style="list-style-type: none"> <li>Refer to submission for detailed reasoning. The submission seeks that an extensive set of new provisions is introduced to the Cove Road North Precinct, in respect to reverse sensitivity, providing an appropriate transition between urban and rural, protection of indigenous biodiversity, and the maintenance and enhancement of rural character, landscape values and amenity values.</li> </ul>
308.56	Fire and Emergency New Zealand	SUB-PREC2-Cove Road North Precinct-MAT1	Support	<b>RETAIN</b> SUB-PREC2 - Cove Road North Precinct-MAT1 Subdivision to create new allotments in the Cove Road North Precinct as notified, subject to resolving the wider fire safety framework of the Proposed District Plan.	<ul style="list-style-type: none"> <li>SUB-PREC2 - Cove Road North Precinct-MAT1 is supported to the extent that Council can consider as part of the subdivision design in the Cove Road North Precinct whether "sufficient firefighting water supply is available, taking into account a risk-based assessment (refer to Note 1 below)"</li> </ul>
260.14	The Rise Limited	SUB-PREC2-Cove Road North Precinct-S1	Amend	<b>ADD</b> an exception to minimum allotment sizes under SUB-PREC2- Cove Road North Precinct – S1 as follows: <u>Except that no minimum net site area requirement applies to any allotment created around an existing or proposed residential unit that forms part of a multi-unit development for which a resource consent or building consent has been granted (excluding minor residential units).</u> AND Any further necessary consequential amendments required to achieve the relief sought.	<ul style="list-style-type: none"> <li>The submitter requests an exemption to minimum lot sizes is added to SUB-PREC2- Cove Road North Precinct – S1 in order to give effect to policies and achieve consistency with existing Cove Road North Precinct Provisions and the proposed residential zone.</li> </ul>
300.38	Bream Tail Residents Association Incorporated	SUB-PREC2-Cove Road North Precinct-S1	Amend	<b>AMEND</b> SUB-PREC2-S1 to include new subdivision standards for the Cove Road North Precinct, and to include an activity status where compliance with these new standards is not met as a discretionary activity. The new standards should include a full suite of measures to implement the amendments to policy SUB-P13 sought in this	<ul style="list-style-type: none"> <li>Refer to submission for detailed reasoning. The submission seeks an extensive set of provisions is introduced to the Cove Road North Precinct, in respect to reverse sensitivity, providing an appropriate transition between urban and rural, protection of indigenous biodiversity, and the maintenance and</li> </ul>

## Proposed Kaipara District Plan

### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<p>submission in relation to the Cove Road North Precinct, including, but not limited to the following:</p> <ol style="list-style-type: none"> <li>Apply a minimum net site area of 4000m<sup>2</sup> to lots within the Northern Sub-Precinct on the Cove Road North Precinct Plan 1 (as that area is sought to be amended by elsewhere by this submission).</li> <li>Landscape buffer planting to a minimum 5 metres width along the shared boundary of properties at Bream Tail Farm (Bream Tail) (as identified in the map at Attachment 1 to this submission).</li> <li>A setback of building platforms of 20 metres from the shared boundary of properties at Bream Tail.</li> <li>Prohibitions on cats, dogs and mustelids on new sites created.</li> <li>Requirements to construct and maintain a fence along the shared boundary with Bream Tail to prevent animals entering the Bream Tail property.</li> <li>Requirements for no-complaints covenants to be registered on new residential sites created in relation to the continuation of the farming operation at Bream Tail.</li> <li>Requirements for lighting such as down-lighting, orientation and maximum luminescence to avoid adverse effects on the night sky.</li> </ol> <p>AND</p> <p>Any consequential amendments or alternative relief to address the matters raised in the submission.</p>	enhancement of rural character, landscape values and amenity values.
332.54	Northland Regional Council	SUB-PREC2-Cove Road North Precinct-S1	Amend	<p><b>AMEND</b> SUB-PREC2-Cove Road North Precinct-S1 to clarify minimum lot size and connection requirements as follows:</p> <ul style="list-style-type: none"> <li>600m<sup>2</sup> sites to have a wastewater connection.</li> <li>400m<sup>2</sup> sites to have both wastewater and reticulated water supply.</li> </ul> <p>AND</p> <p>If necessary, clarify that any unserviced sites in the General residential zone require a minimum net site area of 2,000m<sup>2</sup>.</p>	<ul style="list-style-type: none"> <li>Amendments are sought to clarify minimum lot size connection requirements as per the submitter's submission on SUB-S1.</li> <li>The impact of 600m<sup>2</sup> sites without reticulated services requiring on-site servicing has the potential to impact on water supply due to groundwater contamination. Intensification at the densities proposed will also increase stormwater discharges due to an increase in impermeable areas.</li> <li>The submitter considers a minimum site area of 2,000m<sup>2</sup> consistent with RZ-R3 is required, to ensure services can be provided in a way that complies with regional discharge rules without creating cumulative effects. As sites smaller than 2,000m<sup>2</sup> potentially require regional consent, there is no 'as of right' potential to develop.</li> </ul>
260.15	The Rise Limited	SUB-PREC2-Cove Road North Precinct-S2	Amend	<p><b>AMEND</b> SUB-PREC2- Cove Road North Precinct - S2 by removing Clause 1(a) reference to Council approval.</p> <p>AND</p> <p>Any further necessary consequential amendments required to achieve the relief sought.</p>	<ul style="list-style-type: none"> <li>Requiring third party approval within a permitted activity is ultra vires.</li> </ul>
300.86	Bream Tail Residents Association Incorporated	SUB-PREC2-Cove Road North Precinct-S2	Amend	<p><b>AMEND</b> SUB-PREC2-S2 to include new subdivision standards for the Cove Road North Precinct, and to include an activity status where compliance with these new standards is not met as a discretionary activity.</p> <p>The new standards should include a full suite of measures to implement the amendments to policy SUB-P13 sought in this submission in relation to the Cove Road North Precinct, including, but not limited to the following:</p> <ol style="list-style-type: none"> <li>Apply a minimum net site area of 4000m<sup>2</sup> to lots within the Northern Sub-Precinct on the Cove Road North Precinct Plan 1 (as that area is sought to be amended by elsewhere by this submission).</li> <li>Landscape buffer planting to a minimum 5 metres width along the shared boundary of properties at Bream Tail Farm (Bream Tail) (as identified in the map at Attachment 1 to this submission).</li> <li>A setback of building platforms of 20 metres from the shared boundary of properties at Bream Tail.</li> <li>Prohibitions on cats, dogs and mustelids on new sites created.</li> <li>Requirements to construct and maintain a fence along the shared boundary with Bream Tail to prevent animals entering the Bream Tail property.</li> </ol>	<ul style="list-style-type: none"> <li>Refer to submission for detailed reasoning. The submission seeks an extensive set of provisions is introduced to the Cove Road North Precinct, in respect to reverse sensitivity, providing an appropriate transition between urban and rural, protection of indigenous biodiversity, and the maintenance and enhancement of rural character, landscape values and amenity values.</li> </ul>



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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<p>f. Requirements for no-complaints covenants to be registered on new residential sites created in relation to the continuation of the farming operation at Bream Tail.</p> <p>g. Requirements for lighting such as down-lighting, orientation and maximum luminescence to avoid adverse effects on the night sky.</p> <p>AND</p> <p>Any consequential amendments or alternative relief to address the matters raised in the submission.</p>	
308.53	Fire and Emergency New Zealand	SUB-PREC2-Cove Road North Precinct-S2	Amend	<p><b>AMEND</b> SUB-PREC2 - Cove Road North Precinct-S2 Water supply, as follows:</p> <p>...</p> <p>1. Where a public supply is not available, water supplies to all developments shall:</p> <p>a. Meet the requirements of PREC2 - Cove Road North Precinct Table 1: Water supply requirements where a public supply is not available</p> <p>b. <u>Meet the requirements of the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u></p> <p>...</p> <p><u>Note: The New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 should be consulted when determining the most appropriate design for firefighting water supply. Fire and Emergency New Zealand is available to assist with this.</u></p> <p>For avoidance of doubt, an example of sufficient firefighting water for a single residential unit will generally include (subject to site-specific risks) 10,000 litres of water from sources that are:</p> <p>a. Within 90 metres of an identified building platform on each lot;</p> <p>b. Existing or likely to be available at a time of development of the lot;</p> <p>c. Accessible and available all year round; and</p> <p>May be comprised of water tanks, permanent natural waterbodies, dams, swimming pools, whether located on or off the lot.</p> <p>OR</p> <p><b>RETAIN</b> the Note in SUB-PREC2-Cove Road North Precinct-S2 subject to confirmation that a satisfactory fire safety framework exists, and with a confirmed risk-based framework behind it.</p>	<ul style="list-style-type: none"> <li>Table 1 specified in SUB-PREC2(2) appears to be reflective of potable water supply requirements only. There is no mention of firefighting water supply. Therefore, a new standard that addresses an apparent gap for unreticulated development scenarios and the provision of an adequate firefighting water supply in Cove Road North Precinct is sought. This addition is considered to adequately give effect to SUB-P2.</li> <li>The submitter recognises that the 'note' is reflective of 'Note 8' of the Operative District Plan. However, in the Operative District Plan, this note was associated with the need to take into account a risk-based assessment. This reference no longer exists in the Proposed District Plan, with the exception of SUB-PREC1 - Awakino Precinct-MAT1, SUB-PREC2 - Cove Road North Precinct-MAT1 and EESPZ-SUB-MAT1. The note is also not connected to a requirement in the standard itself, is not enforceable and requirements do not align with the requirements set out in SNZ PAS 4509:2008 which could result in sub-optimal and ineffective outcomes.</li> <li>The submitter would welcome the opportunity to come up with a provision that better reflect Council processes, while ensuring that Fire and Emergency's operational requirements are met, and fire risk is appropriately managed through the consent process.</li> </ul>
300.87	Bream Tail Residents Association Incorporated	SUB-PREC2-Cove Road North Precinct-S3	Amend	<p><b>AMEND</b> SUB-PREC2-S3 to include new subdivision standards for the Cove Road North Precinct, and to include an activity status where compliance with these new standards is not met as a discretionary activity.</p> <p>The new standards should include a full suite of measures to implement the amendments to policy SUB-P13 sought in this submission in relation to the Cove Road North Precinct, including, but not limited to the following:</p> <p>a. Apply a minimum net site area of 4000m<sup>2</sup> to lots within the Northern Sub-Precinct on the Cove Road North Precinct Plan 1 (as that area is sought to be amended by elsewhere by this submission).</p> <p>b. Landscape buffer planting to a minimum 5 metres width along the shared boundary of properties at Bream Tail Farm (Bream Tail) (as identified in the map at Attachment 1 to this submission).</p> <p>c. A setback of building platforms of 20 metres from the shared boundary of properties at Bream Tail.</p> <p>d. Prohibitions on cats, dogs and mustelids on new sites created.</p> <p>e. Requirements to construct and maintain a fence along the shared boundary with Bream Tail to prevent animals entering the Bream Tail property.</p> <p>f. Requirements for no-complaints covenants to be registered on new residential sites created in relation to the continuation of the farming operation at Bream Tail.</p>	<ul style="list-style-type: none"> <li>Refer to submission for detailed reasoning. The submission seeks an extensive set of provisions is introduced to the Cove Road North Precinct, in respect to reverse sensitivity, providing an appropriate transition between urban and rural, protection of indigenous biodiversity, and the maintenance and enhancement of rural character, landscape values and amenity values.</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<p>g. Requirements for lighting such as down-lighting, orientation and maximum luminescence to avoid adverse effects on the night sky.</p> <p>AND</p> <p>Any consequential amendments or alternative relief to address the matters raised in the submission.</p>	
260.16	The Rise Limited	SUB-PREC2- Cove Road North Precinct-S4	Amend	<p><b>AMEND</b> SUB-PREC2- Cove Road North Precinct - S4 by removing Clause 1(a) reference to Council approval.</p> <p>AND</p> <p>Any further necessary consequential amendments required to achieve the relief sought.</p>	<ul style="list-style-type: none"> <li>Requiring third party approval within a permitted activity is ultra vires.</li> </ul>
300.88	Bream Tail Residents Association Incorporated	SUB-PREC2- Cove Road North Precinct-S4	Amend	<p><b>AMEND</b> SUB-PREC2-S4 to include new subdivision standards for the Cove Road North Precinct, and to include an activity status where compliance with these new standards is not met as a discretionary activity.</p> <p>The new standards should include a full suite of measures to implement the amendments to policy SUB-P13 sought in this submission in relation to the Cove Road North Precinct, including, but not limited to the following:</p> <ol style="list-style-type: none"> <li>Apply a minimum net site area of 4000m<sup>2</sup> to lots within the Northern Sub-Precinct on the Cove Road North Precinct Plan 1 (as that area is sought to be amended by elsewhere by this submission).</li> <li>Landscape buffer planting to a minimum 5 metres width along the shared boundary of properties at Bream Tail Farm (Bream Tail) (as identified in the map at Attachment 1 to this submission).</li> <li>A setback of building platforms of 20 metres from the shared boundary of properties at Bream Tail.</li> <li>Prohibitions on cats, dogs and mustelids on new sites created.</li> <li>Requirements to construct and maintain a fence along the shared boundary with Bream Tail to prevent animals entering the Bream Tail property.</li> <li>Requirements for no-complaints covenants to be registered on new residential sites created in relation to the continuation of the farming operation at Bream Tail.</li> <li>Requirements for lighting such as down-lighting, orientation and maximum luminescence to avoid adverse effects on the night sky.</li> </ol> <p>AND</p> <p>Any consequential amendments or alternative relief to address the matters raised in the submission.</p>	<ul style="list-style-type: none"> <li>Refer to submission for detailed reasoning. The submission seeks an extensive set of provisions is introduced to the Cove Road North Precinct, in respect to reverse sensitivity, providing an appropriate transition between urban and rural, protection of indigenous biodiversity, and the maintenance and enhancement of rural character, landscape values and amenity values.</li> </ul>
300.89	Bream Tail Residents Association Incorporated	SUB-PREC2- Cove Road North Precinct-S5	Amend	<p><b>AMEND</b> SUB-PREC2-S5 to include new subdivision standards for the Cove Road North Precinct, and to include an activity status where compliance with these new standards is not met as a discretionary activity.</p> <p>The new standards should include a full suite of measures to implement the amendments to policy SUB-P13 sought in this submission in relation to the Cove Road North Precinct, including, but not limited to the following:</p> <ol style="list-style-type: none"> <li>Apply a minimum net site area of 4000m<sup>2</sup> to lots within the Northern Sub-Precinct on the Cove Road North Precinct Plan 1 (as that area is sought to be amended by elsewhere by this submission).</li> <li>Landscape buffer planting to a minimum 5 metres width along the shared boundary of properties at Bream Tail Farm (Bream Tail) (as identified in the map at Attachment 1 to this submission).</li> <li>A setback of building platforms of 20 metres from the shared boundary of properties at Bream Tail.</li> <li>Prohibitions on cats, dogs and mustelids on new sites created.</li> <li>Requirements to construct and maintain a fence along the shared boundary with Bream Tail to prevent animals entering the Bream Tail property.</li> <li>Requirements for no-complaints covenants to be registered on new residential sites created in relation to the continuation of the farming operation at Bream Tail.</li> </ol>	<ul style="list-style-type: none"> <li>Refer to submission for detailed reasoning. The submission seeks an extensive set of provisions is introduced to the Cove Road North Precinct, in respect to reverse sensitivity, providing an appropriate transition between urban and rural, protection of indigenous biodiversity, and the maintenance and enhancement of rural character, landscape values and amenity values.</li> </ul>

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### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<p>g. Requirements for lighting such as down-lighting, orientation and maximum luminescence to avoid adverse effects on the night sky.</p> <p>AND</p> <p>Any consequential amendments or alternative relief to address the matters raised in the submission.</p>	
308.54	Fire and Emergency New Zealand	SUB-PREC2-Cove Road North Precinct-S5	Support	<b>RETAIN</b> SUB-PREC2 - Cove Road North Precinct-S5 Access in Cove Road North Precinct as notified.	<ul style="list-style-type: none"> <li>The requirement that each allotment shall have legal access to a formed road and that vehicular access be designed and constructed in accordance with TRAN-R4 is supported.</li> </ul>
260.17	The Rise Limited	SUB-PREC2-Cove Road North Precinct-S6	Amend	<p><b>AMEND</b> SUB-PREC2 - Cove Road North Precinct-S6 Clause 3.a. as follows:</p> <p>a. Adequacy of the extent, location and formation of pedestrian connectivity (footpath connections) along Cove Road and Mangawhai Heads Road, and roads within the Cove Road North Precinct, based on the level of demand generated by the development <u>and need to mitigate potential effect directly associated with the proposal</u>; and</p> <p>AND</p> <p>Any further necessary consequential amendments required to achieve the relief sought.</p>	<ul style="list-style-type: none"> <li>The submitter seeks a minor amendment to provide further clarity around scope of works to improve interpretation and implementation.</li> </ul>
300.90	Bream Tail Residents Association Incorporated	SUB-PREC2-Cove Road North Precinct-S6	Amend	<p><b>AMEND</b> SUB-PREC2-S6 to include new subdivision standards for the Cove Road North Precinct, and to include an activity status where compliance with these new standards is not met as a discretionary activity.</p> <p>The new standards should include a full suite of measures to implement the amendments to policy SUB-P13 sought in this submission in relation to the Cove Road North Precinct, including, but not limited to the following:</p> <p>a. Apply a minimum net site area of 4000m<sup>2</sup> to lots within the Northern Sub-Precinct on the Cove Road North Precinct Plan 1 (as that area is sought to be amended by elsewhere by this submission).</p> <p>b. Landscape buffer planting to a minimum 5 metres width along the shared boundary of properties at Bream Tail Farm (Bream Tail) (as identified in the map at Attachment 1 to this submission).</p> <p>c. A setback of building platforms of 20 metres from the shared boundary of properties at Bream Tail.</p> <p>d. Prohibitions on cats, dogs and mustelids on new sites created.</p> <p>e. Requirements to construct and maintain a fence along the shared boundary with Bream Tail to prevent animals entering the Bream Tail property.</p> <p>f. Requirements for no-complaints covenants to be registered on new residential sites created in relation to the continuation of the farming operation at Bream Tail.</p> <p>g. Requirements for lighting such as down-lighting, orientation and maximum luminescence to avoid adverse effects on the night sky.</p> <p>AND</p> <p>Any consequential amendments or alternative relief to address the matters raised in the submission.</p>	<ul style="list-style-type: none"> <li>Refer to submission for detailed reasoning. The submission seeks an extensive set of provisions is introduced to the Cove Road North Precinct, in respect to reverse sensitivity, providing an appropriate transition between urban and rural, protection of indigenous biodiversity, and the maintenance and enhancement of rural character, landscape values and amenity values.</li> </ul>
300.91	Bream Tail Residents Association Incorporated	SUB-PREC2-Cove Road North Precinct-S7	Amend	<p><b>AMEND</b> SUB-PREC2-S7 to include new subdivision standards for the Cove Road North Precinct, and to include an activity status where compliance with these new standards is not met as a discretionary activity.</p> <p>The new standards should include a full suite of measures to implement the amendments to policy SUB-P13 sought in this submission in relation to the Cove Road North Precinct, including, but not limited to the following:</p> <p>a. Apply a minimum net site area of 4000m<sup>2</sup> to lots within the Northern Sub-Precinct on the Cove Road North Precinct Plan 1 (as that area is sought to be amended by elsewhere by this submission).</p> <p>b. Landscape buffer planting to a minimum 5 metres width along the shared boundary of properties at</p>	<ul style="list-style-type: none"> <li>Refer to submission for detailed reasoning. The submission seeks an extensive set of provisions is introduced to the Cove Road North Precinct, in respect to reverse sensitivity, providing an appropriate transition between urban and rural, protection of indigenous biodiversity, and the maintenance and enhancement of rural character, landscape values and amenity values.</li> </ul>

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### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<p>Bream Tail Farm (Bream Tail) (as identified in the map at Attachment 1 to this submission).</p> <p>c. A setback of building platforms of 20 metres from the shared boundary of properties at Bream Tail.</p> <p>d. Prohibitions on cats, dogs and mustelids on new sites created.</p> <p>e. Requirements to construct and maintain a fence along the shared boundary with Bream Tail to prevent animals entering the Bream Tail property.</p> <p>f. Requirements for no-complaints covenants to be registered on new residential sites created in relation to the continuation of the farming operation at Bream Tail.</p> <p>g. Requirements for lighting such as down-lighting, orientation and maximum luminescence to avoid adverse effects on the night sky.</p> <p>AND</p> <p>Any consequential amendments or alternative relief to address the matters raised in the submission.</p>	
304.105	Director General of Conservation	SUB-PREC2-Cove Road North Precinct-S7	Amend	<p><b>AMEND</b> SUB-PREC2-S7 to provide more detail regarding what an Ecological Enhancement and Management Plan includes, either referencing or ensuring consistency with Appendix 5 of the Northland Regional Policy Statement.</p> <p>AND</p> <p>Any further or alternative relief to like effect to that sought.</p>	<ul style="list-style-type: none"> <li>The submitter considers the intention of SUB-PREC2-S7 to be good but highlights the lack of reference or detail regarding what information is included in an Ecological Enhancement and Management Plan.</li> </ul>
300.92	Bream Tail Residents Association Incorporated	SUB-PREC2-Cove Road North Precinct-S8	Amend	<p><b>AMEND</b> SUB-PREC2-S8 to include new subdivision standards for the Cove Road North Precinct, and to include an activity status where compliance with these new standards is not met as a discretionary activity.</p> <p>The new standards should include a full suite of measures to implement the amendments to policy SUB-P13 sought in this submission in relation to the Cove Road North Precinct, including, but not limited to the following:</p> <p>a. Apply a minimum net site area of 4000m<sup>2</sup> to lots within the Northern Sub-Precinct on the Cove Road North Precinct Plan 1 (as that area is sought to be amended by elsewhere by this submission).</p> <p>b. Landscape buffer planting to a minimum 5 metres width along the shared boundary of properties at Bream Tail Farm (Bream Tail) (as identified in the map at Attachment 1 to this submission).</p> <p>c. A setback of building platforms of 20 metres from the shared boundary of properties at Bream Tail.</p> <p>d. Prohibitions on cats, dogs and mustelids on new sites created.</p> <p>e. Requirements to construct and maintain a fence along the shared boundary with Bream Tail to prevent animals entering the Bream Tail property.</p> <p>f. Requirements for no-complaints covenants to be registered on new residential sites created in relation to the continuation of the farming operation at Bream Tail.</p> <p>g. Requirements for lighting such as down-lighting, orientation and maximum luminescence to avoid adverse effects on the night sky.</p> <p>AND</p> <p>Any consequential amendments or alternative relief to address the matters raised in the submission.</p>	<ul style="list-style-type: none"> <li>Refer to submission for detailed reasoning. The submission seeks an extensive set of provisions is introduced to the Cove Road North Precinct, in respect to reverse sensitivity, providing an appropriate transition between urban and rural, protection of indigenous biodiversity, and the maintenance and enhancement of rural character, landscape values and amenity values.</li> </ul>
165.2	TAP Adventures Ltd	SUB-R1	Amend	<p><b>ADD</b> the following clauses to SUB-R1.1. Boundary Adjustments as follows:</p> <p>b. <u>Boundary Adjustments comply with SUB-S1 to SUB-S7; or</u></p> <p>c. <u>The net site area of any proposed allotment created by the boundary adjustment is the same as, or does not differ by more than 15% of the net site area of that allotment as it existed prior to the boundary adjustment; or</u></p> <p>d. <u>Where an existing lot size is already non-complying with the minimum lot size for the General rural zone as a controlled activity, then the degree of non-compliance shall not be</u></p>	<ul style="list-style-type: none"> <li>To provide greater flexibility and choice, ensuring existing titles with a small area are still able to undertake a boundary adjustment and a percentage change between parent titles can occur as a controlled activity.</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<u>increased as a result of the boundary adjustment.</u>	
213.3	Blue Sky Land Company Ltd	SUB-R1	Amend	<b>AMEND</b> the name of SUB-R1 to "Adjustment of Existing Sites" AND <b>AMEND</b> SUB-R1 to replace all references to "allotment" with "sites". OR Alternative relief with similar effect.	<ul style="list-style-type: none"> <li>The subdivision rules refer to both minimum 'allotment' area, and 'net site area' - both terms which have different meanings in accordance with the definitions section of the Proposed District Plan.</li> <li>The difference in terminology used within the rules causes confusion.</li> </ul>
249.3	Khans Developments and Investments Limited	SUB-R1	Amend	<b>AMEND</b> the name of SUB-R1 to "Adjustment of Existing Sites" AND <b>AMEND</b> SUB-R1 to replace all references to 'allotment' with 'sites'. OR Alternative relief with similar effect.	<ul style="list-style-type: none"> <li>The subdivision rules refer to both minimum 'allotment' area, and 'net site area' - both terms which have different meanings in accordance with the definitions section of the Proposed District Plan.</li> <li>The difference in terminology used within the rules causes confusion.</li> </ul>
309.75	Clarus	SUB-R1	Amend	<b>ADD</b> the following to SUB-R1.2: <u>d. Access to the Gas or Petroleum Transmission Pipeline Corridor and National Grid Yard for the owner and operator.</u>	<ul style="list-style-type: none"> <li>It is possible that a boundary adjustment could affect access to the Gas or Petroleum Transmission Pipeline Corridor and this should be included in the matters of control.</li> </ul>
126.1	Loralie Sheppard	SUB-R1	Support	<b>RETAIN</b> SUB1-R1 Boundary Adjustments.	<ul style="list-style-type: none"> <li>As a land survey company, the submitter generally supports subdivision rules.</li> </ul>
136.94	Federated Farmers of New Zealand (Inc) - Northland Province	SUB-R1	Support	<b>RETAIN</b> SUB-R1 as notified. OR With wording that achieves similar intent. AND Any consequential amendments.	<ul style="list-style-type: none"> <li>The submitter supports SUB-R1 as notified.</li> </ul>
212.25	BA & JK Paton Ltd	SUB-R1	Support	<b>RETAIN</b> SUB-R1. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
217.65	Cato Bolam Consultants Limited	SUB-R1	Support	<b>RETAIN</b> SUB-R1. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> </ul>
315.47	Horizon Surveying & Land Development	SUB-R1	Support	<b>RETAIN</b> SUB-R1.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
151.9	Mangawhai Bush Estate	SUB-R2	Oppose	<b>DELETE</b> SUB-R2.11. and any other rules associated with the Mangawhai/Hakaru Growth Management Area.	<ul style="list-style-type: none"> <li>The Managed Growth Overlay is inconsistent with Part II of the Resource Management Act, section 7b) efficient use and development of natural and physical resources.</li> <li>The Managed Growth Overlay and Mapping Extent does not appropriately give effect to national direction of the National Policy Statement for Urban Development and the Northland Regional Policy Statement.</li> <li>The Proposed District Plan does not meet the requirements of the Northland Regional Policy Statement where key points of the Northland Regional Policy Statement with respect to urban form and development, are covered.</li> <li>The Overlay is inconsistent with the Councils Long Term Plan.</li> <li>The Managed Growth Overlay which essentially restricts infill residential development and directs this to large land holdings which have been subject to recent private plan changes.</li> <li>The surrounding environment is not rural in nature and has very limited rural character, the Hakaru / Mangawhai catchment is rural lifestyle / rural residential in nature.</li> </ul>
126.2	Loralie Sheppard	SUB-R2	Support	<b>RETAIN</b> SUB-R2 Alterations to cross leases or conversion of tenure.	<ul style="list-style-type: none"> <li>As a land survey company, the submitter generally supports subdivision rules.</li> </ul>
136.95	Federated Farmers of New Zealand (Inc) -	SUB-R2	Support	<b>RETAIN</b> SUB-R2 as notified. OR	<ul style="list-style-type: none"> <li>The submitter supports SUB-R2 as notified.</li> </ul>

## Proposed Kaipara District Plan

### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
	Northland Province			With wording that achieves similar intent. AND Any consequential amendments.	
217.66	Cato Bolam Consultants Limited	SUB-R2	Support	<b>RETAIN</b> SUB-R2. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> </ul>
2.1	Loralie Sheppard	SUB-R3	Amend	<b>AMEND</b> SUB-R3.1.b as below: "Subdivision in the General rural zone does not contain; <del>land</del> defined as highly productive land (as determined by either the New Zealand Land Resource Inventory maps or a property scale site specific assessment Land Use Capability Classification prepared by a suitably qualified person and accepted by Council); and i. <del>Highly productive land; or</del> ii. <del>Does contain highly productive land but has been determined an exception under clause 3.8 of the National Policy Statement for Highly Productive Land 2022 and amended August 2024. (Highly productive land as determined by either the New Zealand Land Resource Inventory maps* or a property scale site specific assessment Land Use Capability Classification prepared by a suitably qualified person and accepted by Council); and</del> * <del>For the determination of whether or not a property or part thereof has highly productive land, it has been taken into consideration that the New Zealand Land Resource Inventory maps have a scale of 1 : 50,000, and that the minimum area that can be separately defined at their scale is 10 ha."</del>	<ul style="list-style-type: none"> <li>No allowance in the Subdivision rules for the exceptions provided under the National Policy Statement for Highly Productive Land 2022 and amended 2024.</li> </ul>
50.16	Evolve Planning and Landscape Architecture	SUB-R3	Amend	<b>AMEND</b> the activity status of SUB-R3 from Controlled to Restricted Discretionary or Discretionary. AND <b>ADD</b> assessment criteria to SUB-R3 in relation to character and amenity values. AND <b>AMEND</b> the wording of SUB-R3 based on the above.	<ul style="list-style-type: none"> <li>The submitter opposes the wording of these rules as they are permissive and will result in poor development outcomes across the District within the General rural zone, Rural lifestyle zone and Outstanding Natural Landscape.</li> <li>When subdivisions are controlled there is no ability for a subdivision to be declined and the assessment criteria does not include any aspects related to the natural environment including ecology, landscape and the like.</li> <li>The environmental benefit type provision provides for the same number of lots as the general rule which provides no incentive to protect or restore any natural features.</li> <li>The title date reference provides no use and within the Operative Plan is not upheld.</li> <li>There is no provision to require the protection of Outstanding Natural Landscapes, Outstanding Natural Features or areas of Outstanding Natural Character at the time of subdivision which is contrary to Part II of the Resource Management Act and other high level national and regional planning documents.</li> </ul>
82.1	James Dow	SUB-R3	Amend	<b>AMEND</b> SUB-R3 activity status from discretionary to controlled for subdivisions within the developed part of Mangawhai Heads township where SUB-S1 to SUB-S15 are complied with.	<ul style="list-style-type: none"> <li>A discretionary activity status should not apply to the areas of Mangawhai that were developed a long time ago and feature very few properties that could be subdivided and achieve a minimum lot size of 600m<sup>2</sup>.</li> <li>The submitter considers that the discretionary activity status (for subdivision within already developed parts of Mangawhai) imposed by the Mangawhai Hākaru Managed Growth Area Overlay too prohibitive and unjustifiable. As stated, there are minimal properties able to be subdivided further and application of the restrictive Growth Area Overlay to those areas already developed is not in line with Policy SUB-P12.</li> <li>The area near the estuary and Wood Street shops is the well-established core of the Mangawhai Heads township and should be afforded infrastructure in the first instance in any subdivision scenario. If there are limitations on Council infrastructure, this core area should be prioritised and Council should not be free to decide whether to develop new areas over those that are existing within the Mangawhai/Hākaru Managed Growth Area.</li> </ul>



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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
105.2	Joanne Floyd	SUB-R3	Amend	<b>AMEND</b> SUB-R3 No specific decision requested; however, the submission considers that SUB-R3 is not restrictive enough as it does not deal with capacity of infrastructure sufficiently. If there is no infrastructure capacity, then the subdivision cannot be declined. The submitter notes that there is provision under the contributions policy to require contribution towards upgrading infrastructure, but submitter considers this may be impractical to achieve. The development could trigger effects that result in a non-compliance with regional consents and have actual adverse effects.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
212.26	BA & JK Paton Ltd	SUB-R3	Amend	<b>AMEND</b> SUB-R3 by simplifying the format for clarity and ease of use. <b>and</b> <b>RETAIN</b> SUB-R3.1(b) <b>AND</b> Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter requests the above relief without limiting the scope of the submission on the details in the SUB Standards, other Proposed District Plan chapters or maps, including scope to make further submissions on a variation to introduce updated Kaipara District Council Engineering Standards.</li> <li>The submitter specifically supports SUB-3.1(b) as it provides the option to provide a site-specific assessment LUC Classification.</li> </ul>
222.45	Kaipara District Council	SUB-R3	Amend	<b>AMEND</b> wording for SUB-R3.3 (f) and SUB-R4.2 (d) for consistency.	<ul style="list-style-type: none"> <li>There is inconsistency in wording between the rules.</li> </ul>
222.47	Kaipara District Council	SUB-R3	Amend	<b>AMEND</b> SUB-R3 to include consideration of alternative electricity sources in the matters for control.	<ul style="list-style-type: none"> <li>Matters over which control is reserved do not consider alternative electricity sources such as solar.</li> </ul>
248.29	Journeys End Limited	SUB-R3	Amend	<b>AMEND</b> SUB-R3 as follows: Activity status: Controlled Where: <ul style="list-style-type: none"> <li>a. All subdivision <u>within the General residential zone, Commercial zone, Light industrial zone and Heavy industrial zone</u> complies with SUB-S1 to SUB-S15;</li> <li>b. All subdivision <u>within the General rural zone and Rural lifestyle zone</u> complies with SUB-S1 – SUB-S4 and SUB-S16.</li> <li>c. Subdivision in the General rural zone does not contain land defined as highly productive land (as determined by either the New Zealand Land Resource Inventory maps or a property scale site specific assessment Land Use Capability Classification prepared by a suitably qualified person and accepted by Council); and</li> <li>d. <u>Subdivision in the General rural zone must create no more than one additional allotment from the Record of Title being subdivided.</u></li> </ul> <b>AND</b> Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>The rule is overly restrictive of subdivision within the General rural zone, drafted as a catch all rule it applies reticulated servicing standard.</li> <li>The rule also limits the creation of a single additional allotment.</li> <li>This rule is in conflict with rules SUB-R4 -R6.</li> </ul>
256.22	P Ryan	SUB-R3	Amend	<b>DELETE</b> SUB-R3.11 and SUB-R3.12 in relation to the Mangawhai/Hakaru Managed Growth Area. <b>AND</b> Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>Limitation of growth based on the proposed Mangawhai/Hakaru Managed Growth Area is not supported.</li> </ul>
273.14	J Grigg	SUB-R3	Amend	<b>PROVIDE</b> a policy framework that provides for interim subdivision where infrastructure capacity is proven, alternatives are offered, or development/financial contributions can resolve effects. <b>AND</b> <b>PROVIDE</b> identification of staging or triggers for releasing subdivision capacity.	<ul style="list-style-type: none"> <li>SUB-R3.11 and SUB-R3.12 tries to freeze subdivision capacity pending structure planning or infrastructure upgrades by does not commit to a timeline, or 'sunset' trigger to resume eligibility to subdivide.</li> </ul>
277.12	Mangawhai Hills Limited	SUB-R3	Amend	<b>DELETE</b> SUB-R3.11. <b>AND</b> Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> <li>The submitter does not support the limitation of development based upon the proposed Mangawhai Hakaru Growth Area Overlay.</li> <li>The Mangawhai Hakaru Growth Area Overlay is an arbitrary area with no s32 justification.</li> <li>Limitation of subdivision is not efficient and/or effective.</li> </ul>
287.50	Silver Fern Farms	SUB-R3	Amend	<b>AMEND</b> SUB-R3.3.g, as follows: <ul style="list-style-type: none"> <li>g. Measures to mitigate potential reverse sensitivity effects on existing land uses, such as the use of <del>no complaints</del> covenants or siting of building platforms; and...</li> </ul> <b>OR</b>	<ul style="list-style-type: none"> <li>The presence of a "no complaints" covenant does not exempt a local authority from its duties to investigate nuisance complaints under the Resource Management Act. The Submitter is concerned that including "no complaints" covenants may result in them being mistakenly applied as a solution for</li> </ul>

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### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				Provisions or wording to similar effect. AND Any necessary and consequential amendments. AND All further relief necessary to give effect to the concerns raised in the submission.	reverse sensitivity effects when they are no substitute for more robust measures, such as the maintenance of appropriate separation between incompatible zones and activities.
300.35	Bream Tail Residents Association Incorporated	SUB-R3	Amend	<p><b>AMEND</b> SUB-R3 or provide an additional rule to provide a discretionary activity status to subdivision of the following land where it complies with the specified additional new subdivision standards as sought in this submission:</p> <ol style="list-style-type: none"> <li>54 Mangawhai Heads Road, Mangawhai (LOT 4 DP 310358);</li> <li>47 Cullen Street, Mangawhai (LOT 100 DP 572492); and</li> <li>55 Cullen Street, Mangawhai (LOT 9 DP 191042).</li> </ol> <p>AND</p> <p><b>ADD</b> a non-complying activity status where compliance with standards is not met.</p> <p>OR</p> <p><b>AMEND</b> the zoning of the properties from General residential zone to General rural zone.</p>	<ul style="list-style-type: none"> <li>Refer to submission for detailed reasoning. Reasons summarised as follows:</li> <li>The controlled activity status and matters of control applicable to the subdivision of General residential zones in rule SUB-R3, are inappropriate as they apply to properties 54 Mangawhai Heads Road, Mangawhai (LOT 4 DP 310358), 47 Cullen Street, Mangawhai (LOT 100 DP 572492), and 55 Cullen Street, Mangawhai (LOT 9 DP 191042) adjoining and in proximity to the southern boundary of Bream Tail.</li> <li>SUB-R3 does not provide specific provisions for this land to ensure it meets the requirements of Resource Management Act 1991 and gives effect to the Northland Regional Policy Statement and other 'higher order' documents.</li> <li>Subdivision of these properties would risk reverse sensitivity effects on Bream Tail and the proposed zoning does not provide a suitable rural to urban transition.</li> <li>Overall submission seeks an extensive new set of provisions is introduced into the Proposed District Plan in relation to these properties.</li> <li>The subdivision provisions do not meet the requirements of the Resource Management Act 1991 and the directives of the Northland Regional Policy Statement policies under section 5.1.</li> <li>Failing the outcomes sought, the submission seeks that the properties be rezoned General rural.</li> </ul>
300.37	Bream Tail Residents Association Incorporated	SUB-R3	Amend	<p><b>AMEND</b> SUB-R3 subclauses 8, 9, and 10 relating to the Cove Road North Precinct to reference the additional standards sought to be applied by this submission to subdivision in the Cove Road Precinct.</p> <p>AND</p> <p>Any consequential amendments or alternative relief to address the matters raised in the submission.</p>	<ul style="list-style-type: none"> <li>Refer to submission for detailed reasoning. The submission seeks that an extensive new set of provisions is introduced to the Proposed District Plan in relation to the identified properties adjoining and in proximity to the southern boundary of Bream Tail, in respect to reverse sensitivity, providing an appropriate transition between urban and rural, protection of indigenous biodiversity, and the maintenance and enhancement of rural character, landscape values and amenity values.</li> </ul>
309.76	Clarus	SUB-R3	Amend	<p><b>AMEND</b> SUB-R3.3, as follows:</p> <p><b>3. Control is reserved over the following matters:</b></p> <p>...</p> <p>i. <u>Impacts upon existing infrastructure that may be located within the parent lot.</u></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"> <li>It is possible that a subdivision could affect access, maintenance or operation of the existing Gas or Petroleum Transmission Pipeline beyond the area protected by designation, through unintended consequences. Consideration of this should be included in the matters of control.</li> </ul>
331.17	Northland Holdings 2016 Limited	SUB-R3	Amend	<p><b>DELETE</b> SUB-R3.11. and SUB-R3.12.</p> <p>AND</p> <p>Any further necessary consequential amendments required to achieve the relief sought.</p>	<ul style="list-style-type: none"> <li>Limiting development within the proposed Mangawhai/Hakaru Managed Growth Area is opposed. The Mangawhai/Hakaru Managed Growth Area is arbitrary and without s32 justification. To limit subdivision within the Mangawhai/Hakaru Managed Growth Area is neither efficient nor effective.</li> </ul>
50.15	Evolve Planning and Landscape Architecture	SUB-R3	Oppose	<b>DELETE</b> SUB-R3.11.	<ul style="list-style-type: none"> <li>The submitter opposes the wording of these rules as they are permissive and will result in poor development outcomes across the District within the General rural zone, Rural lifestyle zone and Outstanding Natural Landscape.</li> <li>When subdivisions are controlled there is no ability for a subdivision to be declined and the assessment criteria does not include any aspects related to the natural environment including ecology, landscape and the like.</li> <li>The environmental benefit type provision provides for the same number of lots as the general rule which</li> </ul>

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### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
					<p>provides no incentive to protect or restore any natural features.</p> <ul style="list-style-type: none"> <li>The title date reference provides no use and within the Operative Plan is not upheld.</li> <li>There is no provision to require the protection of Outstanding Natural Landscapes, Outstanding Natural Features or areas of Outstanding Natural Character at the time of subdivision which is contrary to Part II of the Resource Management Act and other high level national and regional planning documents.</li> </ul>
77.8	Richard (Rick) Ruiterman	SUB-R3	Oppose	<b>DELETE</b> SUB-R3.	<ul style="list-style-type: none"> <li>Development should not be limited by the Mangawhai/Hakaru Managed Growth Area.</li> </ul>
111.2	Joe Fletcher Horizon on behalf of Richie Evans	SUB-R3	Oppose	No specific decision requested, however the submission does not support the Mangawhai/Hakaru Managed Growth Area in its current form as it imposes a rigid and inflexible planning mechanism that may constrain development opportunities that are otherwise appropriate and feasible.	<ul style="list-style-type: none"> <li>The overlay may constrain appropriate and feasible development opportunities.</li> </ul>
117.10	Greg Moore	SUB-R3	Oppose	<b>AMEND</b> SUB-R3 to remove red tape for rural lifestyle development.	<ul style="list-style-type: none"> <li>Rural lifestyle development should be a priority and is a great way to develop Kaipara.</li> <li>The submission refers to non-notified subdivisions in the Rural zone and the need for consistency and allowing for such developments.</li> </ul>
140.59	Horticulture New Zealand	SUB-R3	Oppose	<b>DELETE</b> SUB-R3.1.b and .c. AND <b>DELETE</b> General rural zone from SUB-R3.1 AND Any consequential or alternative amendments required to address the concerns raised by the submitter.	<ul style="list-style-type: none"> <li>The submitter opposes the General rural zone being included in SUB-R3 and considers there is no functional need for the zone's inclusion. Subdivision is more appropriate within the Rural lifestyle zone.</li> </ul>
217.69	Cato Bolam Consultants Limited	SUB-R3	Oppose	<b>ADD</b> a policy framework that provides for interim subdivision where infrastructure capacity is proven, alternatives are offered or financial contributions can resolve effects and allow for identification of staging or triggers for releasing subdivision capacity. This request is made in the context of SUB-R3. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>SUB-R3.11 places a "freeze" on subdivision capacity pending structure planning or infrastructure upgrades but doesn't commit to a timeline.</li> </ul>
237.1	K P Dreadon Limited	SUB-R3	Oppose	<b>ADD</b> the following clause to SUB-R3: <u>No more than one additional allotment may be created under this rule unless the proposal complies with SUB-R6, SUB-R7, or SUB-R10.</u>	<ul style="list-style-type: none"> <li>The current rule does not prevent cumulative subdivision stacking with SUB-R4 and SUB-R6. Clarification is needed to confirm it is one additional lot total per title unless offset conditions are met.</li> </ul>
280.6	Moir Point Park Developments	SUB-R3	Oppose	<b>DELETE</b> SUB-R3.11. and <b>AMEND</b> the maps to correct the extent of the Mangawhai/Hakaru Managed Growth Area.	<ul style="list-style-type: none"> <li>This activity should not be applicable to General Residential Zoning.</li> <li>This activity results in Discretionary or Non-Complying activity status which limits residential subdivision Lots coming forward which would otherwise be controlled, or discretionary in the General residential zone.</li> </ul>
282.11	Murphy Property Development Limited	SUB-R3	Oppose	<b>DELETE</b> SUB-R3.11. AND <b>DELETE</b> SUB-R3.12. AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>Council's Section 32 does not clearly state how this managed growth area has been spatially identified, what the purpose or justification is for the managed growth area.</li> <li>Limitation of subdivision in this area is not efficient nor effective.</li> </ul>
285.14	S & R Brunt	SUB-R3	Oppose	<b>AMEND</b> the Proposed District Plan policy framework to one that provides for interim subdivision where infrastructure capacity is proven, alternatives are offered or development/financial contributions can resolve effects. The submission references SUB-R3.11. AND <b>ADD</b> staging or triggers for releasing subdivision capacity. AND Any other relief that is consistent with and/or consequential to this submission.	<ul style="list-style-type: none"> <li>The measure tries to "freeze" subdivision capacity pending structure planning or infrastructure upgrades but does not commit to a timeline or a 'sunset' trigger to resume eligibility to subdivide.</li> </ul>
291.15	Tovolea Farm Ltd	SUB-R3	Oppose	<b>AMEND</b> the Proposed District Plan policy framework to one that provides for interim subdivision where infrastructure capacity is proven, alternatives are offered or development/financial contributions can resolve effects.	<ul style="list-style-type: none"> <li>The measure tries to "freeze" subdivision capacity pending structure planning or infrastructure upgrades but does not commit to a timeline or a 'sunset' trigger to resume eligibility to subdivide.</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				AND <b>PROVIDE</b> identification of staging or triggers for releasing subdivision capacity. AND Any other relief that is consistent with and/or consequential to this submission.	
293.28	Vermont Street Partners Limited	SUB-R3	Oppose	<b>DELETE</b> SUB-R3, noting submission request to remove the Mangawhai/Hakaru Managed Growth Area. AND Any further necessary consequential amendments.	<ul style="list-style-type: none"> <li>The submitter does not support the limitation of development based upon the proposed Mangawhai/Hakaru Managed Growth Area. For reasons previously discussed this is an arbitrary area with no s32 justification.</li> </ul>
126.3	Loralie Sheppard	SUB-R3	Support	<b>RETAIN</b> SUB-R3 Subdivision to create new allotments.	<ul style="list-style-type: none"> <li>As a land survey company, the submitter generally supports subdivision rules.</li> </ul>
136.96	Federated Farmers of New Zealand (Inc) - Northland Province	SUB-R3	Support	<b>RETAIN</b> SUB-R3 as notified. OR With wording that achieves similar intent. AND Any consequential amendments.	<ul style="list-style-type: none"> <li>The submitter supports SUB-R3 as notified.</li> </ul>
217.67	Cato Bolam Consultants Limited	SUB-R3	Support	<b>AMEND</b> SUB-R3 by simplifying the formatting for clarity and ease of use. AND <b>RETAIN</b> SUB-R3.1.b. which provides the option to provide a site-specific assessment for LUC Classification. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps, including scope to make further submissions on a variation to introduce update Kaipara District Council Engineering Standards.</li> </ul>
257.18	Piroa Conservation Trust	SUB-R3	Support	<b>RETAIN</b> SUB-R3.11 and SUB-R3.12.	<ul style="list-style-type: none"> <li>This gives Council full discretion in its decision making.</li> </ul>
272.19	J & C Hawley	SUB-R3	Support	<b>RETAIN</b> SUB-R3.1.b. and SUB-R3.1.c. as notified.	<ul style="list-style-type: none"> <li>It is important to protect highly productive land while maintaining the existing rural character.</li> </ul>
272.20	J & C Hawley	SUB-R3	Support	<b>RETAIN</b> SUB-R3.11 and SUB-R3.12. as notified.	<ul style="list-style-type: none"> <li>This status gives Council full discretion in its decision making.</li> </ul>
278.18	Marunui Conservation Ltd	SUB-R3	Support	<b>RETAIN</b> SUB-R3.1.b. and SUB-R3.1.c.	<ul style="list-style-type: none"> <li>It is important to protect highly productive land while maintaining the existing rural character.</li> </ul>
278.19	Marunui Conservation Ltd	SUB-R3	Support	<b>RETAIN</b> SUB-R3.11 and SUB-R3.12.	<ul style="list-style-type: none"> <li>This status gives Council full discretion in its decision making.</li> </ul>
288.3	Strategic Property Limited as Development Manager of Mangawhai Central	SUB-R3	Support	<b>RETAIN</b> the discretionary activity status in SUB-R3.11 for subdivision in the Mangawhai/Hakaru Managed Growth Area overlay.	<ul style="list-style-type: none"> <li>This means Council have full discretion to assess new developments. This approach is preferable to the Operative District Plan provisions. This rule and activity status will ensure that all potential adverse effects are able to be considered by Kaipara District Council when assessing applications so subdivide land.</li> </ul>
308.47	Fire and Emergency New Zealand	SUB-R3	Support	<b>RETAIN</b> SUB-R3 as notified.	<ul style="list-style-type: none"> <li>Refer to submission for details. This rule is supported, subject to the relief sought elsewhere in relation to SUB-S5 in other submissions.</li> </ul>
315.48	Horizon Surveying & Land Development	SUB-R3	Support	<b>RETAIN</b> SUB-R3.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
330.76	New Zealand Transport Agency	SUB-R3	Support	<b>AMEND</b> SUB-R3.3. as follows: 5. Control is reserved over the following matters: a. to h. ... i. <u>Recommendations and proposed mitigation measures of an Integrated Transport Assessment and any further information provided through the consent process.</u> AND Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.	<ul style="list-style-type: none"> <li>Rule is supported, particularly as it applies to the General rural zone for creation of new allotments (to avoid ad hoc rural subdivision in locations where demand on the State Highway occurs without any coordination) and the elevation to discretionary activity status if non-compliance.</li> <li>Missing is the mechanism of preparing Integrated Transport Assessments as part of progressing a subdivision application pursuant to this rule.</li> <li>An additional matter of control is proposed to provide for recommendations and proposed mitigation measures from an Integrated Transport Assessment to be implemented.</li> </ul>
2.2	Loralie Sheppard	SUB-R4	Amend	<b>AMEND</b> SUB-R4 e as below:	<ul style="list-style-type: none"> <li>No allowance in the Subdivision rules for the exceptions provided under the National Policy</li> </ul>

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### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<p>e. <u>The land to be subdivided into the additional small lots is:</u></p> <p>i. <u>Not highly productive land (as determined by either the New Zealand Land Resource Inventory maps or a property scale site specific assessment Land Use Capability Classification prepared by a suitably qualified person); or</u></p> <p>ii. <u>Is highly productive land but has been determined an exception under clause 3.8 of the National Policy Statement for Highly Productive Land 2022 and amended August 2024.</u>  <u>(Highly productive land as determined by either the New Zealand Land Resource Inventory maps* or a property scale site specific assessment Land Use Capability Classification prepared by a suitably qualified person and accepted by Council); and</u></p> <p><u>* For the determination of whether or not a property or part thereof has highly productive land, it has been taken into consideration that the New Zealand Land Resource Inventory maps have a scale of 1 : 50,000, and that the minimum area that can be separately defined at their scale is 10 ha."</u></p>	Statement for Highly Productive Land 2022 and amended August 2024.
50.17	Evolve Planning and Landscape Architecture	SUB-R4	Amend	<p><b>AMEND</b> the activity status of SUB-R4 from Controlled to Restricted Discretionary or Discretionary.  AND  <b>ADD</b> assessment criteria to SUB-R4 in relation to character and amenity values.  AND  <b>DELETE</b> the title date from SUB-R4.  AND  <b>DELETE</b> the reference to Growth Area from SUB-R4.</p>	<ul style="list-style-type: none"> <li>The submitter opposes the wording of these rules as they are permissive and will result in poor development outcomes across the District within the General rural zone, Rural lifestyle zone and Outstanding Natural Landscape.</li> <li>When subdivisions are controlled there is no ability for a subdivision to be declined and the assessment criteria does not include any aspects related to the natural environment including ecology, landscape and the like.</li> <li>The environmental benefit type provision provides for the same number of lots as the general rule which provides no incentive to protect or restore any natural features.</li> <li>The title date reference provides no use and within the Operative Plan is not upheld.</li> <li>There is no provision to require the protection of Outstanding Natural Landscapes, Outstanding Natural Features or areas of Outstanding Natural Character at the time of subdivision which is contrary to Part II of the Resource Management Act and other high level national and regional planning documents.</li> </ul>
144.7	Pacific Coast Surveys Ltd	SUB-R4	Amend	<b>DELETE</b> SUB-R4.1.c.	<ul style="list-style-type: none"> <li>A large area of rurally zoned land in Mangawhai is overlaid by growth potential and should not be exempt from SUB-R4.</li> </ul>
211.3	B & I McClean	SUB-R4	Amend	<p><b>DELETE</b> SUB-R4.1.a.  OR  <b>AMEND</b> SUB-R4.1.a to recognise sites that existed prior to April 2025 and that may have been subject to a boundary relocation and hence have a newer title.</p>	<ul style="list-style-type: none"> <li>The submitter has requested the above as many farms in the district are held in multiple titles, and owners undertake boundary relocations to ensure best farm management. Undertaking a boundary adjustment would prevent the use of SUB-R4 as a controlled activity where land has been subject to boundary adjustment and has a newer title.</li> </ul>
212.27	BA & JK Paton Ltd	SUB-R4	Amend	<p><b>AMEND</b> SUB-R4 to simplify the formatting for clarity and ease of use.  AND  No specific decision requested, however the submission considers that SUB-R4.1 Controlled activity status paired with SUB-R4.1.d 4,000m<sup>2</sup> in the General rural zone risks incompatible activities, rural character diminishing, challenges for managing reverse sensitivity at rural-urban interfaces. Risk of inappropriate fragmentation of rural land creating a Rural lifestyle character, unless land in areas where fragmentation and Rural lifestyle character already exists.  AND  <b>RETAIN</b> SUB-R4.1.e that provides the option to provide a site-specific assessment LUC Classification.  AND  Any other relief that is consistent with and/or consequential to the submission.</p>	<ul style="list-style-type: none"> <li>The submitter requests the above relief without limiting the scope of the submission on the details in the SUB Standards, other Proposed District Plan chapters or maps, including scope to make further submissions on a variation to introduce updated Kaipara District Council Engineering Standards.</li> <li>SUB-R4 format is extensive and not user-friendly.</li> </ul>

## Proposed Kaipara District Plan

### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
213.4	Blue Sky Land Company Ltd	SUB-R4	Amend	<b>AMEND</b> the date referenced in SUB-R4.1.a to the operative date of the Proposed District Plan, not the current notification date. OR Alternative relief with similar effect.	<ul style="list-style-type: none"> <li>The Proposed District Plan rules do not have legal effect at the notification date so the restriction on the use of the small lot subdivision rule SUB-R4 should not apply until the rules have legal effect.</li> </ul>
217.70	Cato Bolam Consultants Limited	SUB-R4	Amend	<b>ADD</b> a policy framework that provides for an interim subdivision in the Mangawhai/Hakaru Managed Growth Area where infrastructure capacity is proven, alternatives are offered or development/financial contributions can resolve effects. AND <b>ADD</b> staging or triggers for releasing subdivision capacity in the Mangawhai/Hakaru Managed Growth Area. <b>AMEND</b> the formatting of SUB-R4 for clarity and ease of use. AND <b>RETAIN</b> SUB-R4.1.e that provides the option to provide a site-specific assessment for LUC classification. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps, including scope to make further submissions on a variation to introduce update Kaipara District Council Engineering Standards.</li> <li>SUB-R4.1 risks incompatible activities, reverse sensitivity, and a reduction in rural character.</li> <li>SUB-R4.1c 'freezes' subdivision capacity pending infrastructure upgrades but does not provide a timeline for how long this will occur.</li> <li>The format of this rule is extensive and not user friendly.</li> <li>There is a risk of inappropriate fragmentation and reduction of rural lifestyle character where this has not already occurred.</li> </ul>
249.4	Khans Developments and Investments Limited	SUB-R4	Amend	<b>AMEND</b> the date referenced in SUB-R4.1.a. to be the operative date of the Proposed District Plan, not the current notification date. OR Alternative relief with similar effect.	<ul style="list-style-type: none"> <li>The Proposed District Plan rules do not have legal effect at the notification date so the restriction on the use of the small lot subdivision rule SUB-R4 should not apply until the rules have legal effect.</li> </ul>
273.15	J Grigg	SUB-R4	Amend	<b>PROVIDE</b> policy framework that provides for interim subdivision in the Mangawhai/Hakaru Managed Growth Area where infrastructure capacity is proven, alternatives are offered, or development/financial contributions can resolve effects. This is in the context of SUB-R4. AND No specific decision requested; however the submission opposes SUB-R4.1.c which "freezes" subdivision capacity in the Mangawhai/Hakaru Managed Growth Area pending structure planning or infrastructure upgrades but does not commit to a timeline. AND <b>RETAIN</b> SUB-R4.1.e that provides the option to provide a site specific assessment LUC Classification. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter opposes SUB-R4.1(c) which freezes subdivision capacity in the Mangawhai/Hakaru Managed Growth Area pending structure planning or infrastructure upgrades but does not commit to a timeline.</li> <li>The submitter supports SUB-R4.1(e) that provides the option to provide a site specific assessment LUC classification.</li> </ul>
285.15	S & R Brunt	SUB-R4	Amend	No specific decision requested but submission opposes SUB-R4.1.c. AND <b>RETAIN</b> SUB-R4.1.e. AND <b>PROVIDE</b> a policy framework that provides for interim subdivision in the Mangawhai/Hakaru Managed Growth Area overlay where infrastructure capacity is proven, alternative is offered or development/financial contributions can resolve effects. AND <b>PROVIDE</b> identification of staging or triggers for releasing subdivision capacity in the Mangawhai/Hakaru Managed Growth Area overlay. AND Any other relief that is consistent with and/or consequential to this submission.	<ul style="list-style-type: none"> <li>Clause 1.c "freezes" subdivision capacity in the Mangawhai/Hakaru Managed Growth Area overlay but does not commit to a timeline.</li> <li>Clause 1.e is supported as it provides the option to provide a site-specific assessment of LUC Classification.</li> </ul>
291.16	Tovolea Farm Ltd	SUB-R4	Amend	<b>RETAIN</b> SUB-R4.1.e. AND <b>PROVIDE</b> a policy framework that provides for interim subdivision in the Mangawhai/Hakaru Managed Growth Area overlay where infrastructure capacity is proven, alternative are offered or development/financial contributions can resolve effects. AND	<ul style="list-style-type: none"> <li>Clause 1.b does not account for very large sites which would create more than five lots without losing rural amenity or productivity.</li> <li>Clause 1.c "freezes" subdivision capacity in the Mangawhai/Hakaru Managed Growth Area overlay but does not commit to a timeline.</li> <li>Clause 1.e is supported as it provides the option to provide a site-specific assessment of LUC Classification.</li> </ul>



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### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<p><b>PROVIDE</b> identification of staging or triggers for releasing subdivision capacity in the Mangawhai/Hakaru Managed Growth Area overlay.</p> <p>AND</p> <p>No specific decision requested; however the submission opposes SUB-R4.1.b limiting the number of lots created to 5.</p> <p>AND</p> <p>No specific decision requested; however the submission opposes SUB-R4.1.c freeze on subdivision capacity in the Mangawhai/Hakaru Managed Growth Area.</p> <p>AND</p> <p>Any other relief that is consistent with and/or consequential to this submission.</p>	
291.3	Tovolea Farm Ltd	SUB-R4	Amend	<p><b>AMEND</b> SUB-R4 to increase the number of lots able to be created and to apply inside the Mangawhai/Hakaru Managed Growth Area where criteria are met.</p> <p>AND</p> <p>any other relief that is consistent with and/or consequential to this submission.</p>	<ul style="list-style-type: none"> <li>Infrastructure efficiency - Kaiwaka Mangawhai Road and Lawrence Road that bound the submitter's land are already sealed and in good conditions and infrastructure can readily be upgraded in this location.</li> <li>Creating small lots from large sites would not lose productivity or lose rural character.</li> <li>The rezoning will still give effect to the National Policy Statement for Highly Productive Land and the Northland Regional Policy Statement.</li> <li>The rezoning will enable the submitter to provide for their economic and social wellbeing by providing reasonable subdivision pathways.</li> <li>The Mangawhai/Hakaru Managed Growth Area is a blunt tool with weak justification.</li> </ul>
315.49	Horizon Surveying & Land Development	SUB-R4	Amend	<p><b>AMEND</b> SUB-R4.1.b to limit subdivision to a maximum of two additional lots.</p> <p>AND</p> <p><b>AMEND</b> SUB-R4 activity status to Restricted Discretionary.</p> <p>AND</p> <p><b>ADD</b> assessment criteria to SUB-R4 requiring consideration of rural character, amenity values, and the existing development pattern of the surrounding area.</p>	<ul style="list-style-type: none"> <li>Enabling up to five additional allotments as a controlled activity risks promoting ad-hoc and ribbon development.</li> <li>Blanket provision does not adequately consider local context or surrounding development patterns.</li> <li>The rule as drafted may undermine rural character or overburden local infrastructure.</li> <li>More targeted effects-based approach is required.</li> </ul>
321.3	K Paler & M Paler-Jansen	SUB-R4	Amend	<p><b>AMEND</b> SUB-R4 to specifically exclude properties in areas within the Mangawhai/Hakaru Managed Growth Area that are already subdivided so that subdivision can match the existing development of those areas.</p> <p>AND</p> <p><b>AMEND</b> SUB-R4 to enable subdivision within the Mangawhai/Hakaru Managed Growth Area by enabling properties with existing rural lifestyle developments to comply with the subdivision requirements of the Rural lifestyle zone provisions (inferred).</p>	<ul style="list-style-type: none"> <li>Enabling subdivision in these areas will have minimal effects on physical infrastructure.</li> <li>Large parts of the Mangawhai/Hakaru Managed Growth Area consist of existing rural lifestyle properties. In these areas, the rule totally proscribes the subdivision of properties in a manner that matches the existing development of these areas.</li> </ul>
332.48	Northland Regional Council	SUB-R4	Amend	<p><b>AMEND</b> the activity status in SUB-R4 from controlled to discretionary or restricted discretionary.</p> <p>AND</p> <p><b>ADD</b> a new permitted activity condition to SUB-R4 to ensure proposed allotments can accommodate a building platform with a minimum setback from unsealed roads of 30m.</p>	<ul style="list-style-type: none"> <li>The provision for up to five small allotments to be created per record of title has the potential to adversely affect the integrity of the General rural zone and is inconsistent with SUB-O1.</li> <li>The submitter considers that subdivision at this scale could result in adverse effects on productive capacity due to fragmentation, reverse sensitivity effects and the loss of productive land. Moreover, that it could also lead to inefficient provision of infrastructure, particularly in regard to the transport network. It is submitted that the creation of 4,000m<sup>2</sup> lots will encourage fragmented residential and lifestyle development largely unrelated to rural activities, therefore needing to travel for work and school. Due to a lack of buffer area available, lots also have the potential to be impacted by dust nuisance from unsealed rural roads.</li> <li>The submitter makes particular note of Regional Policy Statement (RPS) Policy 5.1.3(a) which directs the avoidance of adverse effects from subdivision on primary production activities in primary production zones. It is also considered that SUB-R4 is inconsistent with Whangārei District Plan subdivision requirements which has a 20ha minimum site area. Such disparity could lead to cross-boundary effects and a distorted development pattern.</li> </ul>

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### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
					<ul style="list-style-type: none"> <li>The submitter points out that SUB-R4 provides for five allotments to be created without any requirement for ecological assessment or protection. This is inconsistent with RPS Objective 3.4 on indigenous ecosystems and biodiversity as it would result in less protection being afforded to significant areas.</li> <li>The amendments sought and reasons why are as follows:</li> <li>Amending the activity status to allow for all potential effects to be considered and applications declined if needed.</li> <li>Adding a condition requiring 30m setbacks from unsealed roads is the distance allowing for the settling of dust particles before they reach a dwelling and significantly reduce impacts on human health; and</li> <li>A new Subdivision policy is to support the implementation of the discretionary or restricted discretionary activity status, as well as ensure the matters raised above can be appropriately considered at the time of subdivision.</li> </ul>
352.1	M Tschirky	SUB-R4	Amend	<b>RETAIN</b> SUB-R4 AND Make plan changes in the Mangawhai/Hakaru Managed Growth Area non-compliant.	<ul style="list-style-type: none"> <li>Disallow any more intensified housing developments through plan changes.</li> </ul>
77.12	Richard (Rick) Ruiterman	SUB-R4	Oppose	<b>DELETE</b> SUB-R4 OR <b>AMEND</b> SUB-R4 to limit the parent lot size to 5ha.	<ul style="list-style-type: none"> <li>This rule seeks to fragment rural allotments with no limit on parent lot size.</li> <li>General rural areas are being allowed to be fragmented, in contradiction to the General Rural zone objectives.</li> </ul>
140.60	Horticulture New Zealand	SUB-R4	Oppose	<b>DELETE</b> SUB-R4. AND any consequential or alternative amendments required to address the concerns raised by the submitter.	<ul style="list-style-type: none"> <li>The submitter does not believe subdivision has a functional need to be located within the General rural zone, nor is it supported by the National Planning Standards.</li> <li>Subdivision being enabled within the GRUZ as a controlled activity is opposed.</li> </ul>
237.2	K P Dreadon Limited	SUB-R4	Oppose	<b>DELETE</b> SUB-R4 in its entirety and replace with a provision that enables small-lot subdivision only where it delivers equivalent or superior environmental benefit to that required under SUB-R6.	<ul style="list-style-type: none"> <li>SUB-R4 enables between 21,684 and 28,134 new lots (depending on HPL interpretation) with no environmental requirements. Even under the most conservative NPS-HPL application(excluding LUC 1-3), 4,866 titles yield 21,684 lots. Under probable 2025 NPS-HPL amendments (excluding LUC 1-2), 6,285 titles yield 28,134 lots. Analysis shows most properties yield maximum 5 lots, confirming SUB-R4 functions as blanket rural rezoning rather than controlled subdivision. This creates a perverse incentive that punishes environmental protection efforts (62% fewer opportunities under SUB-R6/R7).</li> </ul>
319.5	J Warden	SUB-R4	Oppose	<b>DELETE</b> SUB-R4 AND <b>ADD</b> the provisions from the Operative District Plan such as the Integrated Development Rule back into the Proposed District Plan.	<ul style="list-style-type: none"> <li>Providing for this type of subdivision as a controlled activity will provide for linear development and urban sprawl with no real requirements to address the effects on the environment.</li> <li>It seems at complete odds to restrict growth for example in the Mangawhai/Hakaru Managed Growth area yet provide for growth in 5 lot increments as a Controlled Activity within the surrounding General rural zone. It is nonsensical to have an incentivised provision such as SUB-R6 and SUB-R7 Environmental benefit subdivision which provides for a similar yield but requires much more consideration and cost to provide the same lot yield outcomes.</li> </ul>
126.4	Loralie Sheppard	SUB-R4	Support	<b>RETAIN</b> SUB-R4 Small lot subdivision.	<ul style="list-style-type: none"> <li>As a land survey company, the submitter generally supports subdivision rules.</li> </ul>
136.97	Federated Farmers of New Zealand (Inc) - Northland Province	SUB-R4	Support	<b>RETAIN</b> SUB-R4 as notified. OR With wording that achieves similar intent. AND Any consequential amendments.	<ul style="list-style-type: none"> <li>The submitter supports inclusion of policy CE-P2 as it enables appropriate development in the coastal environment. However, they would prefer the policy explicitly recognises and provides for rural land uses.</li> </ul>
165.3	TAP Adventures Ltd	SUB-R4	Support	<b>RETAIN</b> Rule SUB-R4 (note referencing error in submission) AND	<ul style="list-style-type: none"> <li>The intention of the rule needs to be clarified.</li> </ul>

## Proposed Kaipara District Plan

### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<b>AMEND</b> the subdivision objectives and policies to link to SUB-R4 and provide guidance for its implementation. OR <b>ADD</b> an objective or policy to link to SUB-R4 and provide guidance for its implementation.	<ul style="list-style-type: none"> <li>There needs to be a clear consenting pathway from the objectives and policies through to this rule.</li> <li>For example, an addition to SUB-O3 Rural subdivision and/or SUB-P8 Subdivision in the General rural zone outside the Mangawhai/Hakaru Managed Growth Area.</li> </ul>
257.19	Piroa Conservation Trust	SUB-R4	Support	<b>RETAIN</b> SUB-R4.1.c and SUB-R4.4.	<ul style="list-style-type: none"> <li>This will minimise fragmentation within the Growth Area and maintain a more open rural character and amenity and protect ONL 14 Bream Tail / Brynderwyn Ranges.</li> </ul>
257.29	Piroa Conservation Trust	SUB-R4	Support	<b>RETAIN</b> SUB-R4.1.c. AND <b>RETAIN</b> SUB-R4.4.	<ul style="list-style-type: none"> <li>This will minimise fragmentation within the Mangawhai/Hakaru Managed Growth Area and maintain a more open rural character and amenity. It will also serve to protect ONL14 Bream Tail / Brynderwyn Ranges which falls within the Mangawhai/Hakaru Managed Growth Area.</li> </ul>
272.21	J & C Hawley	SUB-R4	Support	<b>RETAIN</b> SUB-R4.1.c. as notified. AND <b>RETAIN</b> SUB-R4.4 as notified.	<ul style="list-style-type: none"> <li>To minimise fragmentation within the growth area and maintain a more open rural character and amenity.</li> <li>It will serve to protect ONL 14 Bream Tail / Brynderwyn Ranges which falls within the Mangawhai/Hakaru Managed Growth Area.</li> </ul>
278.20	Marunui Conservation Ltd	SUB-R4	Support	<b>RETAIN</b> SUB-R4.1.c. and SUB-R4.4.	<ul style="list-style-type: none"> <li>To minimise fragmentation within the growth area and maintain a more open rural character and amenity.</li> <li>It will serve to protect ONL 14 Bream Tail / Brynderwyn Ranges which falls within the Mangawhai/Hakaru Managed Growth Area.</li> </ul>
50.18	Evolve Planning and Landscape Architecture	SUB-R5	Amend	<b>AMEND</b> the activity status of SUB-R5 from Controlled to Restricted Discretionary or Discretionary. AND <b>ADD</b> assessment criteria to SUB-R5 in relation to character and amenity values.	<ul style="list-style-type: none"> <li>The submitter opposes the wording of these rules as they are permissive and will result in poor development outcomes across the District within the General rural zone, Rural lifestyle zone and Outstanding Natural Landscape.</li> <li>When subdivisions are controlled there is no ability for a subdivision to be declined and the assessment criteria does not include any aspects related to the natural environment including ecology, landscape and the like.</li> <li>The environmental benefit type provision provides for the same number of lots as the general rule which provides no incentive to protect or restore any natural features.</li> <li>The title date reference provides no use and within the Operative Plan is not upheld.</li> <li>There is no provision to require the protection of Outstanding Natural Landscapes, Outstanding Natural Features or areas of Outstanding Natural Character at the time of subdivision which is contrary to Part II of the Resource Management Act and other high level national and regional planning documents.</li> </ul>
212.28	BA & JK Paton Ltd	SUB-R5	Amend	<b>ADD</b> zone related criteria to SUB-R5 to specify the appropriate minimum lot size for different zones. AND <b>AMEND</b> the formatting of SUB-R5 to simplify for clarity and ease of use. AND No specific decision requested; however, the submission considers that SUB-R5.1.d 4,000m <sup>2</sup> in the General rural zone may be inappropriate fragmentation of rural land and creating a Rural lifestyle character. This does not contribute to avoiding incompatible activities and fragmentation of productive land or managing reverse sensitivity at rural-urban interfaces. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has requested the above relief without limiting the scope of the submission on the details in the SUB Standards, other Proposed District Plan chapters or maps.</li> <li>SUB-R5 format is extensive and not user-friendly.</li> </ul>
217.71	Cato Bolam Consultants Limited	SUB-R5	Amend	<b>ADD</b> zone related criteria to SUB-P5 to specify appropriate minimum lot sizes for different zones. AND <b>AMEND</b> the formatting of SUB-P5 to provide clarity and ease of use. AND	<ul style="list-style-type: none"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> <li>The submitter is of the opinion that by allowing 4000m<sup>2</sup> in the General rural zone through SUB-R5.1.d may result in inappropriate fragmentation of rural</li> </ul>

## Proposed Kaipara District Plan

### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>land, adversely affect rural lifestyle character, and result in reverse sensitivity at rural-urban interfaces.</li> <li>The format of this rule is extensive and not user friendly.</li> </ul>
140.61	Horticulture New Zealand	SUB-R5	Oppose	<b>DELETE</b> SUB-R5. AND any consequential or alternative amendments required to address the concerns raised by the submitter.	<ul style="list-style-type: none"> <li>Opposes the controlled activity status (i.e., where an application cannot be declined) and permissive approach to rural subdivision.</li> <li>The submitter supports a control over land being subdivided into environmentally beneficial lots where it is not highly productive (inferred); however, as highly productive land has not been mapped at a regional level, the spatial extent of productive land within Northland is not yet known. It is considered that SUB-R5 presents significant risk for primary production regardless of productive land status. Land does not have to be highly productive for primary production activities to occur.</li> <li>Referencing no-complaints covenants as a method to mitigate potential reverse sensitivity effects is not appropriate. Such covenants are ineffective mechanisms for effects which should be avoided.</li> <li>It is suggested that options to shift development capacity away from primary production areas is considered.</li> </ul>
126.5	Loralie Sheppard	SUB-R5	Support	<b>RETAIN</b> SUB-R5 Subdivision to create a reserve and incentive lot.	<ul style="list-style-type: none"> <li>As a land survey company, the submitter generally supports subdivision rules.</li> </ul>
136.98	Federated Farmers of New Zealand (Inc) - Northland Province	SUB-R5	Support	<b>RETAIN</b> SUB-R5 as notified. OR With wording that achieves a similar intent. AND Any consequential amendments.	<ul style="list-style-type: none"> <li>In principle the submitter supports an enabling approach for subdivision that will create a reserve and 'incentive lot'. However, assumptions as to what is meant by an 'incentive lot' have had to be made as the term is not defined (refer submission point 136.99). Further, the approach is not supported by an objective and policy structure that leads to a controlled activity rule as being an appropriate resource management response in this zone. A clear policy framework is essential to provide clear direction to resource users and decision-makers (refer submission points 136.99 and 136.100).</li> </ul>
267.17	Northland Fish and Game Council	SUB-R5	Support	<b>RETAIN</b> SUB-R5 as notified.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
50.19	Evolve Planning and Landscape Architecture	SUB-R6	Amend	<b>AMEND</b> the activity status of SUB-R6 from Controlled to Restricted Discretionary or Discretionary. AND <b>ADD</b> assessment criteria to SUB-R6 in relation to character and amenity values as well as ecological value. AND <b>DELETE</b> the title date from SUB-R6. AND <b>AMEND</b> SUB-R6 to provide for further lot entitlements to allow for further incentives. AND <b>AMEND</b> SUB-R6 to be more clearly drafted with ecological input.	<ul style="list-style-type: none"> <li>The submitter opposes the wording of these rules as they are permissive and will result in poor development outcomes across the District within the General rural zone, Rural lifestyle zone and Outstanding Natural Landscape.</li> <li>When subdivisions are controlled there is no ability for a subdivision to be declined and the assessment criteria does not include any aspects related to the natural environment including ecology, landscape and the like.</li> <li>The environmental benefit type provision provides for the same number of lots as the general rule which provides no incentive to protect or restore any natural features.</li> <li>The title date reference provides no use and within the Operative Plan is not upheld.</li> <li>There is no provision to require the protection of Outstanding Natural Landscapes, Outstanding Natural Features or areas of Outstanding Natural Character at the time of subdivision which is contrary to Part II of the Resource Management Act and other high level national and regional planning documents.</li> <li>The rule needs a re-write as it is confusing and hard to understand.</li> </ul>
125.1	Madara Vilde	SUB-R6	Amend	<b>AMEND</b> SUB-R6 Environmental Benefit Subdivision to: <ul style="list-style-type: none"> <li>Allow subdivision rights for revegetation and ecological restoration even where no existing significant vegetation exists.</li> <li>Broaden the scope of eligible environmental benefits.</li> <li>Provide more minimum site size flexibility.</li> </ul>	<ul style="list-style-type: none"> <li>Rule SUB-R6 focuses on protecting existing ecological values through subdivision, but does not encourage restoration of degraded sites, such as riparian buffers, wetlands, erosion-prone slopes.</li> <li>The changes would support long-term ecological resilience and sustainability of the District.</li> </ul>

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				<ul style="list-style-type: none"> <li>Reconsider the requirement for title to predate 28 April 2025.</li> <li>Require that ecological integrity is prioritised during platform placement and access development.</li> <li>Include clearer criteria to assess sustainability when using small or fragmented covenanted areas.</li> </ul> <p>Ensure ecological terms are clearly defined (see separate submission point).</p>	<ul style="list-style-type: none"> <li>The changes would align with the National Policy Statement for Indigenous Biodiversity and Essential Freshwater Package.</li> <li>See submission for further details.</li> </ul>
140.62	Horticulture New Zealand	SUB-R6	Amend	<p><b>AMEND</b> the activity status in SUB-R6 from controlled to restricted discretionary.</p> <p>AND</p> <p>No specific decision requested; however, the submission opposes the lack of assessment of reverse sensitivity effects in SUB-R6.</p> <p>AND</p> <p>No specific decision requested; however, the submission supports considering options (transferable titles) to shift development capacity away from areas of primary production.</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"> <li>The submitter supports the intent of this provision but opposes the activity status and lack of reverse sensitivity effects assessment.</li> <li>It is requested that options to shift development capacity from primary production areas (transferable titles) are considered.</li> </ul>
144.8	Pacific Coast Surveys Ltd	SUB-R6	Amend	<p><b>ADD</b> an Advice Note to SUB-R6 enabling any area of significant indigenous vegetation or habitat that does not meet the 0.5ha threshold under SUB-S16 to be made up by enhancement planting under SUB-R7 (inferred).</p>	<ul style="list-style-type: none"> <li>The submitter requests that Subdivision Rules 6 and 7 are integrated to enable the 0.5ha area threshold under Standard SUB-S16 to be met.</li> </ul>
211.4	B & I McClean	SUB-R6	Amend	<p><b>DELETE</b> SUB-R6.1.g.</p> <p>OR</p> <p><b>AMEND</b> SUB-R6.1.g to recognise sites that existed prior to April 2025 and that may have been subject to a boundary relocation and hence have a newer title.</p>	<ul style="list-style-type: none"> <li>The submitter has requested the above as many farms in the district are held in multiple titles, and owners undertake boundary relocations to ensure best farm management. Undertaking a boundary adjustment would prevent the use of SUB-R6 as a controlled activity where land has been subject to boundary adjustment and has a newer title.</li> </ul>
212.29	BA & JK Paton Ltd	SUB-R6	Amend	<p><b>AMEND</b> SUB-R6 to provide a higher yield as an incentive by means of transferable title rights to be used in Rural lifestyle zone.</p> <p>AND</p> <p><b>AMEND</b> the format of SUB-R6 to simplify for clarity and ease of use.</p> <p>AND</p> <p><b>AMEND</b> SUB-R6 to clarify if these are an additional 5 title rights (10 additional in total).</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"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> <li>SUB-R6 may be ineffective because SUB-R4 and SUB-R5 also offers 4,000m<sup>2</sup> minimum lot sizes meaning incentives are unattractive or unviable for landowners</li> <li>SUB-R6 format is extensive and not user-friendly.</li> <li>It is uncertain if the rule allows an additional 5 titles from SUB-R4, so 10 additional Lots in total.</li> </ul>
213.5	Blue Sky Land Company Ltd	SUB-R6	Amend	<p><b>AMEND</b> SUB-R6.1.f and g to read as follows:</p> <p>...</p> <p>f. All proposed new environmental <del>allotments</del> <u>benefit sites</u> are to have a minimum net site area (excluding access legs) of 4,000m<sup>2</sup>.</p> <p>g. The record of title to be subdivided must be dated prior to <del>28 April 2025</del> <u>[insert operative date]</u>.</p> <p>OR</p> <p>Alternative relief with similar effect.</p>	<ul style="list-style-type: none"> <li>The subdivision standards refer to both minimum 'allotment' area, and 'net site area' - both terms which have different meanings in accordance with the definitions section of the Proposed District Plan.</li> <li>The difference in terminology used within the rules causes confusion.</li> <li>The Proposed District Plan rules do not have legal effect at the notification date so the restriction on the use of SUB-R6 should not apply until the rules have legal effect.</li> </ul>
217.72	Cato Bolam Consultants Limited	SUB-R6	Amend	<p><b>PROVIDE</b> SUB-R6 to provide a higher yield as incentive by means of transferable title rights to be used in the Rural lifestyle zone.</p> <p>AND</p> <p><b>AMEND</b> SUB-R6 to simplify the formatting for clarity and ease of use.</p> <p>AND</p> <p><b>AMEND</b> SUB-R6 to clarify if 'these are an additional 5 titles'.</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"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> <li>SUB-R6 may be ineffective as SUB-R4 and R5 also offers 4,000m<sup>2</sup> minimum lot sizes which would result in incentives being unattractive or unviable for land owners.</li> <li>It is unclear if this rule allows for an additional 5 titles from SUB-R4, allowing 10 in total.</li> <li>The formatting of this rule is extensive and not user friendly.</li> </ul>
237.3	K P Dreadon Limited	SUB-R6	Amend	<p><b>AMEND</b> SUB-R6 to enable integration with mapped Offset Receiving Zones(ORZs), allow cross-boundary transfers, and</p>	<ul style="list-style-type: none"> <li>SUB-R6 provides a useful baseline for incentivising protection, but is currently underutilized due to</li> </ul>

## Proposed Kaipara District Plan

### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				increase yield where restoration or retirement exceeds the 0.5ha baseline threshold.	limited lot entitlements and lack of cross-boundary coordination.
249.5	Khans Developments and Investments Limited	SUB-R6	Amend	<p><b>AMEND</b> SUB-R6.1.f. and g. as follows:</p> <p>...</p> <p>f. All proposed new environmental <del>allotments</del> <u>benefit sites</u> are to have a minimum net site area (excluding access legs) of 4,000m<sup>2</sup>.</p> <p>g. The record of title to be subdivided must be dated prior to <del>28 April 2025</del> <u>[insert operative date]</u>.</p> <p>OR</p> <p>Alternative relief with similar effect.</p>	<ul style="list-style-type: none"> <li>The subdivision standards refer to both minimum 'allotment' area, and 'net site area' - both terms which have different meanings in accordance with the definitions section of the Proposed District Plan.</li> <li>The difference in terminology used within the rules causes confusion.</li> <li>The Proposed District Plan rules do not have legal effect at the notification date so the restriction on the use of SUB-R6 should not apply until the rules have legal effect.</li> </ul>
257.20	Piroa Conservation Trust	SUB-R6	Amend	<p><b>ADD</b> to SUB-R6 that "Environmental benefit lots are not available in Outstanding Natural Landscapes"</p> <p><b>AND</b></p> <p><b>AMEND</b> SUB-R6 so that Environmental benefit lots in Outstanding Natural Landscapes are a Prohibited Activity.</p> <p><b>AND</b></p> <p><b>AMEND</b> SUB-R6.1 as follows:</p> <p>1. <b>Activity status:</b> Controlled</p> <p><b>Where:</b></p> <p>Environmental benefit subdivision must comply with the following:</p> <p>a. SUB-S2 to SUB-S16;</p> <p>b. The significant indigenous vegetation or habitat, natural wetland or duneland to be protected must not be subject to <u>an existing</u> conservation covenant pursuant to the Reserves Act 1977; or the Queen Elizabeth II National Trust Act 1977; or consent notices;</p> <p>c. The subdivision will protect all areas of significant indigenous vegetation or habitat, natural wetland or duneland by way of a conservation covenant <u>in perpetuity</u> pursuant to the Reserves Act 1977; or the Queen Elizabeth II National Trust Act 1977; or consent notices;</p> <p>d. Each separate area of significant indigenous vegetation or habitat, natural wetland or duneland proposed to be covenanted must be assessed by a suitably qualified and experienced ecologist <del>as satisfying at least one against the</del> criteria in Appendix 5 of the Northland Regional Policy Statement (Criteria for determining significance of indigenous biodiversity);</p> <p>e. An ecological management plan is prepared to address the ongoing management of the covenanted area(s) to ensure that the values for which the area was covenanted are maintained. The ecological management plan must include:</p> <p>i. Fencing requirements for the covenanted area(s) including how the areas are excluded from stock intrusion;</p> <p>ii. Details of ongoing pest plant and animal control commitments; and</p> <p>iii. A planting plan showing any enhancement or edge planting required within the covenanted area(s) <u>(use of ecosourced plants is preferable)</u>; (inferred change)</p> <p><b>AND</b></p> <p><b>AMEND</b> SUB-R6.4 as follows:</p> <p><b>Activity status when compliance with SUB-R6.1.b-h not achieved:</b> <del>Discretionary Non-Complying</del></p> <p><b>AND</b></p> <p><b>RETAIN</b> 4,000m<sup>2</sup> net site area for new Environmental Benefit Lots.</p>	<ul style="list-style-type: none"> <li>No justification for granting Environmental benefit lots in Outstanding Natural Landscapes.</li> <li>Enabling the creation of multiple lots will degrade the quality and values of the Outstanding Natural Landscape.</li> </ul>
257.30	Piroa Conservation Trust	SUB-R6	Amend	<p><b>AMEND</b> SUB-R6 so that environmental benefit lots in Outstanding Natural Landscapes are a prohibited activity.</p>	<ul style="list-style-type: none"> <li>There is no justification for granting environmental benefit lots in an Outstanding Natural Landscape as it has already met the criteria for its classification of being Outstanding. Enabling the creation of multiple lots will degrade the quality and values of the Outstanding Natural Landscape.</li> </ul>



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### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
257.31	Piroa Conservation Trust	SUB-R6	Amend	<p><b>AMEND</b> SUB-R6.1. as follows:</p> <p>1. <b>Activity status:</b> Controlled</p> <p><b>Where:</b> Environmental benefit subdivision must comply with the following:</p> <ol style="list-style-type: none"> <li>SUB-S2 to SUB-S16;</li> <li>The significant indigenous vegetation or habitat, natural wetland or duneland to be protected must not be subject to an <u>existing</u> conservation covenant pursuant to the Reserves Act 1977; or the Queen Elizabeth II National Trust Act 1977; or consent notices.</li> <li>The subdivision will protect all areas of significant indigenous vegetation or habitat, natural wetland or duneland by way of a conservation covenant in <u>perpetuity</u> pursuant to the Reserves Act 1977; or the Queen Elizabeth II National Trust Act 1977; or consent notices;</li> <li>Each separate area of significant indigenous vegetation or habitat, natural wetland or duneland proposed to be covenanted must be assessed by a suitably qualified and experienced ecologist <del>as satisfying at least one against the</del> criteria in Appendix 5 of the Northland Regional Policy Statement (Criteria for determining significance of indigenous biodiversity);</li> <li>An ecological management plan is prepared to address the ongoing management of the covenanted area(s) to ensure that the values for which the area was covenanted are maintained. The ecological management plan must include: <ol style="list-style-type: none"> <li>Fencing requirements for the covenanted area(s) including how the areas are excluded from stock intrusion;</li> <li>Details of ongoing pest plant and animal control commitments; and</li> <li>A planting plan showing any enhancement or edge planting required within the covenanted area(s) (<u>use of eco sourced plants is preferable</u>); (inferred change)</li> </ol> </li> </ol> <p>AND</p> <p><b>AMEND</b> SUB-R6.4 as follows:</p> <p><b>Activity status when compliance with SUB-R6.1.b-h not achieved:</b> <del>Discretionary</del> Non-Complying</p> <p>AND</p> <p><b>RETAIN</b> 4,000m<sup>2</sup> net site area for new Environmental Benefit Lots.</p>	<ul style="list-style-type: none"> <li>No justification for granting Environmental benefit lots in Outstanding Natural Landscapes.</li> <li>Enabling the creation of multiple lots will degrade the quality and values of the Outstanding Natural Landscape.</li> <li>Under the controlled activity status, an environmental benefit must be granted consent if it complies with clauses SUB-R6.a. to h. If it cannot comply with SUB-S2 to SUB-S15 then it becomes Discretionary.</li> <li>Similarly, if it cannot comply with SUB-R6.1.b. to h. it also becomes Discretionary. This is too liberal.</li> <li>These are vital requirements which will determine the success of the environmental activity in the area to be protected.</li> </ul>
272.22	J & C Hawley	SUB-R6	Amend	<p><b>AMEND</b> SUB-R6 so that Environmental benefit lots in Outstanding Natural Landscapes are a prohibited activity.</p>	<ul style="list-style-type: none"> <li>There is no justification for granting Environmental benefit lots in an Outstanding Natural Landscape as it has already met the criteria for its classification as being Outstanding.</li> <li>Enabling the creation of multiple lots will degrade the quality and values of the Outstanding Natural Landscape</li> </ul>
272.34	J & C Hawley	SUB-R6	Amend	<p><b>AMEND</b> SUB-R6.1 as follows:</p> <p>1. <b>Activity status:</b> Controlled</p> <p><b>Where:</b> Environmental benefit subdivision must comply with the following:</p> <ol style="list-style-type: none"> <li>SUB-S2 to SUB-S16;</li> <li>The significant indigenous vegetation or habitat, natural wetland or duneland to be protected must not be subject to an <u>existing</u> conservation covenant pursuant to the Reserves Act 1977; or the Queen Elizabeth II National Trust Act 1977; or consent notices;</li> <li>The subdivision will protect all areas of significant indigenous vegetation or habitat, natural wetland or duneland by way of a conservation covenant in <u>perpetuity</u> pursuant to the Reserves Act 1977; or the Queen Elizabeth II National Trust Act 1977; or consent notices;</li> </ol>	<ul style="list-style-type: none"> <li>No justification for granting Environmental Benefit Lots in Outstanding Natural Landscapes.</li> <li>Enabling the creation of multiple lots will degrade the quality and values of the Outstanding Natural Landscape.</li> </ul>

## Proposed Kaipara District Plan Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<p>d. Each separate area of significant indigenous vegetation or habitat, natural wetland or duneland proposed to be covenanted must be assessed by a suitably qualified and experienced ecologist <del>as satisfying at least one against the</del> criteria in Appendix 5 of the Northland Regional Policy Statement (Criteria for determining significance of indigenous biodiversity);</p> <p>e. An ecological management plan is prepared to address the ongoing management of the covenanted area(s) to ensure that the values for which the area was covenanted are maintained. The ecological management plan must include:</p> <ul style="list-style-type: none"> <li>i. Fencing requirements for the covenanted area(s) including how the areas are excluded from stock intrusion;</li> <li>ii. Details of ongoing pest plant and animal control commitments; and</li> <li>iii. A planting plan showing any enhancement or edge planting required within the covenanted area(s) <u>(use of ecosourced plants is preferable)</u>; (inferred change)</li> </ul> <p>AND</p> <p><b>AMEND</b> SUB-R6.4. as follows:</p> <p><b>Activity status when compliance with SUB-R6.1.b-h not achieved:</b> <del>Discretionary</del> <u>Non-Complying</u></p> <p>AND</p> <p><b>RETAIN</b> 4,000m<sup>2</sup> net site area for new Environmental Benefit Lots.</p>	
278.21	Marunui Conservation Ltd	SUB-R6	Amend	<b>AMEND</b> SUB-R6 so that Environmental benefit lots in Outstanding Natural Landscapes are a prohibited activity.	<ul style="list-style-type: none"> <li>There is no justification for granting Environmental benefit lots in Outstanding Natural Landscapes as it has already met the criteria for its classification as being Outstanding.</li> <li>Enabling the creation of multiple lots will degrade the quality and values of the Outstanding Natural Landscape</li> </ul>
278.33	Marunui Conservation Ltd	SUB-R6	Amend	<p><b>AMEND</b> SUB-R6.1 as follows:</p> <p><b>1. Activity status:</b> Controlled</p> <p><b>Where:</b></p> <p>Environmental benefit subdivision must comply with the following:</p> <ul style="list-style-type: none"> <li>a. SUB-S2 to SUB-S16;</li> <li>b. The significant indigenous vegetation or habitat, natural wetland or duneland to be protected must not be subject to <del>an existing</del> conservation covenant pursuant to the Reserves Act 1977; or the Queen Elizabeth II National Trust Act 1977; or consent notices;</li> <li>c. The subdivision will protect all areas of significant indigenous vegetation or habitat, natural wetland or duneland by way of a conservation covenant <u>in perpetuity</u> pursuant to the Reserves Act 1977; or the Queen Elizabeth II National Trust Act 1977; or consent notices;</li> <li>d. Each separate area of significant indigenous vegetation or habitat, natural wetland or duneland proposed to be covenanted must be assessed by a suitably qualified and experienced ecologist <del>as satisfying at least one against the</del> criteria in Appendix 5 of the Northland Regional Policy Statement (Criteria for determining significance of indigenous biodiversity);</li> <li>e. An ecological management plan is prepared to address the ongoing management of the covenanted area(s) to ensure that the values for which the area was covenanted are maintained. The ecological management plan must include: <ul style="list-style-type: none"> <li>i. Fencing requirements for the covenanted area(s) including how the areas are excluded from stock intrusion;</li> <li>ii. Details of ongoing pest plant and animal control commitments; and</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>No justification for granting Environmental benefit lots in Outstanding Natural Landscapes.</li> <li>Enabling the creation of multiple lots will degrade the quality and values of the Outstanding Natural Landscape.</li> </ul>

## Proposed Kaipara District Plan Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<p>iii. A planting plan showing any enhancement or edge planting required within the covenanted area(s) (<u>use of ecosourced plants is preferable</u>); (inferred change)</p> <p>AND</p> <p><b>AMEND</b> the activity status of SUB-R6.4 as follows: <b>Activity status when compliance with SUB-R6.1.b.-h. not achieved: Discretionary-Non-Complying</b></p> <p>AND</p> <p><b>RETAIN</b> 4,000m<sup>2</sup> net site area for new Environmental Benefit Lots.</p>	
304.100	Director General of Conservation	SUB-R6	Amend	<p><b>AMEND</b> SUB-R6.1.b. as follows:</p> <p>b. The significant indigenous vegetation or habitat, natural wetland or duneland to be protected must not be subject to an <u>existing</u> conservation covenant pursuant to the Reserves Act 1977; or the Queen Elizabeth II National Trust Act 1977; or consent notices;</p> <p>AND</p> <p><b>AMEND</b> SUB-R6.2. to provide for the management of cats and dogs in areas where Kiwi and present, and for weed and pest management.</p> <p>AND</p> <p><b>AMEND</b> SUB-R6 to include the rules in Biosecurity (National PA Pest Management Plan) Order 2022.</p> <p>AND</p> <p>Any further or alternative relief to like effect to that sought.</p>	<ul style="list-style-type: none"> <li>SUB-R6.1.b. should relate to an existing conservation covenant and SUB-R6.2. fails to limit cats and dogs in areas where Kiwi are present. Moreover, the weed and pest management provisions do not provide for Kauri Dieback.</li> <li>The submitter considers SUB-R6 requires amendment to include the rules in Biosecurity (National PA Pest Management Plan) Order 2022 (SL 2022/208) (as at 23 December 2023).</li> </ul>
315.50	Horizon Surveying & Land Development	SUB-R6	Amend	<p><b>AMEND</b> the activity status of SUB-R6 from Controlled to Restricted Discretionary.</p> <p>AND</p> <p><b>AMEND</b> SUB-R6 by replacing the consent notice mechanism with more robust mechanisms such as legal covenants or protection secured through consent conditions supported by ecological management plans.</p> <p>AND</p> <p><b>AMEND</b> reference to "all areas" in SUB-R6.1.c and "the land" in SUB-R6.1.h and any other ambiguous terms in SUB-R6 to more specific terms (inferred).</p> <p>AND</p> <p><b>DELETE</b> the ecological management plan requirements from subdivision application requirements.</p>	<ul style="list-style-type: none"> <li>Activity status is too permissive. Restricted Discretionary activity status will enable better oversight of subdivision proposals.</li> <li>Covenants would provide a more robust protection mechanism.</li> <li>Wording in 1.c and 1.h is too vague and open to interpretation, creating uncertainty in plan implementation.</li> <li>Requiring an ecological management plan as part of the subdivision application is unnecessary and should be addressed as a post-consent condition.</li> </ul>
319.6	J Warden	SUB-R6	Amend	<p><b>AMEND</b> the activity status of SUB-R6 from Controlled to Restricted Discretionary with associated matters of discretion.</p> <p>AND</p> <p><b>AMEND</b> SUB-R6.1.b. as follows:</p> <p>The significant <u>indigenous vegetation</u> or habitat, natural <u>wetland</u> or duneland to be protected must not be subject to a conservation covenant pursuant to the Reserves Act 1977; or the Queen Elizabeth II National Trust Act 1977; <u>or consent notices</u>;</p> <p>AND</p> <p><b>ADD</b> the Operative District Plan provisions which provide for Environmental Benefits such as the Integrated Development Rule back into the Proposed District Plan.</p> <p>AND</p> <p><b>RETAIN</b> requirement in SUB-R6 to be assessed by a suitably qualified and experienced ecologist.</p> <p>AND</p> <p><b>RETAIN</b> inclusion of an assessment of Appendix 5 of the Northland Regional Policy Statement in SUB-R6.</p>	<ul style="list-style-type: none"> <li>No subdivision in the rural zone should be a controlled activity.</li> <li>Good environmental outcomes can and have been achieved through the inclusion of consent notice areas where the proposed consent notice is incorporated into a conservation covenant and subject to more stringent consent conditions and management.</li> </ul>
334.2	Native Forest Restoration Trust	SUB-R6	Amend	<p><b>AMEND</b> SUB-R6.1.b., and c. to allow for an Environmental Benefit Subdivision to be made as a controlled activity where landowners have already legally protected significant natural area, or restoration area via a conservation covenant pursuant to the Reserves Act 1977, or the Queen Elizabeth II National Trust Act 1977, with no obligation to do so or material benefit to themselves.</p> <p>and</p>	<ul style="list-style-type: none"> <li>The submitter has requested the above relief for the following reasons:</li> <li>Currently, the Proposed District Plan provides for Environmental Benefit Subdivisions to be applied for as a controlled activity only where no existing conservation covenants or consent notices exist.</li> <li>The proposed rule as it stands gives no recognition to landowners who have already voluntarily legally</li> </ul>

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### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<b>AMEND</b> objectives, policies and rules as appropriate in order to implement the above provision.	protected their significant natural areas) as is the case with the Native Forests Restoration Trust reserves.
126.6	Loralie Sheppard	SUB-R6	Support	<b>RETAIN</b> SUB-R6 Environmental benefit subdivision.	<ul style="list-style-type: none"> <li>As a land survey company, the submitter generally supports subdivision rules.</li> </ul>
136.101	Federated Farmers of New Zealand (Inc) - Northland Province	SUB-R6	Support	<b>RETAIN</b> SUB-R6 as notified. OR With wording that achieves a similar intent. AND Any consequential amendments.	<ul style="list-style-type: none"> <li>The submitter supports an enabling approach for subdivision that will create 'environmental benefit'. However, assumptions have had to be made as to what is meant by 'environmental benefit' subdivision is as it is not defined (refer submission point 136.102). Further, the approach is not supported by an objective and policy structure that leads to a controlled activity rule as being an appropriate resource management response in this zone. A clear policy framework is essential to provide clear direction to resource users and decision-makers (refer submission 136.103).</li> </ul>
267.18	Northland Fish and Game Council	SUB-R6	Support	<b>RETAIN</b> SUB-R6 as notified.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
2.3	Loralie Sheppard	SUB-R7	Amend	<b>AMEND</b> Provision SUB-R7.1.g as follows: g. <del>The land to be subdivided into the environmental benefit lots is:</del> i. <del>Not highly productive land (as determined by either the New Zealand Land Resource Inventory maps or a property scale site specific assessment Land Use Capability Classification prepared by a suitably qualified person; or</del> ii. <del>Is highly productive land but has been determined an exception under clause 3.8 of the National Policy Statement for Highly Productive Land 2022 and amended August 2024.</del> (Highly productive land as determined by either the New Zealand Land Resource Inventory maps* or a property scale site specific assessment Land Use Capability Classification prepared by a suitably qualified person and accepted by Council); and * For the determination of whether or not a property or part thereof has highly productive land, it has been taken into consideration that the New Zealand Land Resource Inventory maps have a scale of 1 : 50,000, and that the minimum area that can be separately defined at their scale is 10 ha".	<ul style="list-style-type: none"> <li>No allowance in the Subdivision rules for the exceptions provided under the National Policy Statement for Highly Productive Land 2022 and amended August 2024.</li> </ul>
2.4	Loralie Sheppard	SUB-R7	Amend	<b>AMEND</b> SUB-R7.1.h (note possible referencing error) as follows: g. <del>The land to be subdivided into the environmental benefit lots is</del> i. <del>Not highly productive land (as determined by either the New Zealand Land Resource Inventory maps or a property scale site specific assessment Land Use Capability Classification prepared by a suitably qualified person; or</del> ii. <del>is highly productive land but has been determined an exception under clause 3.8 of the National Policy Statement for Highly Productive Land 2022 and amended August 2024.</del> (Highly productive land as determined by either the New Zealand Land Resource Inventory maps* or a property scale site specific assessment Land Use Capability Classification prepared by a suitably qualified person and accepted by Council); and * For the determination of whether or not a property or part thereof has highly productive land, it has been taken into consideration that the New Zealand Land Resource Inventory maps have a scale of 1 : 50,000, and that the minimum area that can be separately defined at their scale is 10 ha."	<ul style="list-style-type: none"> <li>No allowance in the Subdivision rules for the exceptions provided under the National Policy Statement for Highly Productive Land 2022 and amended August 2024.</li> </ul>
50.20	Evolve Planning and Landscape Architecture	SUB-R7	Amend	<b>AMEND</b> the wording of SUB-R7 to be clearer and with ecological and landscape architect input. AND <b>DELETE</b> the title date from SUB-R7. AND	<ul style="list-style-type: none"> <li>The submitter opposes the wording of these rules as they are permissive and will result in poor development outcomes across the District within the General rural zone, Rural lifestyle zone and Outstanding Natural Landscape.</li> </ul>

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### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<p><b>AMEND</b> the activity status of SUB-R7 from Controlled to Restricted Discretionary.</p> <p>AND</p> <p><b>ADD</b> assessment criteria to SUB-R7 in relation to character and amenity values as well as ecological value.</p>	<ul style="list-style-type: none"> <li>When subdivisions are controlled there is no ability for a subdivision to be declined and the assessment criteria does not include any aspects related to the natural environment including ecology, landscape and the like.</li> <li>The environmental benefit type provision provides for the same number of lots as the general rule which provides no incentive to protect or restore any natural features.</li> <li>The title date reference provides no use and within the Operative Plan is not upheld.</li> <li>There is no provision to require the protection of Outstanding Natural Landscapes, Outstanding Natural Features or areas of Outstanding Natural Character at the time of subdivision which is contrary to Part II of the Resource Management Act and other high level national and regional planning documents.</li> <li>Rule is confusing and hard to understand.</li> </ul>
125.2	Madara Vilde	SUB-R7	Amend	<p><b>AMEND</b> SUB-R7 to allow for restoration or enhancement planting to be undertaken as a condition of subdivision consent, rather than requiring planting to be completed and maintained for 12 months prior to lodgement of the application.</p>	<ul style="list-style-type: none"> <li>Current drafting of SUB-R7 is complex, difficult to enforce and risks creating perverse outcomes.</li> <li>The extensive requirements are a barrier for participation in restoration.</li> <li>Verifying compliance will be subjective and complicated.</li> <li>The requirement to complete and maintain restoration for 12 months prior to lodging a consent application is financially and procedurally risky for landowners.</li> <li>See submission for further details.</li> </ul>
140.63	Horticulture New Zealand	SUB-R7	Amend	<p><b>AMEND</b> SUB-R7 to include an assessment of reverse sensitivity effects.</p> <p>AND</p> <p>No specific decision requested; however, the submission supports considering options (transferable titles) to shift development capacity away from areas of primary production.</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"> <li>The submitter supports a control for land being subdivided into environmental benefit lots if not highly productive land but opposes the lack of reverse sensitivity effects assessment.</li> <li>It is requested that options to shift development capacity from primary production areas (transferable titles) are considered.</li> </ul>
211.5	B & I McClean	SUB-R7	Amend	<p><b>DELETE</b> SUB-R7.1.f.</p> <p>OR</p> <p><b>AMEND</b> SUB-R7.1.f to recognise sites that existed prior to April 2025 and that may have been subject to a boundary relocation and hence have a newer title.</p>	<ul style="list-style-type: none"> <li>The submitter has requested the above as many farms in the district are held in multiple titles, and owners undertake boundary relocations to ensure best farm management. Undertaking a boundary adjustment would prevent the use of SUB-R7 as a restricted discretionary activity where land has been subject to boundary adjustment and has a newer title.</li> </ul>
212.30	BA & JK Paton Ltd	SUB-R7	Amend	<p><b>AMEND</b> SUB-R7 to provide a higher yield as an incentive by means of transferable title rights to be used in Rural lifestyle zone. SUB-R7 will be ineffective because SUB-R4 and SUB-R5 also offers 4,000m<sup>2</sup> minimum lot sizes meaning the incentives are unattractive or unviable for landowners.</p> <p>AND</p> <p><b>AMEND</b> the formatting of SUB-R7 to simplify for clarity and ease of use.</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"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> <li>SUB-R7 format is extensive and not user-friendly.</li> </ul>
217.73	Cato Bolam Consultants Limited	SUB-R7	Amend	<p><b>AMEND</b> SUB-R7 to provide a higher yield as an incentive by means of transferable rights to be used in the Rural lifestyle zone.</p> <p>AND</p> <p><b>AMEND</b> SUB-R7 to simplify formatting for clarity and ease of use.</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"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> <li>SUB-R7 will be ineffective as SUB-R4 and SUB-R5 also offer a 4,000m<sup>2</sup> minimum lot size, meaning the incentives available are unattractive or unviable for landowners.</li> <li>The format of rule SUB-R7 is extensive and not user-friendly.</li> </ul>
222.42	Kaipara District Council	SUB-R7	Amend	<p><b>AMEND</b> Rule SUB-R7 to include reference to compliance with SUB-S2 – S15.</p>	<ul style="list-style-type: none"> <li>Rule SUB-R7 needs to include reference to SUB-S2 – S15, similar to SUB-R6.</li> </ul>

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### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
237.4	K P Dreadon Limited	SUB-R7	Amend	<b>AMEND</b> SUB-R7 to: <ul style="list-style-type: none"> <li>Clarify the status as Restricted Discretionary.</li> <li>Link assessment criteria directly to Offset Management Plan certification.</li> <li>Add reference to SUB-S17 ecological thresholds and SUB-S20 compliance pathway.</li> </ul>	<ul style="list-style-type: none"> <li>SUB-R7 is a sound starting point for enabling restoration-based subdivision but lacks clarity and structure for practical implementation.</li> </ul>
272.23	J & C Hawley	SUB-R7	Amend	<b>AMEND</b> the activity status of SUB-R7.1. from a Restricted Discretionary to a <u>Discretionary</u> activity status. AND <b>AMEND</b> the activity status of SUB-R7.3 from Discretionary to <u>Non-Complying</u> .	<ul style="list-style-type: none"> <li>Apart from requiring proof that planting has been undertaken and has survived for at least 12 months before an application can be made there seems to be no requirement for ongoing monitoring or reporting thereafter.</li> </ul>
278.22	Marunui Conservation Ltd	SUB-R7	Amend	<b>AMEND</b> the activity status of SUB-R7.1 from a Restricted Discretionary to Discretionary activity status. AND <b>AMEND</b> the activity status of SUB-R7.3 from Discretionary to Non-Complying.	<ul style="list-style-type: none"> <li>Apart from requiring proof that planting has been undertaken and has survived for at least 12 months before an application can be made there seems to be no requirement for ongoing monitoring or reporting thereafter</li> </ul>
304.101	Director General of Conservation	SUB-R7	Amend	<b>AMEND</b> SUB-R7 to include cats, dogs, weed and pest management in the assessment criteria. AND Any further or alternative relief to like effect to that sought.	<ul style="list-style-type: none"> <li>As drafted, the assessment criteria does not provide for the management of cats and dogs in areas where Kiwi or other significant avifauna species are present. Nor does it provide for weed and pest management.</li> </ul>
315.51	Horizon Surveying & Land Development	SUB-R7	Amend	<b>AMEND</b> the activity status of SUB-R7 from Controlled to Restricted Discretionary. AND <b>AMEND</b> SUB-R7 by replacing the consent notice mechanism with more robust mechanisms such as legal covenants or protection secured through consent conditions supported by ecological management plans. AND <b>AMEND</b> reference to "all areas" in SUB-R7.1.b and "the land" in SUB-R7.1.g and any other ambiguous terms in SUB-R7 to more specific terms (inferred). AND <b>DELETE</b> the ecological management plan requirements from subdivision application requirements.	<ul style="list-style-type: none"> <li>Activity status is too permissive. Restricted Discretionary activity status will enable better oversight of subdivision proposals.</li> <li>Covenants would provide a more robust protection mechanism.</li> <li>Wording in 1.c and 1.g is too vague and open to interpretation, creating uncertainty in plan implementation.</li> <li>Requiring an ecological management plan as part of the subdivision application is unnecessary and should be addressed as a post-consent condition.</li> </ul>
319.8	J Warden	SUB-R7	Amend	<b>AMEND</b> SUB-R7.1.d.iii, as follows: d. iii. A planting plan showing any enhancement or edge planting required within the covenanted area(s), and evidence that the planting plan has been implemented for a minimum period of 12 months for the feature being restored or enhanced prior to a <del>s224c application-subdivision under this rule</del> being made to Council.	<ul style="list-style-type: none"> <li>Submitter considers the wording is confusing and poorly conveyed.</li> </ul>
334.3	Native Forest Restoration Trust	SUB-R7	Amend	<b>AMEND</b> SUB-R7.1.a. and b to allow for an Environmental Benefit Subdivision to be made as a restricted discretionary activity where landowners have already legally protected significant natural area, or restoration area via a conservation covenant pursuant to the Reserves Act 1977, or the Queen Elizabeth II National Trust Act 1977, with no obligation to do so or material benefit to themselves. and <b>AMEND</b> objectives, policies and rules as appropriate in order to implement the above provision.	<ul style="list-style-type: none"> <li>The submitter has requested the above relief for the following reasons:</li> <li>Currently, the Proposed District Plan provides for Environmental Benefit Subdivisions to be applied for as a controlled activity only where no existing conservation covenants or consent notices exist.</li> <li>The proposed rule as it stands gives no recognition to landowners who have already voluntarily legally protected their significant natural areas) as is the case with the Native Forests Restoration Trust reserves.</li> </ul>
334.5	Native Forest Restoration Trust	SUB-R7	Amend	<b>AMEND</b> SUB-R7 to adopt a Restricted Discretionary activity status for Environmental Benefit subdivision in situations where indigenous revegetation and wetland restoration has been undertaken to reinstate these features on an area of General rural land which has no existing native vegetation or natural wetland, subject to conditions. OR <b>ADD</b> a new rule for a Restricted Discretionary activity for Environmental Benefit subdivision in situations where indigenous revegetation and wetland restoration has been undertaken to reinstate these features on an area of General rural land which has no existing native vegetation or natural wetland, subject to conditions. and <b>AMEND</b> objectives, policies and rules as appropriate in order to implement the above provision.	<ul style="list-style-type: none"> <li>The submitter has requested the above relief for the following reasons:</li> <li>Revegetation or enhancement planting on an area of General Rural Land which has no existing native vegetation or natural wetland, should be eligible for environmental subdivision as a Restricted Discretionary Activity subject to similar conditions in SUB-R7.</li> <li>Successful restoration work in the form of revegetation and enhancement should result in landowners being incentivised and rewarded.</li> </ul>



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### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
126.7	Loralie Sheppard	SUB-R7	Support	<b>RETAIN</b> SUB-R7 Restoration or enhancement planting.	<ul style="list-style-type: none"> <li>As a land survey company, the submitter generally supports subdivision rules.</li> </ul>
267.19	Northland Fish and Game Council	SUB-R7	Support	<b>RETAIN</b> SUB-R7 as notified.	<ul style="list-style-type: none"> <li>Expanding the roles of Benefit Lots is a straightforward way for the Council to meet its obligations under the Northland Regional Policy Statement using existing tools.</li> </ul>
126.8	Loralie Sheppard	SUB-R8	Support	<b>RETAIN</b> SUB-R8 Subdivision of land within Open space zones and Māori purpose zones.	<ul style="list-style-type: none"> <li>As a land survey company, the submitter generally supports subdivision rules.</li> </ul>
217.74	Cato Bolam Consultants Limited	SUB-R9	Amend	<p><b>PROVIDE</b> certainty for SUB-R9 by means of clear policy direction.</p> <p>AND</p> <p><b>AMEND</b> SUB-R9 to clarify whether a site created by subdividing a minor residential unit can also have a main residential unit.</p> <p>AND</p> <p>No specific decision requested; but the submission considers that SUB-R9.1. Discretionary activity status creates uncertainty regarding performance standards and/or assessment criteria.</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"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> <li>SUB-R9.1 creates uncertainty regarding performance standards and/or assessment criteria.</li> <li>There is uncertainty whether a site created by subdividing a minor residential unit can also have a main residential unit.</li> <li>There is no supporting objective or policy to clarify direction.</li> </ul>
217.75	Cato Bolam Consultants Limited	SUB-R9	Amend	<p>No specific decision requested; however the submission considers that there is no supporting objective or policy to clarify direction in SUB-R9.3.</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"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.</li> <li>In addition, the submitter has requested the above as they believe there is no supporting objective or policy to clarify direction for SUB-R9.3.</li> </ul>
315.52	Horizon Surveying & Land Development	SUB-R9	Amend	<b>AMEND</b> the activity status for subdivision of minor residential units a Discretionary Activity in all zones.	<ul style="list-style-type: none"> <li>Activity status for subdivision of minor residential units in SUB-R9 should be consistent.</li> </ul>
136.104	Federated Farmers of New Zealand (Inc) - Northland Province	SUB-R9	Oppose	<p><b>AMEND</b> GRUZ-R9 General rural zone/Rural lifestyle zone from Non-complying to Discretionary where that subdivision does not have significant adverse effects on the productive capacity of the land the minor unit is located upon.</p> <p>AND</p> <p>Any consequential amendments.</p>	<ul style="list-style-type: none"> <li>The submitter queries why the activity of subdividing minor residential units is non-complying in the General rural zone and Rural lifestyle zone. While understanding that the primary production capacity of the rural zone needs to be protected, there needs to be a path that allows landowners to subdivide off minor residential units where that capacity will not be adversely affected.</li> </ul>
126.9	Loralie Sheppard	SUB-R9	Support	<b>RETAIN</b> SUB-R9 Subdivision of minor residential units.	<ul style="list-style-type: none"> <li>As a land survey company, the submitter generally supports subdivision rules.</li> </ul>
79.2	Christopher Rea	SUB-S1		<b>RETAIN</b> SUB-S1 Minimum allotment sizes (excluding access legs) of 4000m <sup>2</sup> for Rural lifestyle zone.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
245.21	C & R Williamson	SUB-S1		<p><b>RETAIN</b> SUB-S1.</p> <p>AND</p> <p>Any further necessary consequential amendments required.</p>	<ul style="list-style-type: none"> <li>The minimum net site area for the Light industrial zone is supported as efficient and effective use of physical resources with integrated development with infrastructure.</li> </ul>
40.1	Glen Lewis	SUB-S1	Amend	<b>AMEND</b> SUB-S1 General residential zone (including SUB-P12 - Mangawhai/Hakaru Managed Growth area) to reduce the minimum lot size from 600m <sup>2</sup> to 475m <sup>2</sup> .	<ul style="list-style-type: none"> <li>The submitter recommends that the minimum lot size for the general residential zone (including in the SUB-P12 - Mangawhai/Hakaru Managed Growth area) should be reduced from 600m<sup>2</sup> to 475m<sup>2</sup>.</li> </ul>
129.2	Graham Taylor	SUB-S1	Amend	<b>AMEND</b> the minimum lot size for the Rural lifestyle zone to a minimum of 1 hectare unless specific environmental enhancement conditions are imposed such as dwellings being set low in the environment, subdued colour pallet and screen plantings.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
133.2	Estate of A J Ruiterman	SUB-S1	Amend	<p><b>RETAIN</b> the two minimum allotment size options of SUB-S1.5.a and b. when subdividing in the General residential zone.</p> <p>AND</p> <p><b>AMEND</b> SUB-S1.5.b, as follows:</p> <p>1. Allotments must have a minimum net site area of:</p> <p style="padding-left: 20px;">a. 600m<sup>2</sup>, or</p>	<ul style="list-style-type: none"> <li>The minimum allotment sizes are supported but clause 5.b requiring reticulated water and wastewater services to be 'available' is considered to be potentially open to interpretation by applicants and Council's processing staff.</li> <li>The submitter considers the higher density of 400m<sup>2</sup> should only be available when the allotments are 'connected to' reticulated water supply and wastewater services.</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				b. 400m <sup>2</sup> if <u>connected to</u> reticulated water supply and wastewater services <del>are available</del> outside of Mangawhai.	<ul style="list-style-type: none"> <li>The submitter acknowledges that there is an 'or' between clauses 5.a. and 5.b. but that the requested amendments will provide clarity and certainty for both applicants and Council staff.</li> </ul>
144.9	Pacific Coast Surveys Ltd	SUB-S1	Amend	<b>DELETE</b> SUB-S1.5.a and SUB-S1.5.b <b>AND</b> <b>AMEND</b> SUB-S1.5 to be 400m <sup>2</sup> .	<ul style="list-style-type: none"> <li>As drafted, the submitter considers the standard discriminates Mangawhai.</li> </ul>
174.2	G & A Gore	SUB-S1	Amend	<b>AMEND</b> the Rural lifestyle zone minimum lot size to 2ha	<ul style="list-style-type: none"> <li>There is no indication that the Council is going to provide services such as power, water supply, sealed roads and footpaths, but rather that they would be the responsibility of the owner entirely.</li> </ul>
217.76	Cato Bolam Consultants Limited	SUB-S1	Amend	<b>AMEND</b> SUB-S1 to provide higher densities in larger urban areas (Mangawhai and Dargaville) than in smaller settlements. <b>AND</b> <b>ADD</b> flexibility in SUB-S1 for subdivision and infill within Mangawhai which provides for interim subdivision where infrastructure capacity is proven, alternatives are offered, or development/financial contributions can resolve effects. <b>AND</b> <b>AMEND</b> SUB-S1 to identify staging or triggers for releasing subdivision capacity. <b>AND</b> <b>RETAIN</b> existing rights for lots lawfully existing or with prior consents. <b>AND</b> Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in the SUB standards, other Proposed District Plan chapters or maps.</li> <li>The General residential zone is the only residential zone, and SUB-S1.a. and b. have no regard for area specific character or context.</li> <li>The General rural zone 12ha minimum net site area is confusing given 4,000m<sup>2</sup> under SUB-R4 Small Lot rule.</li> <li>There is no explicit grandfathering of existing subdivision entitlements under the Operative District Plan.</li> </ul>
222.53	Kaipara District Council	SUB-S1	Amend	<b>AMEND</b> SUB-S1.5.B. to be consistent with GRZ-R3.	<ul style="list-style-type: none"> <li>There is inconsistency in wording between Rule GRZ-R3 Residential unit and Subdivision standard General residential zone SUB-S1.5.b Minimum allotment sizes.</li> </ul>
310.31	Fonterra Limited	SUB-S1	Amend	<b>AMEND</b> the minimum allotment sizes for the General residential zone under SUB-S1, as follows: <b>General residential zone</b> 5. Allotments must have a minimum net site area of: a. 600m <sup>2</sup> , or b. 400m <sup>2</sup> if reticulated water supply and wastewater services are available outside of Mangawhai, <u>and the allotments are located outside of the Maungatūroto Dairy Factory Noise Sensitive Area.</u> <b>AND</b> <b>AMEND</b> SUB-S1.10 as follows: <b>10. Activity status when compliance not achieved:</b> Discretionary <b>Note:</b> <u>If a resource consent application is made under this standard, the owner and operator of the Maungatūroto Dairy Factory will be considered an affected person in accordance with section 95E of the Act and notified of the application, where written approval is not provided.</u>	<ul style="list-style-type: none"> <li>There is a General residential zone on both sides of Doctors Hill Road located almost entirely within the Maungatūroto Dairy Factory Noise Sensitive Area. Rezoning the area to General residential zone under the Proposed District Plan would result in a significant increase in subdivision potential (as a result of the 400m<sup>2</sup> minimum lot size). However, it is critical to properly manage the relationship between new residential development near the Maungatūroto Site to ensure the site is not compromised as a result of reverse sensitivity effects.</li> </ul>
315.56	Horizon Surveying & Land Development	SUB-S1	Amend	<b>RETAIN</b> SUB-S1. <b>AND</b> <b>AMEND</b> the wording of SUB-S1 to improve clarity and ensure consistent interpretation and application across different site contexts.	<ul style="list-style-type: none"> <li>Generally supportive of provisions but clearer and more precise wording is needed.</li> </ul>
322.16	Kāinga Ora - Homes and Communities	SUB-S1	Amend	<b>AMEND</b> SUB-S1 as follows: General residential zone 5. Allotments must have a minimum net site area of: a. <del>6</del> 400m <sup>2</sup> , or b. <del>4</del> 300m <sup>2</sup> if reticulated water supply and wastewater services are available outside of Mangawhai. 6. Except that no minimum net site area requirement applies to any allotment created around an existing or proposed residential unit <del>that forms part of a multi-unit development</del> for which resource consent has been granted (excluding minor residential units). [...]	<ul style="list-style-type: none"> <li>The submitter opposes SUB-S1 in part and requests that the minimum vacant allotment size reflects the General residential zone relief sought. Moreover, the submitter does not consider no minimum net site area should apply to any allotment created around an existing or proposed residential unit, forming part of a consented multi-unit development (excluding minor residential units).</li> <li>Non-compliance with the Standard should be a Restricted Discretionary Activity.</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				10. Activity status when compliance not achieved: <del>Restricted</del> Discretionary AND Any further, alternative or consequential relief as necessary to fully achieve the relief sought.	
332.51	Northland Regional Council	SUB-S1	Amend	<b>AMEND</b> SUB-S1 to require the following: <ul style="list-style-type: none"> <li>600m<sup>2</sup> sites to have a wastewater connection.</li> <li>400m<sup>2</sup> sites to have both wastewater and reticulated water supply.</li> </ul> AND <b>AMEND</b> SUB-S1 to clarify that unserviced sites in the General residential zone require a 2,000m <sup>2</sup> minimum site area if necessary.	<ul style="list-style-type: none"> <li>The impact of 600m<sup>2</sup> sites without reticulated services requiring on-site servicing has the potential to impact on water supply due to groundwater contamination. Intensification at the densities proposed will also increase stormwater discharges due to an increase in impermeable areas.</li> <li>The submitter considers a minimum site area of 2,000m<sup>2</sup> consistent with RZ-R3 is required, to ensure services can be provided in a way that complies with regional discharge rules without creating cumulative effects. As sites smaller than 2,000m<sup>2</sup> potentially require regional consent, there is no 'as of right' potential to develop.</li> <li>It is noted that, in discussion with Kaipara District Council, this was not the intention behind SUB-S1 and, as such, amendments to achieve clarity are sought.</li> </ul>
352.2	M Tschirky	SUB-S1	Amend	<b>AMEND</b> SUB-S1.5 to have a minimum net site area of 600m <sup>2</sup> for the General residential zone regardless of the availability of reticulated water services.	<ul style="list-style-type: none"> <li>600 m<sup>2</sup> is in keeping with Kaipara's current character</li> </ul>
87.3	Laura Allen-Andrews	SUB-S1	Oppose	No specific decision requested, however the submission opposes the 4,000m <sup>2</sup> minimum site size for the Rural lifestyle zone due to the potential effects.	<ul style="list-style-type: none"> <li>Particularly noting the areas on the Kaipara district plan, where the rezoning has chosen areas such as Pahi peninsula, Petley Road and Tinopai that all run off into the Kaipara Harbour. I believe there has not been a comprehensive impact environmental study to look at the long-term effect of such intensification on the land bordering the Kaipara harbour and what significance this could have on the health of our beautiful harbour which has drawn many to the area.</li> <li>Without knowing the long term effect for our area, the submitter is against the current proposed minimum sizing of 4000sqm for the Rural Lifestyle zone.</li> </ul>
100.2	Fiona Stark	SUB-S1	Oppose	<b>AMEND</b> the minimum lot size for the Rural lifestyle zone to a minimum of 3 acres (approximately 12,000 m <sup>2</sup> ) for the Petley Road area.	<ul style="list-style-type: none"> <li>This would better reflect the rural setting and align with the expectations of current residents who value space, privacy, and a natural environment. Limit the number of small lots created in any one subdivision.</li> <li>Traffic and road safety concerns.</li> <li>Lack of infrastructure and services.</li> <li>Environmental impact.</li> <li>Access and land productivity will be impacted.</li> <li>The areas around Petley Road are rural localities and lack essential services.</li> <li>Densities expected in the Rural lifestyle zone are more appropriate for semi-urban areas.</li> </ul>
140.64	Horticulture New Zealand	SUB-S1	Oppose	No specific decision requested; however, the submission opposes the minimum rural lot size of 12ha in SUB-S1. AND Any consequential or alternative amendments required to address the concerns raised by the submitter.	<ul style="list-style-type: none"> <li>Opposes the minimum General Rural lot size of 12ha and questions what the rationale is, questioning whether it is intended to support rural production of lifestyle living?</li> </ul>
295.4	A & J Rutherford	SUB-S1	Oppose	No specific decision requested; however, the submission does not support the single Residential zoning with a minimum net site area of 600m <sup>2</sup> as set out in SUB-S1.5.a.	<ul style="list-style-type: none"> <li>This scale and intensity of residential development would not be appropriate given the topography and coastal setting of the immediate surrounds and general lack of infrastructure and safe transport connectivity around 4 and 4A Black Swamp Road, Mangawhai</li> </ul>
295.5	A & J Rutherford	SUB-S1	Oppose	No specific decision requested; however, the submission considers there is ambiguity in SUB-S1.5.b in relation to the provisions of 400m <sup>2</sup> allotments.	<ul style="list-style-type: none"> <li>The Proposed District Plan as drafted only provides for one residential zone and does not provide for alternative residential intensities between 600m<sup>2</sup> (Residential) and 4,000m<sup>2</sup> (Rural lifestyle) that could be an appropriate transition on the fringes of the residential and rural environments.</li> <li>It is further noted that the surrounding area is either classified as highly productive land use classification (LUC) 3 or does not hold highly productive land classification, therefore may be able to be urbanised pending the anticipated changes to the National</li> </ul>

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
					Policy Statement Highly Productive Land ("NPS HPL") Policy.
319.9	J Warden	SUB-S1	Oppose	<b>AMEND</b> SUB-S1 by increasing the minimum net size area for the General rural zone.	<ul style="list-style-type: none"> <li>12ha will allow continued fragmentation of the rural landscape.</li> </ul>
363.1	D & P Pirrit	SUB-S1	Oppose	<p><b>AMEND</b> the minimum allotment size in SUB-S1.7 for the Rural lifestyle zone to 2 hectares.</p> <p>AND</p> <p><b>ADD</b> a Large lot residential zone into the Proposed District Plan and provide a minimum allotment size of 4,000m<sup>2</sup> for that zone.</p> <p>AND</p> <p><b>AMEND</b> the zoning of land zoned Rural lifestyle zone within a 1km radius of an existing settlement (e.g. Paparoa or Pahi) to Large lot residential with a minimum allotment size of 4,000m<sup>2</sup></p> <p>OR</p> <p><b>AMEND</b> SUB-S1.7 to make the minimum allotment size in the Rural lifestyle zone 4,000m<sup>2</sup> where it is located within a one-kilometre radius of a General residential zone or a Commercial zone. Everywhere else (beyond the 1 km radius) in the Rural lifestyle zone has a minimum allotment size of 2 hectares.</p>	<ul style="list-style-type: none"> <li>The minimum net site area of 4,000m<sup>2</sup> in the Rural lifestyle zone is too small, and will not achieve the objectives and policies of the Rural lifestyle zone.</li> <li>Submitter considers that the minimum allotment size as proposed would create: <ul style="list-style-type: none"> <li>Loss of rural character</li> <li>Significant increased traffic on a dangerous intersection.</li> <li>Loss of primary production activity viability.</li> </ul> </li> <li>Potential increase in complaints to Council due to conflicts between increased residential activity and existing primary production activities.</li> <li>The allotment sizes are "out of sync" with the provisions of other nearby councils.</li> <li>A more nuanced approach is preferable.</li> </ul>
165.1	TAP Adventures Ltd	SUB-S1	Support	<b>RETAIN</b> SUB-S1.8. which sets out 12ha minimum net site area for the General rural zone.	<ul style="list-style-type: none"> <li>The minimum net site area is consistent with the Operative District Plan.</li> <li>Subdividing contributes to the economy and provides benefits for landowners.</li> <li>Subdivision also provides economic benefits for landowners seeking to subdivide and access capital and can assist farmers with their ongoing operational and environmental compliance costs.</li> </ul>
166.2	Wearmouth Farm Company Limited	SUB-S1	Support	<p><b>RETAIN</b> SUB-S1 if submitter's interpretation of the rule is correct. Submitter interprets that where reticulated water supply and wastewater connections are provided the minimum lot size is 400m<sup>2</sup>. Where reticulated water supply and wastewater connections are not provided the minimum lot size is 600m<sup>2</sup>.</p> <p>OR</p> <p><b>AMEND</b> SUB-S1 to allow for new lots created in the General residential zone to be serviced on site. Submitter can provide alternative wording if required.</p> <p>OR</p> <p>Alternative relief with similar effect.</p>	<ul style="list-style-type: none"> <li>If the General residential zone subdivision provisions do not provide an alternative for new lots to be serviced on-site, all new lots created in the General residential zone will need to be connected to reticulated services irrespective of the costs associated with extending reticulated services.</li> <li>For many properties, the costs of extending reticulated services will be prohibitive due to the physical distance from the reticulated network and physical site constraints.</li> <li>Significant increase in development contributions will outweigh the financial benefit that landowners obtain by selling serviced General residential zone titles.</li> <li>Allowing new General residential zone lots to be serviced on-site provides an alternative option for landowners to develop their property without incurring the significant costs associated with connecting to reticulated services.</li> </ul>
272.24	J & C Hawley	SUB-S1	Support	<p><b>RETAIN</b> SUB-S1.7. as notified.</p> <p>AND</p> <p><b>RETAIN</b> SUB-S1.8. as notified.</p>	<ul style="list-style-type: none"> <li>The minimum net site areas are appropriate.</li> </ul>
278.23	Marunui Conservation Ltd	SUB-S1	Support	<p><b>RETAIN</b> SUB-S1.7.</p> <p>AND</p> <p><b>RETAIN</b> SUB-S1.8.</p>	<ul style="list-style-type: none"> <li>The minimum net site areas are appropriate.</li> </ul>
295.2	A & J Rutherford	SUB-S1	Support	<b>RETAIN</b> the minimum net site area of 12 hectares set out in SUB-S1.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
362.4	Bruce Nelder of B & C Family Trust and Nelder Farms Ltd	SUB-S1	Support	<b>RETAIN</b> SUB-S1.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
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## Proposed Kaipara District Plan

### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
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140.65	Horticulture New Zealand	SUB-S2	Amend	<b>RETAIN</b> the requirement for a specified platform for new lots in SUB-S2. AND <b>ADD</b> an assessment of reverse sensitivity effects to SUB-S2. AND Any consequential or alternative amendments required to address the concerns raised by the submitter.	• The submitter supports requiring specified building platforms for new lots but opposes the lack of an assessment of reverse sensitivity effects.
315.57	Horizon Surveying & Land Development	SUB-S2	Amend	<b>AMEND</b> the building platform size requirement in SUB-S2 from 1,000m <sup>2</sup> to 500m <sup>2</sup> for General rural zone and Rural lifestyle zone allotments. OR <b>PROVIDE</b> flexibility of building platform in SUB-S2 through a performance standard or geotechnical certification.	• The requirement for a 1,000m <sup>2</sup> building platform is excessive.
217.77	Cato Bolam Consultants Limited	SUB-S2	Support	<b>RETAIN</b> SUB-S2. AND Any other relief that is consistent with and/or consequential to the submission.	• The submitter has sought this relief without limiting the scope of the submission on the details in the Subdivision standards, other Proposed District Plan chapters or maps.
362.8	Bruce Nelder of B & C Family Trust and Nelder Farms Ltd	SUB-S2	Support	<b>RETAIN</b> SUB-S2.	• No reasons provided.
217.78	Cato Bolam Consultants Limited	SUB-S3	Amend	<b>RETAIN</b> SUB-S3. AND Any other relief that is consistent with and/or consequential to the submission.	• The submitter has sought this relief without limiting the scope of the submission on the details in the Subdivision standards, other Proposed District Plan chapters or maps.

## Proposed Kaipara District Plan

### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
315.137	Horizon Surveying & Land Development	SUB-S3	Amend	<b>RETAIN</b> SUB-S3. AND <b>AMEND</b> the wording of SUB-S3 to improve clarity and ensure consistent interpretation and application across different site contexts.	<ul style="list-style-type: none"> <li>Generally supportive of provisions but clearer and more precise wording is needed.</li> </ul>
136.105	Federated Farmers of New Zealand (Inc) - Northland Province	SUB-S3	Support	<b>RETAIN</b> SUB-S3 as notified. OR With wording that achieves a similar intent. AND Any consequential amendments.	<ul style="list-style-type: none"> <li>The submitter supports SUB-S3 as notified.</li> </ul>
362.9	Bruce Nelder of B & C Family Trust and Nelder Farms Ltd	SUB-S3	Support	<b>RETAIN</b> SUB-S3.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
257.21	Piroa Conservation Trust	SUB-S4	Amend	<b>ADD</b> a new clause c. to SUB-S4.3 as follows: 3. <b>Matters over which discretion is restricted:</b> ... c. <u>Adverse effects on Outstanding Natural Landscapes and existing areas of indigenous vegetation</u>	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
272.25	J & C Hawley	SUB-S4	Amend	<b>ADD</b> a new clause c. to SUB-S4.3 as follows: 3. <b>Matters over which discretion is restricted:</b> c. <u>Adverse effects on Outstanding Natural Landscapes and existing areas of indigenous vegetation.</u>	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
278.24	Marunui Conservation Ltd	SUB-S4	Amend	<b>ADD</b> a new clause c. to SUB-S4.3 as follows: 3. <b>Matters over which discretion is restricted:</b> ... c. <u>Adverse effects on Outstanding Natural Landscapes and existing areas of indigenous vegetation.</u>	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
315.138	Horizon Surveying & Land Development	SUB-S4	Amend	<b>RETAIN</b> SUB-S4. AND <b>AMEND</b> the wording of SUB-S4 to improve clarity and ensure consistent interpretation and application across different site contexts.	<ul style="list-style-type: none"> <li>Generally supportive of provisions but clearer and more precise wording is needed.</li> </ul>
217.79	Cato Bolam Consultants Limited	SUB-S4	Support	<b>RETAIN</b> SUB-S4. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in the Subdivision standards, other Proposed District Plan chapters or maps.</li> </ul>
362.10	Bruce Nelder of B & C Family Trust and Nelder Farms Ltd	SUB-S4	Support	<b>RETAIN</b> SUB-S4.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
231.34	S Cullen	SUB-S5	Amend	<b>AMEND</b> Rule SUB-S5 to include provision for onsite servicing in areas not benefited by public services. AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>As proposed it is unclear if the requirement to provide three waters infrastructure enables the use of onsite servicing which is often required for industrial activities located in rural areas.</li> </ul>
253.16	McRobbie Dowling Limited	SUB-S5	Amend	<b>AMEND</b> SUB-S5 to include provision for on-site servicing in areas not benefited by public services. AND Any necessary consequential amendments.	<ul style="list-style-type: none"> <li>Unclear if the requirement to provide three waters infrastructure enables the use of on-site servicing which is often required for industrial activities located in rural areas.</li> </ul>
283.169	Northpower Limited and Northpower Fibre Limited	SUB-S5	Amend	<b>AMEND</b> SUB-S5 as follows: 1. All new allotments, except allotments for access, roads, utilities or reserves must be provided with: a. Three waters infrastructure complying with the Kaipara District Council Engineering Standards 2011; and b. <del>The option to</del> <u>ability to</u> connect <del>above ground or underground</del> to a reticulated electrical supply network at the net-site area boundary or demonstrate that this can be generated and supplied on-site.; and c. <u>The ability to connect to a wireless telecommunications system, or an above ground or underground connection to a telecommunications system at the boundary of the net site area.</u> AND	<ul style="list-style-type: none"> <li>To ensure more directive language.</li> <li>To provide for flexibility for the type of solution depending on circumstances and constraints of the site being subdivided and developed.</li> <li>To require new allotments to connect to a telecommunications supply.</li> <li>To provide for wireless technology.</li> </ul>



## Proposed Kaipara District Plan

### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				Any further necessary consequential amendments required.	
308.48	Fire and Emergency New Zealand	SUB-S5	Amend	<b>AMEND</b> SUB-S5, as follows: 2. All new allotments, except allotments for access, roads, utilities or reserves, must be provided with: <ol style="list-style-type: none"> <li>Three waters infrastructure complying with the Kaipara District Council Engineering Standards 2011; and</li> <li>The option to connect to a reticulated electrical supply network at the net-site area boundary or demonstrate that this can be generated and supplied on-site.</li> <li><u>A firefighting water supply compliant with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u></li> </ol>	<ul style="list-style-type: none"> <li>SUB-S5 is supported to the extent that all new allotments in all zones must be provided with three waters infrastructure complying with the Kaipara District Council Engineering Standards 2011.</li> <li>However, as SUB-S5 applies to all zones, the submitter is concerned that the Kaipara District Council Engineering Standards 2011 does not adequately cover unreticulated areas. The submission therefore seeks a new standard that addresses this apparent gap for unreticulated development scenarios and the provision of an adequate firefighting water supply. This addition is considered to adequately give effect to the policy framework of the Proposed District Plan, specifically SUB-P2.</li> </ul>
315.139	Horizon Surveying & Land Development	SUB-S5	Amend	<b>RETAIN</b> SUB-S5. <b>AND</b> <b>AMEND</b> the wording of SUB-S5 to improve clarity and ensure consistent interpretation and application across different site contexts.	<ul style="list-style-type: none"> <li>Generally supportive of provisions but clearer and more precise wording is needed.</li> </ul>
26.74	Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ	SUB-S5	Oppose	<b>AMEND</b> SUB-S5. <b>OR</b> <b>ADD</b> a new standard for telecommunications infrastructure similar (as per Porirua District Plan) to the following: <b><u>Residential, Commercial, Industrial, Specific Purpose Zone</u></b> <u>[X]. All new allotments must have provision for open access fibre optic cable connections to the legal boundary of the allotments.</u> <b><u>All Other Zones</u></b> <u>[XX]. All new allotments must have provision for connection to telecommunication infrastructure. This may be achieved by either:</u> <ol style="list-style-type: none"> <li><u>Provision for open access fibre optic cable connections to the legal boundary of the allotments;</u></li> <li><u>or</u></li> <li><u>Provision with any subdivision consent application of written confirmation from a telecommunication network operator confirming that connection to a telecommunications network can be provided to all new allotments and describing how this can be achieved.</u></li> </ol> <u>[XXX]. The written confirmation that connection to a telecommunications network can be achieved which is required under [XX. B] must include that the connection can be achieved to:</u> <ol style="list-style-type: none"> <li><u>A mobile and wireless network, including a satellite network, if connection to such a network is available.</u></li> </ol> <b><u>[XXXX] Activity status where compliance not achieved with [X]-[XXX]: Restricted Discretionary Activity</u></b> <u>Matters of discretion restricted to:</u> <ol style="list-style-type: none"> <li><u>The extent to which the proposed telecommunications services is sufficient for the development or activity it serves;</u></li> <li><u>Where any reticulated telecommunications system is not immediately available but is likely to be in the near future, the appropriateness of temporary supply solutions; and</u></li> <li><u>Whether any site constraints make compliance impracticable.</u></li> </ol> <b>AND</b> Any alternative relief and/or consequential amendments.	<ul style="list-style-type: none"> <li>The servicing requirements for new lots in all zones only requires three-waters infrastructure and the option to connect to an electrical supply network. There is no requirement to connect to or be able to connect to a telecommunications network, even where open access fibre is available. This is inconsistent with Objective Sub-O4 that requires subdivision to be integrated with infrastructure services in an efficient, effective and coordinated manner, and Policy Sub-P2 requiring infrastructure to be installed at the time of subdivision.</li> </ul>
136.106	Federated Farmers of New Zealand (Inc) - Northland Province	SUB-S5	Support	<b>AMEND</b> SUB-S5 as follows: <ol style="list-style-type: none"> <li>All new allotments, except allotments for access, roads, utilities or reserves <u>or allotments where on-site infrastructure is proposed</u>, must be provided with:               <ol style="list-style-type: none"> <li>a...</li> </ol> </li> <li><b>Activity status when compliance not achieved:</b>  <u>Discretionary-Restricted discretionary</u> </li> </ol>	<ul style="list-style-type: none"> <li>The standard needs to be consistent with policy SUB-P2.</li> <li>Clause 3 of Policy SUB-P3 exempts on-site infrastructure from installation at the time of subdivision, recognising it cannot be determined until the allotment is developed.</li> </ul>

## Proposed Kaipara District Plan

### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				<p>3. <u>Where:</u></p> <p>1. <u>[list matters of discretion for non-compliant servicing proposals]</u></p> <p>OR</p> <p>Wording that achieves a similar intent.</p> <p>AND</p> <p>Any consequential amendments.</p>	<ul style="list-style-type: none"> <li>Clause 4 of the policy exempts allotments in the General rural zone being required to connect to the Council's reticulated systems. The submitter also believes the Council can reasonably identify all of effects or issues the activity may have, and as such they should list them in rule with restricted discretionary status.</li> </ul>
165.7	TAP Adventures Ltd	SUB-S5	Support	<b>RETAIN</b> SUB-S5.1.b.	<ul style="list-style-type: none"> <li>The submission supports giving lots the option to demonstrate onsite power generation. Requiring a grid power connection at subdivision is not a resource management issue and an outdated approach.</li> </ul>
166.3	Wearmouth Farm Company Limited	SUB-S5	Support	<p><b>RETAIN</b> SUB-S5 if submitter's interpretation of the rule is correct. Submitter interprets that where reticulated water supply and wastewater connections are provided the minimum lot size is 400m<sup>2</sup>. Where reticulated water supply and wastewater connections are not provided the minimum lot size is 600m<sup>2</sup>.</p> <p>OR</p> <p><b>AMEND</b> SUB-S5 to allow for new lots created in the General residential zone to be serviced on site. Submitter can provide alternative wording if required.</p> <p>OR</p> <p>Alternative relief with similar effect.</p>	<ul style="list-style-type: none"> <li>If the General residential zone subdivision provisions do not provide an alternative for new lots to be serviced on-site, all new lots created in the General residential zone will need to be connected to reticulated services irrespective of the costs associated with extending reticulated services.</li> <li>For many properties, the costs of extending reticulated services will be prohibitive due to the physical distance from the reticulated network and physical site constraints.</li> <li>Significant increase in development contributions will outweigh the financial benefit that landowners obtain by selling serviced General residential zone titles.</li> <li>Allowing new General residential zone lots to be serviced on-site provides an alternative option for landowners to develop their property without incurring the significant costs associated with connecting to reticulated services.</li> </ul>
217.80	Cato Bolam Consultants Limited	SUB-S5	Support	<p><b>RETAIN</b> SUB-P3.</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"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in the Subdivision standards, other Proposed District Plan chapters or maps, including scope to make further submissions on a variation to introduce update Kaipara District Council Engineering Standards.</li> </ul>
362.11	Bruce Nelder of B & C Family Trust and Nelder Farms Ltd	SUB-S5	Support	<b>RETAIN</b> SUB-S5.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
254.4	Northpoint Ltd	SUB-S6	Amend	<p><b>AMEND</b> SUB-S6, as follows:</p> <ol style="list-style-type: none"> <li>Each allotment shall have legal access to a formed road.</li> <li>Vehicular access shall be designed and constructed in accordance with the Kaipara District Council Engineering Standards 2011.</li> <li><u>For any subdivision of Lot 1 DP 65922, the intersection between State Highway 14 and Awakino Point North Road must be upgraded to the satisfaction of the New Zealand Transport Agency Waka Kotahi.</u></li> <li><b>Activity status when compliance with SUB-S6.1 or SUB-S6.2 not achieved:</b> Discretionary</li> <li><b>Activity status when compliance with SUB-S6.3 not achieved:</b> Restricted discretionary</li> <li><b>Matters over which discretion is restricted:</b> <ol style="list-style-type: none"> <li><u>Efficient and effective transport network;</u></li> <li><u>Traffic safety in relation to site ingress and egress;</u></li> <li><u>Pedestrian and cyclist safety and navigability;</u></li> <li><u>Whether an intersection upgrade is warranted by the scale of the subdivision and volume of traffic generated;</u></li> <li><u>Consideration of street trees and entrance treatments for the Awakino Point North Road entrance(s).</u></li> </ol> </li> </ol> <p>OR</p> <p>Alternative relief with similar effect.</p>	<ul style="list-style-type: none"> <li>Intent of proposed change is to require that the intersection is addresses as part of any subdivision of the site, in general alignment with the transport-related requirements for subdivisions in the 'Light Industrial Area' in the adjoining Trifecta Special Purpose Zone.</li> </ul>
315.58	Horizon Surveying & Land Development	SUB-S6	Amend	<b>AMEND</b> SUB-S6 to remove the requirement to construct vehicle crossings at the time of subdivision and replace with a requirement for legal access only, with physical construction tied to future development or building consent.	<ul style="list-style-type: none"> <li>The requirement to construct a vehicle access at the time of subdivision is impractical.</li> </ul>

## Proposed Kaipara District Plan

### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
217.81	Cato Bolam Consultants Limited	SUB-S6	Support	<b>RETAIN</b> SUB-S6. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in the Subdivision standards, other Proposed District Plan chapters or maps, including scope to make further submissions on a variation to introduce update Kaipara District Council Engineering Standards.</li> </ul>
308.49	Fire and Emergency New Zealand	SUB-S6	Support	<b>RETAIN</b> SUB-S6 as notified.	<ul style="list-style-type: none"> <li>The requirement that each allotment shall have legal access to a formed road and that vehicular access be designed and constructed in accordance with the Kaipara District Council Engineering Standards 2011 is supported.</li> </ul>
217.82	Cato Bolam Consultants Limited	SUB-S7	Amend	<b>RETAIN</b> SUB-S7 to enable roads to be private where they cannot meet Kaipara District Council Engineering Standards 2011. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>No particular reason for the requested provision above has been identified however, the submitter has sought this relief without limiting the scope of the submission on the details in the subdivision standards, other Proposed District Plan chapters or maps, including scope to make further submissions on a variation to introduce update Kaipara District Council Engineering Standards.</li> </ul>
308.50	Fire and Emergency New Zealand	SUB-S7	Support	<b>RETAIN</b> SUB-S7 as notified.	<ul style="list-style-type: none"> <li>The requirement that roads, cycleways and footpaths associated with subdivision shall be designed, constructed and vested in accordance with the Kaipara District Council Engineering Standards 2011.</li> </ul>
212.31	BA & JK Paton Ltd	SUB-S8	Amend	No specific decision requested; however, the submission supports in part SUB-S8. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>
294.4	Birt & Currie Surveyors Limited	SUB-S8	Amend	<b>AMEND</b> SUB-S8 to delete clause SUB-S8.1.d and 2.d, and reconsider whether it should apply to all qualifying waterways or just priority areas.	<ul style="list-style-type: none"> <li>Clause d is what happens if a, b or c is true.</li> <li>Submission questions whether Council actually wants to acquire esplanade reserves or strips along all qualifying waterways as they will have to pay for the land and surveying, and resourcing should be put into priority areas rather than a piecemeal, ad-hoc series of disjointed esplanades that nobody wants.</li> </ul>
304.102	Director General of Conservation	SUB-S8	Amend	<b>AMEND</b> SUB-S8.1.a. as follows: 1. Where the allotment less than 4ha are created to: a. <del>The coast along the mark of mean high-water springs of the sea</del> AND Any further or alternative relief to like effect to that sought.	<ul style="list-style-type: none"> <li>An amendment is required to fully align the standard with requirements in s230 of the Resource Management Act.</li> </ul>
315.59	Horizon Surveying & Land Development	SUB-S8	Amend	<b>DELETE</b> SUB-S8.2 to ensure consistency with Section 230(3) of the Resource Management Act.	<ul style="list-style-type: none"> <li>SUB-S8.2 appears to conflict with the Resource Management Act provisions under Section 230(3) for sites greater than 4 hectares.</li> </ul>
217.83	Cato Bolam Consultants Limited	SUB-S8	Support	<b>RETAIN</b> SUB-S8. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in the Subdivision standards, other Proposed District Plan chapters or maps.</li> </ul>
292.70	Transpower New Zealand Limited	SUB-S9	Oppose	<b>DELETE</b> SUB-S9. OR <b>AMEND</b> SUB-S9 to ensure it reflects the requirements of INF-R52 as sought in another submission point.	<ul style="list-style-type: none"> <li>The submitter supports INF-R52, with a minor amendment. The submitter's preference is to retain INF-R52, with the amendment sought, and delete SUB-S9 to avoid any potential confusion.</li> </ul>
309.77	Clarus	SUB-S10	Amend	<b>AMEND</b> SUB-S10 as follows: 1. Any proposed building platform must be located at least <del>20m-14m</del> from the gas or petroleum pipeline designation or <del>30m from the boundary of the land title containing any</del> above ground station. 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"> <li>This rule should be linked to the location of the designation not the pipeline, for greater certainty.</li> <li>The hazard associated with an above ground station for adjacent residential or other sensitive activities is greater than the hazard associated with the pipeline itself which is buried in the ground. Accordingly a greater setback for building platforms from above ground stations is appropriate.</li> <li>In line with the submitter's requests in other submission points, amending the standard allows for a consistent approach within the Proposed District Plan.</li> </ul>
212.32	BA & JK Paton Ltd	SUB-S14	Amend	<b>RETAIN</b> SUB-S14. AND	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>

## Proposed Kaipara District Plan

### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
				Any other relief that is consistent with and/or consequential to the submission.	
257.22	Piroa Conservation Trust	SUB-S14	Amend	<p><b>AMEND</b> SUB-S14.4 as follows:</p> <p>4. <b>Activity status when compliance with SUB-S14.1.c-e not achieved:</b> <del>Discretionary</del> <u>Non-Complying</u></p> <p>AND</p> <p><b>ADD</b> standards of compliance where SUB-S14.1.c-e are not achieved as follows (at the very least):</p> <ol style="list-style-type: none"> <li>The proposed location and design of the subdivision; and</li> <li>Integration of potential building platforms into the landscape including: <ul style="list-style-type: none"> <li><u>Siting in relation to ridgelines;</u></li> <li><u>Effect on indigenous vegetation;</u></li> <li><u>Extent of earthworks and fill material;</u></li> <li><u>Accessways and circulation;</u></li> <li><u>Mitigation planting; and</u></li> </ul> </li> </ol> <p><u>Effect on landscape and amenity.</u></p>	<ul style="list-style-type: none"> <li>If a site contains an area within an Outstanding Natural Landscape (ONL) or within an Outstanding Natural Feature (ONF) and the remainder of the site is outside those features, then any building platform should be located entirely outside of an ONL or an ONF.</li> </ul>
272.26	J & C Hawley	SUB-S14	Amend	<p><b>AMEND</b> the activity status of SUB-S14.4. as follows:</p> <p>4. <b>Activity status when compliance with SUB-S14.1.c-e not achieved:</b> <del>Discretionary</del> <u>Non-Complying</u></p> <p>AND</p> <p><b>ADD</b> standards of compliance where SUB-S14.1.c to e. are not achieved as follows (at the very least):</p> <ol style="list-style-type: none"> <li>The proposed location and design of the subdivision; and</li> <li>Integration of potential building platforms into the landscape including: <ol style="list-style-type: none"> <li><u>Siting in relation to ridgelines</u></li> <li><u>Effect on indigenous vegetation</u></li> <li><u>Extent of earthworks and fill material</u></li> <li><u>Accessways and circulation.</u></li> <li><u>Mitigation planting</u></li> </ol> </li> </ol> <p><u>Effect on landscape and amenity.</u></p>	<ul style="list-style-type: none"> <li>If a site contains an area within an Outstanding Natural Landscape or within an Outstanding Natural Feature and the remainder of the site is outside those features then any building platform should be located entirely outside of an Outstanding Natural Landscape or an Outstanding Natural Feature.</li> </ul>
278.25	Marunui Conservation Ltd	SUB-S14	Amend	<p><b>AMEND</b> the activity status of SUB-S14.4. as follows:</p> <p>4. <b>Activity status when compliance with SUB-S14.1.c.-e. not achieved:</b> <del>Discretionary</del> <u>Non-Complying</u></p> <p>AND</p> <p><b>ADD</b> standards of compliance where SUB-S14.1.c. to e. are not achieved as follows (at the very least):</p> <ol style="list-style-type: none"> <li><u>The proposed location and design of the subdivision; and</u></li> <li><u>Integration of potential building platforms into the landscape including:</u> <ul style="list-style-type: none"> <li><u>Siting in relation to ridgelines;</u></li> <li><u>Effect on indigenous vegetation;</u></li> <li><u>Extent of earthworks and fill material;</u></li> <li><u>Accessways and circulation;</u></li> <li><u>Mitigation planting; and</u></li> </ul> </li> </ol> <p><u>Effect on landscape and amenity.</u></p>	<ul style="list-style-type: none"> <li>If a site contains an area within an Outstanding Natural Landscape or within an Outstanding Natural Feature and the remainder of the site is outside those features then any building platform should be located entirely outside of an Outstanding Natural Landscape or an Outstanding Natural Feature.</li> </ul>
304.103	Director General of Conservation	SUB-S14	Amend	<p><b>ADD</b> a new subclause to SUB-S14.1. as follows:</p> <p><u>f. significant indigenous vegetation or habitat, natural wetland or mobile duneland.</u></p> <p>AND</p> <p>Any further or alternative relief to like effect to that sought.</p>	<ul style="list-style-type: none"> <li>The submitter requests SUB-S14 is amended to ensure building platforms are located outside of the areas listed. It is noted that a stable dune with indigenous vegetation would be captured under significant indigenous vegetation and, as such, only the mobile part requires specification (e.g. Mangawhai).</li> </ul>
315.60	Horizon Surveying & Land Development	SUB-S14	Amend	<p><b>AMEND</b> SUB-S14 to include sufficient landscape assessment criteria to carry out an appropriate assessment of a subdivision proposal.</p>	<ul style="list-style-type: none"> <li>Kaipara has recognised these areas as important to the district and subdivision and development in these areas needs to be carefully considered.</li> </ul>
217.84	Cato Bolam Consultants Limited	SUB-S14	Support	<p><b>RETAIN</b> SUB-S14.</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"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in the Subdivision standards, other Proposed District Plan chapters or maps.</li> </ul>
295.3	A & J Rutherford	SUB-S14	Support	<p><b>RETAIN</b> SUB-S14 in particular for future building platforms being located entirely outside of the Coastal Environment Overlay within the General rural zone.</p>	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>

## Proposed Kaipara District Plan

### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
212.33	BA & JK Paton Ltd	SUB-S15	Amend	<b>AMEND</b> the activity status of SUB-S15.2 from discretionary to restricted discretionary, including matters over which discretion is restricted e.g. not exacerbating hazard on site or adjoining properties, not endangering persons or structures. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>Specifically, the above relief is sought as a Discretionary activity status is not necessary and creates uncertainty about assessment criteria.</li> </ul>
217.85	Cato Bolam Consultants Limited	SUB-S15	Amend	<b>AMEND</b> the activity status of SUB-S15.2 to a Restricted Discretionary activity, including the matters over which discretion is restricted, e.g. not exacerbating hazard on site or adjoining properties, not endangering persons or structures. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in the Subdivision standards, other Proposed District Plan chapters or maps.</li> <li>In addition, the above relief has been requested as the submitter considers that a Discretionary Activity status is not necessary and creates uncertainty about the assessment criteria.</li> </ul>
315.61	Horizon Surveying & Land Development	SUB-S15	Amend	<b>AMEND</b> SUB-S15 to clarify the legal status and effect of notes, particularly whether they carry any statutory weight. If the notes are for guidance only, ensure that they are clearly labelled as non-statutory and do not influence the interpretation or enforceability of rules.	<ul style="list-style-type: none"> <li>Greater clarity is required regarding the legal status and effect of notes, particularly whether they carry any statutory weight.</li> </ul>
125.3	Madara Vilde	SUB-S16	Amend	<b>AMEND</b> SUB-S16 to: <ul style="list-style-type: none"> <li>Increase threshold of extent of ecological feature required to be protected.</li> <li>Distinguish requirements for protection and allotment entitlements according to ecological feature (wetland, bush).</li> <li>Include restoration planting, riparian planting and degraded wetland restoration as options for subdivision entitlements.</li> <li>Include buffer requirements around riparian margins and wetlands.</li> <li>Allow the combining of different ecological features to increase allotment entitlements.</li> <li>Require fencing, covenanting, stock exclusion, pet restrictions.</li> <li>Require an Ecological Management Plan for all features to be protected.</li> </ul> See submission details of the for full replacement of SUB-S16-Table 1 and associated standards.	<ul style="list-style-type: none"> <li>The 0.5ha threshold is too low for many ecological feature types, and may result in fragmented and marginal vegetation being protected.</li> <li>The 0.5ha threshold ignores ecological differences between feature types.</li> <li>The standard excludes restoration planting as a pathway to lot entitlement, which does not align with national policy direction in the NPS-IB and NPS-FM.</li> <li>The submission refers to Whangārei and Auckland Plans as more robust environmental benefit subdivision frameworks.</li> <li>See submission for further details.</li> </ul>
211.6	B & I McClean	SUB-S16	Amend	<b>AMEND</b> SUB-S16 so it is clear that the standard applies to restoration or enhancement planting subdivision as well as environmental benefit subdivision.	<ul style="list-style-type: none"> <li>The submitter has requested the above relief as SUB-S16 reads as though it only applies to Environmental Benefit Subdivision, and not Restoration or Enhancement Planting Subdivisions as well. This needs to be clarified.</li> </ul>
237.9	K P Dreadon Limited	SUB-S16	Amend	<b>AMEND</b> SUB-S16 to include a reference to SUB-S16A (new table specifying offset yields by ecosystem type and quality) and cross-reference to Offset Management Plan Schedule (Schedule X)	<ul style="list-style-type: none"> <li>SUB-S16 sets important thresholds for environmental benefit subdivision but lacks specificity for ecological quality or restoration requirements</li> </ul>
257.23	Piroa Conservation Trust	SUB-S16	Amend	<b>AMEND</b> SUB-S16 Table 1, Column 2, as follows: Maximum number of lots that can be created from an individual Record of Title: 53 AND <b>AMEND</b> SUB-S16.2, as follows: <b>2. Activity status where compliance not achieved:</b> <b>Discretionary Non-Complying</b>	<ul style="list-style-type: none"> <li>To enable the creation of 5 lots on an individual site seems to contradict the general purpose of the General rural zone.</li> <li>The balance of the site should not be available for further applications for Environmental Benefit Lots.</li> <li>Environmental Benefit Subdivisions have been popular in the past and benefited the applicant but not necessarily the environment.</li> </ul>
272.27	J & C Hawley	SUB-S16	Amend	<b>AMEND</b> SUB-S16 Table 1, Column 2 as follows: Maximum number of lots that can be created from an individual Record of Title: 53 AND <b>AMEND</b> SUB-S16.2, as follows: <b>2. Activity status where compliance not achieved:</b> <b>Discretionary Non-Complying</b> AND <b>AMEND</b> SUB-S16 so that in the case of Environmental Benefit Lots achieved through restoration or enhancement planting, the number of Environmental Benefit Lots per title should be reduced to a maximum of 2 given the level of uncertainty.	<ul style="list-style-type: none"> <li>To enable the creation of 5 lots on an individual site seems to contradict the general purpose of the General rural zone.</li> <li>Environmental Benefit Subdivisions have been popular in the past and benefited the applicant but not necessarily the environment.</li> <li>The balance of the site should not be available for further applications for Environmental Benefit Lots.</li> </ul>

## Proposed Kaipara District Plan

### Summary of Submissions for the topic of: Subdivision

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
278.26	Marunui Conservation Ltd	SUB-S16	Amend	<p><b>AMEND</b> SUB-S16 Table 1 Column 2, as follows: Maximum number of lots that can be created from an individual Record of Title:53</p> <p>AND</p> <p><b>AMEND</b> SUB-S16.2. as follows:</p> <p><b>2. Activity status where compliance not achieved:</b> <del>Discretionary Non-Complying</del></p> <p>AND</p> <p><b>AMEND</b> SUB-S16 so that in the case of Environmental Benefit Lots achieved through restoration or enhancement planting, the number of Environmental Benefit Lots per title should be reduced to a maximum of 2 given the level of uncertainty.</p>	<ul style="list-style-type: none"> <li>To enable the creation of 5 lots on an individual site seems to contradict the general purpose of the General rural zone.</li> <li>Environmental Benefit Subdivisions have been popular in the past and benefited the applicant but not necessarily the environment.</li> <li>The balance of the site should not be available for further applications for Environmental Benefit Lots.</li> </ul>
334.4	Native Forest Restoration Trust	SUB-S16	Amend	<p><b>AMEND</b> SUB-S16 to provide for a graduated scale of benefits, with more subdivision benefit per hectare of wetland protection, than per hectare of indigenous vegetation protection.</p> <p>AND</p> <p><b>AMEND</b> the subdivision yield for protection of indigenous vegetation in SUB-S16 to achieve a more graduated scale to encourage protection of larger areas of forest/bush more in line with the Auckland Unitary Plan Table E39.6.4.4.1.</p> <p>AND</p> <p><b>AMEND</b> objectives, policies and rules as appropriate to implement the above provisions.</p>	<ul style="list-style-type: none"> <li>The submitter has requested the above relief for the following reasons:</li> <li>Grouping together of vegetation and wetland protection is an appropriate reward for the protection of wetlands but over rewards those protecting small areas of native forest.</li> <li>The rules should be nuanced to acknowledge that wetlands are inevitably on the small side, while native vegetation is not so constrained and this should be reflected in the standard.</li> <li>To achieve a more graduated scale to encourage protection of larger areas of forest/bush, to be in line with the Auckland Unitary Plan - Table E39.6.4.4.1.</li> <li>The number of incentives lots provided for in SUB-S16 for indigenous vegetation protection is too generous and should be more in line with the Auckland Unitary Plan - Table E39.6.4.4.1</li> </ul>
304.104	Director General of Conservation	SUB-S16	Oppose	<p><b>DELETE</b> SUB-S16 and replace it with the approach used in the Proposed Whangarei District Plan.</p> <p>AND</p> <p>Any further or alternative relief to like effect to that sought.</p>	<ul style="list-style-type: none"> <li>The standard is inappropriate and does not adequately reflect loss of indigenous biodiversity. In the Whangarei Proposed District Plan Subdivision chapter, a classification system of different types of environmental protection areas assigned with different allotment requirements is used. The submitter requests that an approach like that of Whangarei District Council is integrated.</li> </ul>
319.7	J Warden	SUB-S16	Oppose	<p><b>PROVIDE</b> technical evidence on how the Environmental Benefit lot entitlement thresholds in SUB-S16 were created.</p> <p>AND</p> <p><b>AMEND</b> the threshold for restoration or enhancement planting from 0.5 ha to at least 2 ha for the first lot in SUB-S16.</p>	<ul style="list-style-type: none"> <li>The intent is questioned for SUB-S16.</li> <li>The submitter would have to rely on the background technical ecological input (if any was provided) in relation to SUB-S16 Environmental benefit subdivision lot entitlements.</li> <li>The size threshold for SUB-R7 of 0.5ha is rather low especially when there is the opportunity to create 4 additional lots from as little as 2ha of planting which from an ecological and landscape scale is very minimalistic.</li> </ul>
212.34	BA & JK Paton Ltd	SUB-S16	Support	<p><b>RETAIN</b> SUB-S16.</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"> <li>No reasons provided.</li> </ul>
217.86	Cato Bolam Consultants Limited	SUB-S16	Support	<p><b>RETAIN</b> SUB-S16.</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"> <li>The submitter has sought this relief without limiting the scope of the submission on the details in the Subdivision standards, other Proposed District Plan chapters or maps.</li> </ul>
267.20	Northland Fish and Game Council	SUB-S16	Support	<p><b>RETAIN</b> SUB-S16 as notified.</p>	<ul style="list-style-type: none"> <li>No reasons provided.</li> </ul>