



Kaipara te Oranganui • Two Oceans Two Harbours

Proposed Kaipara District Plan **Volume 3 - Summary of Submissions** **for Submissions 149 - 200**

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 Summary Tables

- Decisions are organized by submitter number. To view which Volume of the Summary of Submissions contains other submissions outside this Volume, click [here](#).
- Where specific wording changes have been requested in submissions, those changes shown as:
 - Underlined = new wording
 - ~~Strikethrough~~ = deletions

How to Make a Further Submission

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

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

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

Disclaimer:

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

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

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

PROPOSED KAIPARA DISTRICT PLAN – SUMMARY OF SUBMISSIONS
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(includes Submissions 149 - 200)

Submission Point No.	Submitter	Plan Section	Position	Summary of Decisions Requested	Reasons
149.1	Royal Forest and Bird Protection Society of New Zealand Incorporated	Purpose	Amend	<p>AMEND the Purpose chapter to include the following:</p> <ul style="list-style-type: none"> A description of the Kaipara District's natural values, including biodiversity, landscape, freshwater and coastal environments; and Clear expression of the Proposed District Plan role in enabling appropriate use and development, protecting and maintaining natural environment values through managing subdivision, use and development. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes the Purpose chapter of the Proposed District Plan in part. It is acknowledged that the Kaipara District is growing and, as such, Council seeks to produce a simple and enabling Proposed District Plan. The proposed introductory sections emphasise enabling growth and development, as well as the use of natural and physical resources. Though these are important elements for wellbeing within Kaipara, it is requested that these sections are amended to reflect the District's natural values, including its landscapes indigenous biodiversity, freshwater and coastal ecosystems, and other taonga. All of these elements shape Kaipara's identity. A district plan should promote the sustainable management of natural and physical resources which involves enabling land use and development while safeguarding the life-supporting capacity of natural resources and managing environmental effects by avoidance, mitigation or remedy. The submitter considers that the Proposed District Plan's introductory sections should align with the purpose of the Resource Management Act and national direction instruments, including the National Policy Statement for Freshwater Management, New Zealand Coastal Policy Statement and National Policy Statement for Indigenous Biodiversity. The recognition of natural values and requiring early protection will enable a more balanced and integrated approach.
149.2	Royal Forest and Bird Protection Society of New Zealand Incorporated	Definitions	Amend	<p>AMEND the term from "Vegetation Clearance" to "Vegetation Alteration and Clearance".</p> <p>AND</p> <p>AMEND the definition of "Vegetation Clearance" as follows:</p> <p>In relation to indigenous vegetation, includes <u>means</u> the pruning, trimming, clearance and removal, <u>damage or destruction</u> of any indigenous vegetation.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised, including amending all references to the term throughout the Proposed District Plan from "Vegetation Clearance" to "Vegetation Alteration and Clearance".</p>	<ul style="list-style-type: none"> The defined term is opposed in part. As drafted, the definition does not capture all of the impacts on indigenous vegetation capable of causing a loss of vegetation. The submitter considers this omission could enable vegetation alteration and removal resulting in adverse effects on indigenous biodiversity. The submitter requests a more detailed definition and amendment to the term itself to provide further clarity and thus protection. The term is unclear as to whether it includes alteration as 'Vegetation Clearance' only conveys it is related to complete removal. Misinterpretation could result in the scope of associated provisions being misinterpreted and alterations with adverse effects on indigenous vegetation being undertaken. By amending the term to 'Vegetation Alteration and Clearance' the scope of its application becomes clear throughout the plan.
149.3	Royal Forest and Bird Protection Society of New Zealand Incorporated	National Policy Statements and New Zealand Coastal Policy Statement	Amend	<p>AMEND national direction table so it is in the format required by the National Planning Standards.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The policy statement tables are not in the form required by the National Planning Standards. Resultingly, the extent to which the Proposed District Plan has given effect to relevant national direction is not clear.
149.4	Royal Forest and Bird Protection Society of New Zealand Incorporated	Vision for Kaipara	Amend	<p>ADD additional objectives to the Strategic Direction - Vision for Kaipara chapter to include recognition of the Kaipara District's natural environment, biodiversity, landscapes, waterways, waterbodies and coastal ecosystems. These objectives should recognise the importance of protecting and enhancing natural values and the role of nature-based solutions for enabling appropriate development.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter notes that the Vision for Kaipara Objectives are focused on enabling growth and development of housing and infrastructure. It is acknowledged that these are important elements of Kaipara's future; however, there is no mention of the natural environment, nor its protection and enhancement. Though environmental matters are addressed further on in the Strategic Direction section of the Proposed District Plan, as this section is entitled 'Vision for Kaipara', it should envision the natural environment as a key component of Kaipara District's present and future identity. The submitter opposes the omission of environmental objectives from the overarching 'Vision for Kaipara' and considers this sends an unbalanced message on what the Proposed District Plan is prioritising.
149.6	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Environment	Amend	<p>AMEND SD-NE-O2 as follows:</p> <p>Coastal environment, <u>water bodies and their margins</u></p>	<ul style="list-style-type: none"> Section 6(a) requires that the preservation of natural character extends to wetlands, lakes, rivers, waterbody margins and the coastal environment. As proposed, SD-NE-O2 only relates to natural character within the coastal

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				<p>The natural character of the coastal environment, <u>wetlands, lakes and rivers and their margins are</u> is preserved, <u>restored</u> and protected from inappropriate subdivision, use and development.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<p>environment. Therefore, all areas of natural character included in s6(a) are not recognised nor provided for.</p> <ul style="list-style-type: none"> Section 7(f) requires particular regard to be given by Council to the maintenance and enhancement of the environment. National Policy Statement for Freshwater Management and New Zealand Coastal Policy Statement seek the management of freshwater to ensure the health and wellbeing of freshwater waterbodies and ecosystems. Moreover, Policy 14 of the New Zealand Coastal Policy Statement requires that Councils promote the restoration or rehabilitation of natural character within the coastal environment. As proposed, SD-NE-O2 only mentions preservation and protection. The submitter requests that this objective is amended in order to give effect to s6 and 7 of the Resource Management Act and relevant National Policy Statement.
149.7	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Environment	Amend	<p>ADD a new Strategic Direction - Natural Environment objective (SD-NE-O4) as follows:</p> <p><u>Subdivision, use and development is managed so the health and well-being of water bodies, freshwater ecosystems, and coastal water quality are maintained and improved (where degraded).</u></p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter considers that additional Strategic Direction - Natural Environment objectives are required in order to give effect to the National Policy Statement for Freshwater Management, New Zealand Coastal Policy Statement and National Policy Statement for Indigenous Biodiversity. The objective proposed recognises the interconnectedness of subdivision, land use and development, and the wellbeing of the natural environment. Notably, the health and wellbeing of freshwater bodies and ecosystems, coastal waters and indigenous biodiversity. These new objectives should relate to: <ul style="list-style-type: none"> the health and wellbeing of water bodies and freshwater ecosystems; coastal water quality; increasing indigenous biodiversity cover; natural environment resilience to climate change.
149.8	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Environment	Amend	<p>ADD a new Strategic Direction - Natural Environment objective (SD-NE-O5) as follows:</p> <p><u>Our indigenous vegetation cover increases in our urban and non-urban environments.</u></p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter considers that additional Strategic Direction - Natural Environment objectives are required in order to give effect to the National Policy Statement for Freshwater Management, New Zealand Coastal Policy Statement and National Policy Statement for Indigenous Biodiversity. The objective proposed recognises the interconnectedness of subdivision, land use and development, and the wellbeing of the natural environment. Notably, the health and wellbeing of freshwater bodies and ecosystems, coastal waters and indigenous biodiversity. These new objectives should relate to: <ul style="list-style-type: none"> The health and wellbeing of water bodies and freshwater ecosystems Coastal water quality Increasing indigenous biodiversity cover Natural environment resilience to climate change.
149.9	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Environment	Amend	<p>ADD a new Strategic Direction - Natural Environment objective (SD-NE-O6) as follows:</p> <p><u>Our indigenous species are resilient to the effects of climate change and natural adjustments of habitats, species and ecosystems to the changing climate are supported.</u></p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter considers that additional Strategic Direction - Natural Environment objectives are required in order to give effect to the Freshwater Management, New Zealand Coastal Policy Statement and National Policy Statement for Indigenous Biodiversity. The objective proposed recognises the interconnectedness of subdivision, land use and development, and the wellbeing of the natural environment. Notably, the health and wellbeing of freshwater bodies and ecosystems, coastal waters and indigenous biodiversity. These new objectives should relate to: <ul style="list-style-type: none"> the health and wellbeing of water bodies and freshwater ecosystems coastal water quality increasing indigenous biodiversity cover natural environment resilience to climate change.

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149.10	Royal Forest and Bird Protection Society of New Zealand Incorporated	Urban Form and Development	Amend	<p>ADD a new Strategic Direction Urban Form and Development objective (SD-UFD-O6) as follows:</p> <p><u>Our existing and new urban environments are well- functioning urban environments.</u></p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The National Policy Statement for Urban Development requires urban environments to be well-functioning and resilient to the effects of climate change and Policy 14 of the National Policy Statement for Indigenous Biodiversity seeks that Councils to promote an increase in urban environment vegetation cover. The submitter considers that well-functioning urban environments should have access to natural space and vegetation cover to reduce urban heat island effects, as well as slow stormwater, thus aiding in making urban environments climate change resilient. Considering this, the submitter believes that the Proposed District Plan Strategic direction should include such direction.
149.11	Royal Forest and Bird Protection Society of New Zealand Incorporated	Urban Form and Development	Amend	<p>ADD a new Strategic Direction Urban Form and Development Objective (SD-UFD-O7) as follows:</p> <p><u>Provide space for indigenous biodiversity by using nature based solutions and by increasing indigenous vegetation cover, as a key aspect of urban form and development.</u></p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The National Policy Statement for Urban Development requires urban environments to be well-functioning and resilient to the effects of climate change and Policy 14 of the National Policy Statement for Indigenous Biodiversity seeks that Councils to promote an increase in urban environment vegetation cover. The submitter considers that well-functioning urban environments should have access to natural space and vegetation cover to reduce urban heat island effects, as well as slow stormwater, thus aiding in making urban environments climate change resilient. Considering this, the submitter believes that the Proposed District Plan Strategic direction should include such direction.
149.12	Royal Forest and Bird Protection Society of New Zealand Incorporated	Definitions	Amend	<p>ADD a definition for "Well-functioning Urban Environments" consistent with the definition in Policy 1 of the National Policy Statement for Urban Development.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The National Policy Statement for Urban Development requires urban environments to be well-functioning and resilient to the effects of climate change and Policy 14 of the National Policy Statement for Indigenous Biodiversity seeks that Councils to promote an increase in urban environment vegetation cover. The submitter considers that well-functioning urban environments should have access to natural space and vegetation cover to reduce urban heat island effects, as well as slow stormwater, thus aiding in making urban environments climate change resilient. Considering this, the submitter believes that the Proposed District Plan Strategic direction should include such direction.
149.13	Royal Forest and Bird Protection Society of New Zealand Incorporated	Financial Contributions	Amend	<p>ADD Policies which recognise the principles and criteria for biodiversity offsetting and compensation, as well as the limits to when such measures can be applied. Provisions should include clear reference to the application of the Ecosystems and Biodiversity chapter, if financial contributions extend to biodiversity offsetting and compensation.</p> <p>OR</p> <p>AMEND Policies to recognise the principles and criteria for biodiversity offsetting and compensation, as well as the limits to when such measures can be applied. Provisions should be amended to include clear reference to the application of the Ecosystems and Biodiversity chapter, if financial contributions extend to biodiversity offsetting and compensation.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes Financial Contribution Objectives and Policies (inferred) in part and does not consider it clear whether financial contributions are intended as to include biodiversity compensation. If biodiversity compensation is included, then guidance is required as to how offset and compensation principles within the National Policy Statement on Indigenous Biodiversity and National Policy Statement on Freshwater Management apply. Limitations to when biodiversity offsetting or compensation is appropriate should also be recognised.
149.14	Royal Forest and Bird Protection Society of New Zealand Incorporated	Renewable Electricity Generation	Amend	<p>AMEND the Overview to the Renewable Electricity Generation chapter to include "<u>maintenance, operations and upgrading of renewable electricity generation</u>" in the section describing where potential adverse effects on the environment may arise.</p> <p>AND</p> <p>RETAIN the explanation of other Part 2 provisions applying in the Overview to the Renewable Electricity Generation chapter.</p> <p>AND</p>	<ul style="list-style-type: none"> The submitter requests that 'maintenance, operations and upgrading' are added to the Overview as these activities can result in adverse effects on the environment and, as such, should be included. Detailed cross-referencing is requested in order to ensure the Proposed District Plan is clear and effective.

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				<p>ADD more detailed cross-referencing to other Part 2 chapters in the Note.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	
149.15	Royal Forest and Bird Protection Society of New Zealand Incorporated	Renewable Electricity Generation	Amend	<p>AMEND REG-O1 as follows:</p> <p>The benefits of increasing renewable electricity generation activities at all scales are realised <u>recognised</u>.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> REG-O1 needs to be moderated as, in some cases, the benefits of enabling renewable electricity generation cannot be 'realised' due to there being significant adverse environmental effects which need to be avoided to achieve the purpose of the Resource Management Act. The submitter requests that 'recognised' is used in place of 'realised' to moderate REG-O1 and align it with the National Policy Statement for Renewable Electricity Generation.
149.16	Royal Forest and Bird Protection Society of New Zealand Incorporated	Renewable Electricity Generation	Amend	<p>AMEND REG-O2 as follows:</p> <p>Renewable electricity generation activities are enabled at all scales to <u>where they</u> support the environmental, economic, social and cultural well-being of people and communities in the Kaipara District.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> REG-O2 needs to be moderated by changing 'to' to 'where' in order to align it with the National Policy Statement for Renewable Electricity Generation.
149.17	Royal Forest and Bird Protection Society of New Zealand Incorporated	Renewable Electricity Generation	Oppose	<p>AMEND REG-P4 as follows:</p> <p>Manage the adverse effects of renewable electricity generation activities by:</p> <ol style="list-style-type: none"> Recognising that there will <u>may</u> be unavoidable adverse effects on the environment from renewable electricity generation activities; <u>Considering whether the proposed location is appropriate having regard to the scale of adverse effects</u> Implementing effective mitigation measures, which may include: <ol style="list-style-type: none"> Appropriate <u>location and design</u>; Screening and setbacks from sensitive activities; Adaptive management measures; Rehabilitation of the site at the end of its operational life; and Having regard to any proposed offsetting or compensation measures for <u>residual</u> adverse effects that cannot <u>practicably</u> be avoided, remedied or mitigated. <p>AND</p> <p>DELETE REG-P4.3 (would be renumbered '4' as per amendments requested above).</p> <p>OR</p> <p>AMEND REG-P4 to include a reference to other relevant chapters such as Ecosystems and Biodiversity which set out how and which effects are to be avoided, remedied or mitigated.</p> <p>AND</p> <p>PROVIDE clarity as to what offsetting and compensation can be provided by REG-P4 and whether this is intended to be biodiversity offsetting.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes REG-P4 as proposed and considers it to be inappropriate and risks undermining effects management frameworks under the Resource Management Act and National Policy Statement for Renewable Electricity Generation. Stating there will be unavoidable effects pre-emptively justifies adverse outcomes otherwise avoided, remedied or mitigated. It is considered that this approach is inconsistent with Section 5(2)(c) of the act. The National Policy Statement for Renewable Electricity Generation expressly supports the development of renewable electricity generation but not at the expense of managing environmental effects. National Policy Statement for Renewable Electricity Generation Policy C2 requires that decision-makers have particular regard to offsetting and environmental compensation measures for any residual adverse effects after avoidance, mitigation and remediation. REG-P4 should enable the consideration of sensitive environments (e.g., riparian margins, Coastal Environment, Outstanding Natural Features and Landscapes, and indigenous habitats), in which locating activities may be inappropriate. The submitter also opposes the use of practicably in REG-P4(3) and considers this inappropriate and inconsistent with the Resource Management Act and National Policy Statement for Renewable Electricity Generation. Neither uses 'practicably' as a qualifier to manage adverse effects. Moreover, the word introduces ambiguity into the provision and could allow financial considerations to override the application of effects management frameworks - as set out elsewhere in the plan. To be consistent with Policy C2 of the National Policy Statement for Renewable Electricity Generation, REG-P4 should also refer to residual effects.
149.18	Royal Forest and Bird Protection Society of New Zealand Incorporated	Renewable Electricity Generation	Amend	<p>AMEND REG-P8 as follows:</p> <p>Recognise the benefits of enabling the repowering of existing wind and solar renewable electricity generation activities, including:</p> <ol style="list-style-type: none"> Efficient use of existing infrastructure; and 	<ul style="list-style-type: none"> The submitter opposes REG-P8 in part as repowering can increase the scale of renewable electricity generation activities, therefore potentially increasing the scale of associated effects. REG-P8 must recognise this and provide adequate direction.

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				<p>2. Potential for delivering increased renewable electricity generation output within an existing renewable electricity generation site.</p> <p><u>Where repowering increases the magnitude and scale of effects, avoid, remedy or mitigate any adverse effects on the environment in accordance with REG-P4.</u></p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	
149.19	Royal Forest and Bird Protection Society of New Zealand Incorporated	Renewable Electricity Generation	Oppose	<p>AMEND REG-P10 to make the reference to 'the need for flexibility' clearer,</p> <p>AND</p> <p>AMEND REG-P10 as follows:</p> <p>Enable activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation (i.e. wind monitoring masts), recognising:</p> <ol style="list-style-type: none"> 1. Both the need for flexibility and 2. The temporary nature of any adverse effects of these activities. 3. <u>That in some sensitive locations and</u> 4. <u>Environments such activities will not be</u> 5. <u>Appropriate.</u> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> • The submitter opposes REG-P10 and requests amendments for clarity. The investigation of new sites and sources can decide the location of renewable electricity generation activities. In some areas, such activities will be inappropriate. E.g. within an Outstanding Natural Features or Landscape, the Coastal Environment or areas featuring significant indigenous vegetation. REG-P10 requires amendment to recognise this. Moreover, it is unclear as to why there is reference to 'the need for flexibility', and what matters require flexibility.
149.20	Royal Forest and Bird Protection Society of New Zealand Incorporated	Renewable Electricity Generation	Oppose	<p>AMEND Renewable Electricity Generation rules so that activities are not enabled in overlays and sensitive environments.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> • The submitter opposes Renewable Electricity Generation rules as notified owing to some activities applying in all zones and, in some cases, this is considered inappropriate. Notably, renewable electricity generation activities are not appropriate within Outstanding Natural Features and Landscapes, the Coastal Environment, or areas supporting indigenous biodiversity. These areas are to be protected from inappropriate subdivision, use and development.
149.21	Royal Forest and Bird Protection Society of New Zealand Incorporated	Renewable Electricity Generation	Oppose	<p>AMEND REG-R2 so it only applies to permitted and lawfully established renewable electricity generation activities.</p> <p>AND</p> <p>ADD performance standards to REG-R2 that seek to:</p> <ul style="list-style-type: none"> • Limit the intensity, nature and scale of effects resulting from operation, maintenance and repair activities. • Avoid or manage disturbance to sensitive environments or features. • Require appropriate site reinstatement where land is disturbed. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> • The submitter opposes REG-R2 as proposed and considers that the rule should only apply to permitted or lawfully established renewable electricity generation activities. This is because consented activity conditions can prevail over REG-R2. The submitter is also concerned that REG-R2 permits the operation, maintenance and repair of existing renewable electricity generation infrastructure in all zones without any associated standards or conditions and considers the absence of standards poses risk. Activities associated with renewable electricity generation can result in adverse effects, notably within sensitive environments (e.g., areas featuring identified ecological, cultural or landscape values). • Standards are required as a mechanism to manage or limit potential adverse effects, including but not limited to, noise, traffic, vegetation disturbance, ecological and cultural effects.
149.22	Royal Forest and Bird Protection Society of New Zealand Incorporated	Renewable Electricity Generation	Amend	<p>ADD a new restricted discretionary or discretionary activity rule to the Renewable Electricity Generation chapter for operation, maintenance, or repair activities that do not meet permitted standards.</p> <p>AND</p> <p>ADD matters of discretion to the new rule (if restricted discretionary) relating to the nature and scale of the works, effects on the environment and surrounding land uses, as well as any measures to avoid, remedy or mitigate effects.</p> <p>AND</p>	<ul style="list-style-type: none"> • A new rule is sought as part of the relief requested regarding REG-R2. A new rule would manage those activities not lawfully established or permitted. There are no further reasons provided for the addition of this new rule. As such, the submitter's opposition to REG-R2 is reproduced below: • The submitter opposes REG-R2 as proposed and considers that the Rule should only apply to permitted or lawfully established renewable electricity generation activities. This is because consented activity conditions can prevail over REG-R2. The submitter is also concerned that REG-R2 permits the operation, maintenance and repair of existing renewable electricity generation infrastructure in all zones without any associated standards or conditions and considers the

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				Any consequential amendments and alternative relief to address the concerns raised.	<p>absence of standards poses risk. Activities associated with renewable electricity generation can result in adverse effects, notably within sensitive environments (e.g., areas featuring identified ecological, cultural or landscape values).</p> <ul style="list-style-type: none"> Standards are required as a mechanism to manage or limit potential adverse effects, including but not limited to, noise, traffic, vegetation disturbance, ecological and cultural effects.
149.23	Royal Forest and Bird Protection Society of New Zealand Incorporated	Renewable Electricity Generation	Amend	<p>AMEND REG-R1 to include standards relating to the management of effects on indigenous fauna, such as:</p> <ul style="list-style-type: none"> Reflectiveness and angle of materials to manager glare and glint; and Height, blade length, colour and lighting to avoid attracting wildlife. <p>AND</p> <p>ADD 'effects on indigenous biological diversity' to REG-R1 as a matter of discretion.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes REG-R1 in part as turbines can result in adverse effects on wildlife. Amendments to REG-R1 are requested to manage such effects, such as including consideration of effects on indigenous species within the matters of discretion.
149.24	Royal Forest and Bird Protection Society of New Zealand Incorporated	Renewable Electricity Generation	Amend	<p>AMEND REG-R3 to include standards relating to the management of effects on indigenous fauna, such as:</p> <ul style="list-style-type: none"> Reflectiveness and angle of materials to manage glare and glint; and Height, blade length, colour and lighting to avoid attracting wildlife. <p>AND</p> <p>ADD 'effects on indigenous biological diversity' to REG-R3 as a matter of discretion.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes REG-R3 in part as turbines can result in adverse effects on wildlife. Amendments to REG-R3 are requested to manage such effects, such as including consideration of effects on indigenous species within the matters of discretion.
149.25	Royal Forest and Bird Protection Society of New Zealand Incorporated	Renewable Electricity Generation	Amend	<p>AMEND REG-R4 to include standards relating to the management of effects on indigenous fauna, such as:</p> <ul style="list-style-type: none"> Reflectiveness and angle of materials to manage glare and glint; and Height, blade length, colour and lighting to avoid attracting wildlife. <p>AND</p> <p>ADD 'effects on indigenous biological diversity' to REG-R4 as a matter of discretion.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes REG-R4 in part as solar panel glint and glare can result in adverse effects on wildlife. Amendments to REG-R3 are requested to manage such effects, such as requiring the use of non-reflective materials for solar generation and including consideration of effects on indigenous species within the matters of discretion.
149.26	Royal Forest and Bird Protection Society of New Zealand Incorporated	Infrastructure	Amend	<p>AMEND INF-P1 to expressly recognise that infrastructure must be located and designed to avoid, remedy, or mitigate adverse effects on the environment and significant values.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes enabling infrastructure policies INF-P1 to P4 in part and considers each lacks sufficient recognition of both site and area-specific constraints and characteristics, including matters of national importance under Section 6 Resource Management Act. The submitter acknowledges that infrastructure is essential, but considers that its development must protect significant values, including indigenous biodiversity and natural character. To have unqualified enabling policies will potentially undermine values that require active protection.
149.27	Royal Forest and Bird Protection	Infrastructure	Oppose	<p>AMEND INF-P5 so it clearly states that infrastructure will only be enabled in sensitive</p>	<ul style="list-style-type: none"> The submitter opposes INF-P5 as proposed and considers that it enables regionally significant

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	Society of New Zealand Incorporated			<p>areas where values are protected and the activity does not result in inappropriate subdivision, use, or development.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<p>infrastructure in sensitive environments without meeting Section 6 Resource Management Act protection requirements. Such an enabling policy risks undermining protection requirements, resulting in potential significant adverse effects on natural character, landscape values, and indigenous biodiversity.</p> <ul style="list-style-type: none"> It is requested that INF-P5 is tempered so as to ensure infrastructure is only enabled where appropriate and to achieve consistency with protective direction in s6 and the New Zealand Coastal Policy Statement and National Policy Statement for Indigenous Biodiversity.
149.28	Royal Forest and Bird Protection Society of New Zealand Incorporated	Infrastructure	Amend	<p>AMEND INF-P6 by replacing 'minimise' with 'avoid, remedy or mitigate'.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes INF-P6 in part as 'minimise' is not defined, thus introduces ambiguity into the provision. This can result in significant adverse effects persisting so long as they are minimised, rather than being avoided, remedied or mitigated as per Section 5 Resource Management Act.
149.29	Royal Forest and Bird Protection Society of New Zealand Incorporated	Infrastructure	Amend	<p>AMEND INF-P15 to clearly state protection of values in relation to waterbodies, freshwater ecosystems, coastal water quality, and prioritising health and wellbeing of water and ecosystems.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> Policies 22 and 23 of the New Zealand Coastal Policy Statement and Policies 3 and 5 of the National Policy Statement for Freshwater Management require specific outcomes for stormwater and wastewater discharges. The submitter considers that Infrastructure policies should be amended to reflect Policies 22 and 23 of the New Zealand Coastal Policy Statement and Policies 3 and 5 of the National Policy Statement for Freshwater Management, in order for the Proposed District Plan to give effect to national direction.
149.30	Royal Forest and Bird Protection Society of New Zealand Incorporated	Infrastructure	Oppose	<p>AMEND INF-P18 in order to:</p> <ul style="list-style-type: none"> Give effect to s6(a) and (c) Resource Management Act, the National Policy Statement for Freshwater Management and the National Policy Statement on Indigenous Biodiversity (particularly protection and prioritisation of water bodies/ecosystems health and wellbeing and maintaining and enhancing indigenous biodiversity). Require new infrastructure to preserve natural character, support the health of freshwater ecosystems and prioritise nature-based solutions. Require maintenance and upgrading of existing infrastructure to progressively restore natural character and indigenous biodiversity. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes INF-P18 as proposed. The Policy does not fully give effect to s6(a) and (c) Resource Management Act, Policies 1, 3, and 5 of the National Policy Statement for Freshwater Management or the National Policy Statement on Indigenous Biodiversity. All of which require the preservation of natural character, the protection of significant indigenous vegetation and habitats, and the prioritisation of water bodies and freshwater ecosystem health and wellbeing. Historic flood management practices such as channelisation, stop bank construction and indigenous vegetation clearance have degraded the natural character and ecological integrity of water bodies. It is acknowledged that the continued operation of flood infrastructure is necessary, but this continued operation presents an opportunity to restore values. The submitter considers that Infrastructure policy direction should ensure new and existing flood infrastructure adopts nature-based solutions to avoid further degradation, and support progressive restoration of natural character and indigenous biodiversity.
149.31	Royal Forest and Bird Protection Society of New Zealand Incorporated	Infrastructure	Amend	<p>AMEND the Infrastructure Rules Note to include more detailed cross-referencing to other chapters in Part 2.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter requests more detailed cross-referencing is included to ensure the plan is clear and effective. Cross-referencing should be to applicable sections, including Natural Environment Values and General District-Wide Matters.
149.32	Royal Forest and Bird Protection Society of New Zealand Incorporated	Infrastructure	Amend	<p>AMEND the Infrastructure rules, including rule standards and matters of discretion, to expressly recognise and manage the potential adverse effects of infrastructure on natural character, indigenous biodiversity, and other identified values.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes Infrastructure rules in part and notes that all infrastructure activities can have adverse effects on natural character, indigenous biodiversity, environmental and cultural values. As proposed, the submitter does not consider Infrastructure rules fully recognise or respond to potential effects. Without amendment, this may lead to adverse effects not being appropriately avoided, remedied, or mitigated.
149.33	Royal Forest and Bird Protection Society of New Zealand Incorporated	Transport	Amend	<p>ADD introductory text, objectives, policies and rules to the Transport chapter to recognise transport corridors as opportunities to enhance indigenous vegetation and biodiversity in accordance with the National Policy Statement on Indigenous Biodiversity</p>	<ul style="list-style-type: none"> Transport infrastructure corridors can offer valuable opportunities to positively contribute to environmental outcomes. The submitter notes that transport corridors in particular can be used to increase indigenous vegetation cover and maintain street trees in such a way whereby

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				and manage stormwater through nature-based solutions that support Te Mana o te Wai. AND Any consequential amendments and alternative relief to address the concerns raised.	National Policy Statement on Indigenous Biodiversity objectives are implemented. Corridors can also be important for the management and treatment of stormwater in accordance with the National Policy Statement for Freshwater Management, therefore supporting the achievement of Te Mana o te Wai. • The submitter requests that this potential is recognised in the Transport introductory text, objectives, policies and rules.
149.34	Royal Forest and Bird Protection Society of New Zealand Incorporated	Notable Trees	Amend	AMEND TREE-P2.1. as follows: 1. Ensure the continuing health, structural integrity and amenity value values of the tree; AND Any consequential amendments and alternative relief to address the concerns raised.	• As drafted, TREE-P2.1. requires activities to ensure continuing the 'amenity value' of a tree; however, TREE-O1 outlines how values associated with notable trees go beyond amenity, including ecological, cultural, visual and historical value. In order to achieve internal consistency and protection of notable trees, the submitter requests that TREE-P2 is amended to refer to all values, as identified in TREE-O1.
149.35	Royal Forest and Bird Protection Society of New Zealand Incorporated	Notable Trees	Amend	ADD the following clause to TREE-P3 to be consistent with amended TREE-P2.1.: <u>Ensure the continuing health, structural integrity and values of the tree.</u> AND Any consequential amendments and alternative relief to address the concerns raised.	• The submitter considers that maintenance and pruning can affect the health, structural integrity and values of a notable tree. By inserting Clause 1 from TREE-P2 (as amended by the submitter), 'values' will be reflected.
149.36	Royal Forest and Bird Protection Society of New Zealand Incorporated	Notable Trees	Amend	AMEND TREE-R1 to specify an activity status where performance standards are not met. AND Any consequential amendments and alternative relief to address the concerns raised.	• There is no activity status for the specified rules for when performance standards are not met. This creates ambiguity for plan users and decision-makers and risks undermining the rule framework.
149.37	Royal Forest and Bird Protection Society of New Zealand Incorporated	Ecosystems and Indigenous Biodiversity	Oppose	AMEND the identification of Significant Natural Areas into the Proposed District Plan using the criteria in Appendix 5 of the Regional Policy Statement and using comparable approaches as a model, such as the Napier City Council's Ecosystem and Indigenous Biodiversity Plan Variation. OR ADD an objective regarding the identification of areas through new subdivision, use and development proposals using the Regional Policy Statement Appendix 5 criteria. AND ADD a method and provide a specified timeframe for identifying significant natural areas across the District and a schedule included within the plan and maps. AND Any consequential amendments and alternative relief to address the concerns raised.	• The submitter opposes the Proposed District Plan not having identified areas of significant indigenous vegetation or significant habitats of indigenous fauna. The submitter acknowledges that recent Resource Management Act amendments have temporarily paused the requirement to identify Significant Natural Areas under the National Policy Statement for Indigenous Biodiversity, it does not consider this 'pause' removes Council's existing obligations under the Resource Management Act, National Policy Statement for Indigenous Biodiversity and Regional Policy Statement. • The Regional Policy Statement provides clear direction on safeguarding significant indigenous vegetation and the habitats of indigenous fauna. Specifically, Objective 3.4 of the Regional Policy Statement, which s75(3)(c) Resource Management Act requires the Proposed District Plan gives effect to. Moreover, Appendix 5 of the Regional Policy Statement sets out criteria for determining significance. The submitter considers that Identifying Significant Natural Areas within the Kaipara District is critical to ensure such areas are protected in order to maintain indigenous biodiversity. If Significant Natural Areas are not mapped, this reduces clarity for landowners and decision-makers, therefore increasing the risk of unintentional biodiversity loss.
149.38	Royal Forest and Bird Protection Society of New Zealand Incorporated	Ecosystems and Indigenous Biodiversity	Amend	AMEND ECO-O1 as follows: Areas of significant indigenous vegetation and significant habitats of indigenous fauna are protected <u>from clearance, modification, degradation, fragmentation, and inappropriate use, subdivision, and development.</u> AND Any consequential amendments and alternative relief to address the concerns raised.	• The submitter supports the direction of this provision but considers it could benefit from further clarity. It is not clear what pressures or activities the values are to be protected from. As such, the submitter requests that ECO-O1 is amended to reference the type of activities from which significant indigenous vegetation and significant habitats of indigenous fauna should be protected. This will result in the objective being clear, directive and ultimately better aligned with outcomes anticipated under the Resource Management Act and National Policy Statement for Indigenous Biodiversity.

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149.39	Royal Forest and Bird Protection Society of New Zealand Incorporated	Ecosystems and Indigenous Biodiversity	Amend	<p>ADD objectives to the Ecosystems and Indigenous Biodiversity chapter regarding the following matters to give effect to the National Policy Statement for Indigenous Biodiversity:</p> <ul style="list-style-type: none"> • Indigenous biodiversity that is not significant (National Policy Statement for Indigenous Biodiversity Policy 8) • Identifying areas that support indigenous biodiversity (National Policy Statement for Indigenous Biodiversity Policies 6, 15 and 17) • Resilience of indigenous biodiversity to the effects of climate change (National Policy Statement for Indigenous Biodiversity Policy 4) • Increasing indigenous vegetation cover (National Policy Statement for Indigenous Biodiversity Policy 14) • Recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity (National Policy Statement for Indigenous Biodiversity Objective and Policy 2) • Specified highly mobile fauna (National Policy Statement for Indigenous Biodiversity Policy 15) • Required application of the effects management hierarchy to manage effects on indigenous biodiversity and demonstration of application by applicants in accordance with National Policy Statement for Indigenous Biodiversity clauses 3.10, 3.11, 3.15 and 3.16. • Required application of the biodiversity offsetting and compensation principles in National Policy Statement for Indigenous Biodiversity Appendix 3 and 4. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> • The submitter's overarching submission points seek new objectives, and related policies are added to the Proposed District Plan in order to give effect to the National Policy Statement for Indigenous Biodiversity. New provisions should be a comprehensive package in order to ensure the protection and maintenance of indigenous biodiversity is achieved.
149.40	Royal Forest and Bird Protection Society of New Zealand Incorporated	Ecosystems and Indigenous Biodiversity	Amend	<p>AMEND ECO-P1.1. to include or list of all New Zealand Coastal Policy Statement Policy 11(a) matters.</p> <p>AND</p> <p>AMEND ECO-P1.2. to include or list of all New Zealand Coastal Policy Statement Policy 11(b) matters.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> • The submitter supports ECO-P1 in part, but requests that the full scope of the New Zealand Coastal Policy Statement Policy 11 should be included in ECO-P1. As proposed, ECO-P1 does not feature the full suite of New Zealand Coastal Policy Statement matters, nor the effects management required. Therefore, ECO-P1 does not give effect to the New Zealand Coastal Policy Statement and requires amendment.
149.41	Royal Forest and Bird Protection Society of New Zealand Incorporated	Ecosystems and Indigenous Biodiversity	Oppose	<p>AMEND the Ecosystems and Indigenous Biodiversity chapter to ensure that the revised policies reflect the ongoing requirement to give effect to the Resource Management Act, including s6(c) and 7(d).</p> <p>AND</p> <p>AMEND the Ecosystems and Indigenous Biodiversity chapter to include appropriate cross-referencing to other parts of the plan that support these outcomes, such as provisions that maintain biodiversity outside significant areas or promote increasing indigenous vegetation cover.</p> <p>AND</p> <p>RETAIN ECO-P2.1. as notified and consider adding additional ecological areas of importance for protection.</p> <p>AND</p> <p>AMEND ECO-P2.1.b. by adding reference to Northland Regional Policy Statement criteria for the identification of areas that meet s6 of the Resource Management Act.</p> <p>AND</p> <p>AMEND ECO-P2.2. as follows:</p>	<ul style="list-style-type: none"> • The submitter opposes ECO-P2 as proposed and considers it is too broad and does not fully give effect to key provisions of the National Policy Statement for Indigenous Biodiversity. Specifically, Clauses 3.10 to 3.17. The submitter acknowledges the identification of Significant Natural Areas is currently being on hold; however, the National Policy Statement for Indigenous Biodiversity direction remains in force and should be implemented. Moreover, s6(c) and s7(d) Resource Management Act apply and require Kaipara District Council to recognise and provide for the protection of significant indigenous vegetation and habitats of indigenous fauna. As well as having particular regard to the intrinsic values of ecosystems. • It is requested that the Proposed District Plan policy framework is revised to include and protect additional ecological areas.

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				<p>2. Avoid, remedy, or mitigate, offset or compensate adverse effects of subdivision, land use and development to ensure there are no significant adverse effects on:</p> <p>a. Areas of predominantly indigenous vegetation; and</p> <p>b. Indigenous species, habitats and ecosystems that are important for recreational, commercial, traditional or cultural purposes or are particularly vulnerable to modification.</p> <p>c. <u>Ecological corridors, and areas important for linking or maintaining biological values identified under this policy.</u></p> <p>3. <u>Where clauses 1 and 2 are met, ensure that any other adverse effects on indigenous biodiversity are avoided, remedied or mitigated as far as practicable, then consider biodiversity offsetting or if offsetting is not possible, biodiversity compensation of more than minor residual adverse effects.</u></p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	
149.42	Royal Forest and Bird Protection Society of New Zealand Incorporated	Ecosystems and Indigenous Biodiversity	Oppose	<p>AMEND ECO-P3 to reframe the policy so its primary focus is on the protection and maintenance of this indigenous biodiversity. Rather than providing for activities which could conflict with these outcomes.</p> <p>AMEND the Proposed District Plan to ensure any enabling provisions are clearly subordinate to the overarching protection and maintenance outcomes o give effect to the National Policy Statement for Indigenous Biodiversity and Regional Policy Statement.</p> <p>AND</p> <p>AMEND ECO-P3 by splitting the policy into two or more distinct policies—one focused on setting out the biodiversity protection and maintenance outcomes in line with the National Policy Statement for Indigenous Biodiversity and Regional Policy Statement and another dealing with specific circumstances where limited adverse effects may be acceptable, as set out in the National Policy Statement for Indigenous Biodiversity, such as established activities or maintenance of improved pasture for farming.</p>	<ul style="list-style-type: none"> The policy, while referencing the protection of significant indigenous vegetation and habitats of indigenous fauna, is primarily around accepted effects. The emphasis appears to be on enabling subdivision, land use and development—particularly for primary production, infrastructure, and broader wellbeing—rather than providing clear direction to protect and maintain indigenous biodiversity, as required by section 6(c) of the Resource Management Act and the National Policy Statement for Indigenous Biodiversity. This framing risks undermining the plan's ability to give full effect to both the Resource Management Act and the National Policy Statement for Indigenous Biodiversity, which require adverse effects on biodiversity to be managed to protect significant indigenous biodiversity.
149.43	Royal Forest and Bird Protection Society of New Zealand Incorporated	Ecosystems and Indigenous Biodiversity	Oppose	<p>AMEND ECO-P4 to:</p> <ul style="list-style-type: none"> Reflect the restoration direction in clause 3.21 of the National Policy Statement for Indigenous Biodiversity; Prioritise restoration in areas in accordance with clause 3.21 of the National Policy Statement for Indigenous Biodiversity; Provide for the use of consent or designation conditions to secure restoration where new use and development is proposed.; and Encourage uses to refer to the identification of areas meeting the Regional Policy Statement significance criteria in the report prepared by Wildlands for the Council. <p>Include Council's intent to continue ground truthing the areas identified as meeting Regional Policy Statement significance criteria in the Wildlands report (see reference earlier in these submissions).</p>	<ul style="list-style-type: none"> The policy does not give full effect to clause 3.21 of the National Policy Statement for Indigenous Biodiversity, which sets specific expectations around restoration. These include the reconstruction of degraded areas, prioritising restoration in key locations, and applying conditions on resource consents and designations to support restoration outcomes for priority areas.
149.44	Royal Forest and Bird Protection Society of New Zealand Incorporated	Ecosystems and Indigenous Biodiversity	Oppose	<p>RETAIN the permitted rule approach of ECO-R1 being for specified purposes only.</p> <p>AND</p> <p>DELETE ECO-R1.b. and .f.</p> <p>AND</p> <p>DELETE ECO-R1.h.</p> <p>AND</p>	<ul style="list-style-type: none"> The submitter opposes ECO-R1 as proposed. The rule permits too broad of a range of indigenous vegetation clearance activities without requirements to manage adverse effects. The submitter considers ECO-R1 risks undermining the protection and maintenance of indigenous biodiversity by providing a blanket permitted activity status for clearance, which is concerning given the Proposed District Plan does not map significant areas which otherwise could

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				<p>AMEND ECO-R1.j. to ensure it is not abused by limiting functions under appropriate acts or services.</p> <p>AND</p> <p>AMEND ECO-R1.l. to include limits on the extent of clearance (e.g., within 1m).</p> <p>AND</p> <p>AMEND ECO-R1 so it does not enable unlimited total area of clearance of vegetation or land disturbance by permitted activities to any degree not intended by the National Policy Statement for Indigenous Biodiversity.</p> <p>AND</p> <p>AMEND ECO-R1 to apply area clearance limits over the plan's lifetime or a 12-month period where appropriate.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<p>be excluded from this rule. There is no requirement for an assessment of the vegetation being cleared, nor are there any limits imposed based on ecological context, habitat types, or Significant Natural Area connection. The submitter considers this approach could result in incremental loss of indigenous vegetation throughout Kaipara.</p> <ul style="list-style-type: none"> • More specifically, ECO-R1.d. should be deleted as new walking tracks might not be appropriate within areas that meet Regional Policy Statement significance criteria and could result in spread of Kauri Dieback. ECO-R1.h. should also be deleted as Council has responsibilities to protect and maintain biodiversity. Finally, clearance limits should be applied over the plan's lifetime or subject to 2-month periods to ensure any permitted clearance and disturbance is appropriately managed in order to protect and maintain biodiversity.
149.45	Royal Forest and Bird Protection Society of New Zealand Incorporated	Ecosystems and Indigenous Biodiversity	Amend	<p>ADD a new restricted discretionary Ecosystems and Indigenous Biodiversity rule for clearance and land disturbance that does not meet limit standards (as sought in the previous submission points) with the following matters of discretion:</p> <ul style="list-style-type: none"> • Effects of vegetation clearance and associated land disturbance on indigenous biodiversity; • Extent of clearance proposed and any practicable alternative locations or methods to avoid or reduce the extent of indigenous vegetation clearance and associated land disturbance; • Measures proposed to avoid, remedy, mitigate, offset or compensate adverse effects on indigenous biodiversity values; • Reasons for the indigenous vegetation clearance and associated land disturbance; and • Any positive effects associated with the indigenous vegetation clearance and associated land disturbance. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> • The submitter requests a new restricted discretionary rule is added to manage clearance and land disturbance that does not meet relevant standards.
149.46	Royal Forest and Bird Protection Society of New Zealand Incorporated	Ecosystems and Indigenous Biodiversity	Oppose	<p>DELETE Rule ECO-R2.</p> <p>OR</p> <p>AMEND ECO-R2 so the rule only applies outside of areas identified in the Wildlands Report as meeting Regional Policy Statement significance criteria.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> • The submitter opposes ECO-R2 and requests it is either deleted or amended to only apply outside of identified areas. As proposed, ECO-R2 applies to broad 'per-event' thresholds and does not adequately safeguard areas or manage cumulative effects. The submitter does not consider this approach to be appropriate, especially as no areas of significant indigenous biodiversity have been identified. • The submitter considers that the limits are too high to ensure indigenous biodiversity is protected in line with the National Policy Statement for Indigenous Biodiversity and the Regional Policy Statement. For example, repeated clearance or disturbance events below the threshold could result in significant cumulative effects, including loss of habitat and ecological integrity over the plan's lifespan. Such cumulative effects could impact upon areas that contribute to ecological connectivity, buffering, and ecosystem resilience. The submitter notes that, from the section 32 report, ECO-R2 does not appear to be based on ecological advice.
149.47	Royal Forest and Bird Protection Society of New Zealand Incorporated	Ecosystems and Indigenous Biodiversity	Amend	<p>ADD rules to the Ecosystems and Indigenous Biodiversity chapter to avoid and manage adverse effects from new subdivision, use and development, including:</p>	<ul style="list-style-type: none"> • The submitter considers that new rules should be added to the Proposed District Plan as the National Policy Statement for Indigenous Biodiversity requires that adverse effects on indigenous biodiversity from new subdivision, use and development are avoided or managed

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				<ul style="list-style-type: none"> • A restricted discretionary rule for subdivision that is in or affects significant indigenous fauna or habitats, or indigenous biodiversity, with matters discretion restricted to: <ul style="list-style-type: none"> ○ Effects on vegetation clearance and associated land disturbance on indigenous biodiversity; ○ Extent of clearance proposed and any practicable alternative locations or methods to avoid or reduce the extent of indigenous vegetation clearance and associated land disturbance; ○ Proposed measures to avoid, remedy, mitigate, offset or compensate adverse effects on indigenous biodiversity values; ○ Reasons for the indigenous vegetation clearance and associated land disturbance; and ○ Any positive effects associated with the indigenous vegetation clearance and associated land disturbance. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	(Policies 7 and 8). As proposed, the Ecosystems and Indigenous Biodiversity chapter does not give effect to National Policy Statement for Indigenous Biodiversity direction.
149.48	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Character	Amend	<p>AMEND NATC-P2 by inserting an additional clause requiring any adverse effects to be avoided, remedied and mitigated.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> • Though the submitter is not opposed to enabling clearance and earthworks for such activities, it considers that effects must be avoided, remedied and mitigated akin to NTC-P3.3. It is requested that clause 3 of NATC-P3 is added to NATC-P2 to ensure effects are avoided, remedied and mitigated. •
149.49	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Character	Amend	<p>AMEND NATC-P2 by inserting '<u>indigenous biodiversity present - including indigenous vegetation, indigenous species habitat and indigenous species</u>' as matter to be had regard to.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> • The submitter opposes NATC-P2 in part and request it is amended as the natural character of the coastal environment, water bodies and their margins support indigenous biodiversity, indigenous vegetation and habitats should all be matters to have regard to when assessing effects.
149.50	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Character	Amend	<p>AMEND NATC-R2 condition a. by reducing building and structure area to 10m² to preserve natural character.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> • The submitter is concerned that a new building or structure of up to 300m² could be built within riparian margins as a permitted activity. It is considered that a building or structure of this size can have significant adverse effects on natural character.
149.51	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Character	Amend	<p>ADD matters of discretion to NATC-R1 that address natural character effects where performance standards are not met.</p> <p>AND</p> <p>ADD performance standards to NATC-R1 for restricted discretionary activities related to preserving natural character.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> • Where compliance is not achieved with the permitted rule, it is restricted discretionary and subject to performance standards. However, the matters of discretion are not included within the rules, nor are standards. This could be a drafting error which will need to be addressed.
149.52	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Character	Amend	<p>AMEND NATC-S1 maximum height standard to 2m.</p> <p>OR</p> <p>ADD a lower threshold that is more appropriate within the landscape context.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> • The submitter opposes NATC-S1 in part. A maximum height standard is supported; however, as proposed, the maximum height standard is likely to result in adverse effects on natural character. • A maximum height of 5.5m in conjunction with the permitted area being 300m² is likely to result in building and structure density along riparian margins capable of adversely affecting natural character. • A more precautionary approach within Natural Character standards is requested to preserve and protect natural character from inappropriate use.

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149.53	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Character	Amend	<p>AMEND NATC-S2 by:</p> <ul style="list-style-type: none"> Reducing maximum permitted cut depth from 2m to 0.5m or less. Requiring stabilisation of disturbed areas within one month of works. Including controls that require erosion and sediment control measures to be implemented and maintained during and after works. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes NATC-S2 in part. An earthworks standard is supported; however, as proposed, the standard is likely to result in adverse effects on natural character. In particular, enabling cut depth of up to 2m. It is noted that average bank heights within riparian margins can be less than 2m, and this cut depth could significantly alter natural character. Additionally, hydrological conditions and typically high water tables within riparian areas, earthworks of the scale proposed are likely to encounter ground or surface water. The risk of sediment-laden runoff into adjacent waterbodies is increased and risks adversely affecting natural character. The submitter also considers that the requirement to stabilise areas within six months is inappropriate for earthworks in riparian margins. This is due to six months including seasonal changes (potentially including winter flood events), therefore increasing the risk of exposed soils being mobilised and sediment entering waterbodies. The amendments requested are for the following reasons: <ul style="list-style-type: none"> A reduction in the maximum permitted cut depth to minimise changes to landforms and/or hydrological effects. Requiring stabilisation within one month in order to avoid sediment loss and associated effects on natural character. Implementation of erosion sediment and control measures to reduce earthworks effects. A more precautionary approach within Natural Character standards is requested to preserve and protect natural character from inappropriate use.
149.54	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Character	Amend	<p>AMEND NATC-S3 to manage indigenous and exotic vegetation clearance within riparian margins to maintain ground cover, reduce erosion risk, and protect water quality.</p> <p>AND</p> <p>ADD a 500m² cumulative threshold for vegetation clearance over time to NATC-S3 (e.g., measured over a 10-year period)</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes NATC-S3 in part. A vegetation clearance standard is supported; however, as proposed, the standard is likely to result in adverse effects on natural character. In particular, the lack of cumulative clearance management. Adding a cumulative threshold for vegetation clearance over time seeks to prevent ongoing incremental loss of riparian vegetation and natural character. By only managing indigenous vegetation clearance, water quality (and by extension natural character) is not protected. This is because the removal of exotic vegetation can still contribute to sediment entering water bodies. A more precautionary approach within Natural Character standards is requested to preserve and protect natural character from inappropriate use.
149.55	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Features and Landscapes	Amend	<p>AMEND the second paragraph of the Overview to the Natural Features and Landscapes chapter so it clearly states that natural features and landscapes are sensitive to inappropriate subdivision, use, and development. Also, so that appropriate proposals avoid adverse effects on identified values.</p> <p>AND</p> <p>AMEND the Overview to the Natural Features and Landscapes chapter to remove or reframe language that implies development may be acceptable in areas deemed 'less sensitive' to avoid creating a permissive interpretation that could undermine the protection of natural character and landscape values.</p> <p>AND</p> <p>AMEND the Overview to expressly acknowledge areas frequently contain indigenous vegetation and habitat for indigenous fauna, and these biodiversity</p>	<ul style="list-style-type: none"> The submitter is generally supportive of the Overview but considers the second paragraph should be reframed to better reflect how sensitivity of natural features and landscapes relates to vulnerability to inappropriate subdivision, use, and development. Appropriate proposals are those capable of maintaining or enhancing identified values. The submitter requests that language implying that development may be acceptable in areas deemed 'less sensitive' is either removed or amended in order to avoid creating a permissive interpretation capable of undermining the protection of natural character and landscape value and may enable the degradation of values over time. The Overview must include greater recognition of how these areas provide indigenous biodiversity, with indigenous vegetation and indigenous fauna present, and that this contributes to value.

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				values make up an area's 'outstanding' value. AND Any consequential amendments and alternative relief to address the concerns raised.	
149.56	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Features and Landscapes	Oppose	AMEND NFL-P2 as follows: Recognise that lawfully established land use and development are located within Outstanding Natural Features and Outstanding Natural Landscapes and allow them to continue without undue restriction <u>provided that additional adverse effects on the characteristics, qualities and values of Outstanding Natural Features and Outstanding Natural Landscapes as set out in SCHED4 and SCHED5 are avoided.</u> AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> The submitter considers that, without amendment, NFL-P2 could enable unrestricted existing use and development. This could result in the incremental intensification of existing activities and use over time, thus adversely affecting the values which make an area outstanding. It is requested that NFL-P2 is amended to restrict the scale and intensity of existing use and development from increasing.
149.57	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Features and Landscapes	Amend	DELETE NFL-P3 from the Natural Features and Landscapes chapter. AND ADD NFL-P3 to the Coastal Environment chapter. AND AMEND NFL-P3 to give effect to Policy 15 of the New Zealand Coastal Policy Statement. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> The submitter opposes NFL-P3 in part. All coastal environment-related provisions should be within the Coastal Environment chapter. This change is sought for plan certainty and effectiveness. Policy 15 of the New Zealand Coastal Policy Statement provides direction on adverse effects which are not included in NFL-P3. In order to give effect to the New Zealand Coastal Policy Statement, Policy 15 wording should be included within the Proposed District Plan.
149.58	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Features and Landscapes	Amend	AMEND NFL-P4 to include indigenous vegetation alteration and removal as considerations when avoiding, remedying and mitigating adverse effects on features and landscapes. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> The submitter opposes NFL-P4 in part as they consider that the policy does not cover indigenous vegetation alteration or clearance, despite indigenous vegetation contributing to the value, quality and characteristics of most outstanding natural features and landscapes. It is requested that NFL-P4 is amended to include direction on indigenous vegetation alteration and clearance.
149.59	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Features and Landscapes	Oppose	ADD a new clause to NFL-P5 which requires demonstration of there being no other feasible alternative locations available outside of the Outstanding Natural Feature or Outstanding Natural Landscape. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> The submitter is concerned that, as currently drafted, the policy can enable development of infrastructure within Outstanding Natural Features and Outstanding Natural Landscapes without sufficient consideration of whether it could be feasibly located elsewhere. By including an alternatives test, this would help to ensure the protection of Outstanding Natural Features and Outstanding Natural Landscapes and give it appropriate weight in decision-making. Moreover, this is consistent with higher-order policy direction.
149.60	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Features and Landscapes	Amend	AMEND the rules in the Natural Features and Landscapes chapter so that compliance with NFL-S4 and NFL-S5 is required for all permitted activities. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> The submitter opposes these rules in part. The submitter is concerned that NFL rules, as currently drafted, do not require permitted activities to meet indigenous vegetation clearance and earthworks standards. Rules should include a condition requiring compliance with NFL- S4 and NFL-S5, in order to ensure the protection of outstanding natural features and landscapes in accordance with section 6(b) Resource Management Act.
149.61	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Features and Landscapes	Amend	AMEND NFL-S2 to ensure all buildings and structures are covered by the rule framework and associated gross floor area standard. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> The submitter opposes NFL-S2 in part. The submitter notes that buildings other than accessory buildings and residential units may be proposed within an Outstanding Natural Feature or Landscape area, and the standard (and associated rules) do not cover other types of buildings.

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149.62	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Features and Landscapes	Oppose	<p>ADD to NFL-S4 a 500m³ lifetime of plan limit on earthworks per site for permitted or controlled activities.</p> <p>AND</p> <p>AMEND the depth in NFL-S4.2. to either 0.5m or a more conservative height to protect characteristics, values and qualities of identified Outstanding Natural Landscapes.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes NFL-S4 as they are concerned that there are no total limits to ensure cumulative adverse effects of earthworks are avoided (i.e., adverse effects cumulating over long time periods such as the District Plan lifetime). The submitter also opposes NFL-S4 enabling 2m cut and full, as this can result in adverse effects.
149.63	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Features and Landscapes	Oppose	<p>ADD to NFL-S5 a 500m² lifetime of plan limit for indigenous vegetation clearance per site.</p> <p>AND</p> <p>AMEND NFL-S5 to ensure the proposed limit is outside areas meeting Regional Policy Statement significance criteria (inferred).</p> <p>AND</p> <p>AMEND the area limit of clearance to 50m² to protect characteristics, values and qualities of Outstanding Natural Landscapes.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes NFL-S5 and requests that an overall limit is placed on vegetation clearance, spanning the lifetime of the District Plan. The submitter considers this is required to avoid the cumulative adverse effects of vegetation clearance. Moreover, the submitter is concerned that permitted 150m² of vegetation clearance per site will result in adverse effects and requests this limit is decreased to protect the characteristics, values and qualities of Outstanding Natural Features and Landscapes.
149.64	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Features and Landscapes	Oppose	<p>AMEND the percentage limit in NFL-S6 to either 10% or a more conservative limit consistent with protecting Outstanding Natural Features and Landscapes.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter is concerned about NFL-S6 enabling a 20% increase in building and structure floor areas. This is because, for larger existing buildings and structures, 20% would be a large increase. A more conservative limit is sought to protect Outstanding Natural Features and Landscapes.
149.65	Royal Forest and Bird Protection Society of New Zealand Incorporated	Public Access	Amend	<p>ADD text to the Overview to the Public Access chapter which relates to restricting public access in the Coastal Environment where required, in accordance with Policies 19 and 20 of the New Zealand Coastal Policy Statement.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> Policies 19 and 20 of the New Zealand Coastal Policy Statement recognise that public access may need to be restricted in some cases. The submitter considers that the Overview should include this recognition.
149.66	Royal Forest and Bird Protection Society of New Zealand Incorporated	Public Access	Amend	<p>AMEND PA-O2 as follows:</p> <p>Public access does not adversely affect the values of sensitive environments, such as the coastal environment, High Natural Character Areas, Outstanding Natural Character Areas, Outstanding Natural Landscapes, Outstanding Natural Features and Sites and Areas of Significance to Māori. <u>Where it does, public access is restricted.</u></p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter supports the intent of PA-O2 but requires clarification that, in some cases, access must be restricted in order to avoid adverse effects on sensitive environments. Clarity is sought to improve the Proposed District Plan's effectiveness.
149.67	Royal Forest and Bird Protection Society of New Zealand Incorporated	Public Access	Amend	<p>ADD a new policy to the Public Access chapter to establish where and under what circumstances public access will be restricted to:</p> <ul style="list-style-type: none"> Protect indigenous biodiversity values; Protect threatened indigenous species; Protect sensitive natural areas or habitats; and Avoid harm to ecological systems or to indigenous flora and fauna. <p>AND</p>	<ul style="list-style-type: none"> The submitter seeks a new Public Access policy for those circumstances where public access should be restricted to protect indigenous threatened species or sensitive natural areas.

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				Any consequential amendments and alternative relief to address the concerns raised.	
149.68	Royal Forest and Bird Protection Society of New Zealand Incorporated	Subdivision	Amend	<p>AMEND the Overview in the Subdivision chapter by adding the following:</p> <p><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></p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter considers 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 to whether it is acceptable within sensitive environments.
149.69	Royal Forest and Bird Protection Society of New Zealand Incorporated	Subdivision	Amend	<p>AMEND SUB-O1 as follows:</p> <p>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></p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> 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.
149.70	Royal Forest and Bird Protection Society of New Zealand Incorporated	Subdivision	Amend	<p>ADD a new clause to SUB-O3 as follows:</p> <p><u>Protects significant indigenous biodiversity from fragmentation and manages adverse effects in accordance with Ecosystems and Indigenous Biodiversity chapter provisions.</u></p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> 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. 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.
149.71	Royal Forest and Bird Protection Society of New Zealand Incorporated	Subdivision	Amend	<p>AMEND SUB-P1.1. by inserting 'waterbodies' and 'habitat of indigenous species'</p> <p>AND</p> <p>ADD a new clause to SUB-P1 requiring subdivision design and location to maintain the health and wellbeing of water bodies and freshwater ecosystems.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes 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.
149.72	Royal Forest and Bird Protection Society of New Zealand Incorporated	Subdivision	Amend	<p>AMEND SUB-P2 to reference Infrastructure objectives, policies and rules.</p> <p>AND</p> <p>AMEND SUB-P2 to include outcomes for stormwater quality and quantity management that:</p> <ul style="list-style-type: none"> Maintain or improve freshwater health and the mauri of water bodies and receiving environments; Avoid or minimise adverse effects of stormwater discharges on the coastal environment; Incorporate provisions to achieve or contribute to the achievement of Te Mana o te Wai; Minimise changes to natural flow regimes and hydrological connectivity; and Support the life-supporting capacity, ecosystem health, and natural character of freshwater and coastal receiving environments. 	<ul style="list-style-type: none"> 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. 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.

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				AND Any consequential amendments and alternative relief to address the concerns raised.	
149.73	Royal Forest and Bird Protection Society of New Zealand Incorporated	Subdivision	Amend	AMEND SUB-P3.1 as follows: Provide for recreation, <u>open spaces</u> and public access by: 1. Encouraging Requiring the provision of public open <u>and natural spaces</u> , 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"> 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.
149.74	Royal Forest and Bird Protection Society of New Zealand Incorporated	Subdivision	Amend	ADD 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"> The Rural zone contains remnants of indigenous biodiversity. As such, SUB-P8 should provide direction on its protection, maintenance and enhancement through subdivision.
149.75	Royal Forest and Bird Protection Society of New Zealand Incorporated	Subdivision	Amend	ADD 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. AND ADD provisions that promote increasing indigenous vegetation cover in urban and non-urban environments. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> 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. 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. 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.
149.76	Royal Forest and Bird Protection Society of New Zealand Incorporated	Subdivision	Oppose	ADD rules and standards to ensure subdivision is appropriately managed in areas that require preservation and protection under s6 Resource Management Act. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> 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.
149.77	Royal Forest and Bird Protection Society of New Zealand Incorporated	Coastal Environment	Amend	AMEND the first line of the Overview to the Coastal Environment chapter as follows This chapter aims to preserve and restore the natural character of the coastal environment and protect it from inappropriate subdivision, use and development. The purpose of this chapter is to preserve and restore the natural character of the coastal environment and protect it from inappropriate subdivision, use and development. AND ADD to text into the Overview stating the scope of the section is not just covering natural character, but other matters as set out in the New Zealand Coastal Policy Statement and explaining where in the District Plan biodiversity matters within the Coastal Environment are addressed.	<ul style="list-style-type: none"> Amendment to the start of the Coastal Environment Overview is required to clarify the purpose of the chapter being to preserve and restore natural character rather than aiming to. Section 6(a) Resource Management Act and the New Zealand Coastal Policy Statement requires preservation to be both recognised and provided for and the Proposed District Plan should give effect to this direction. The submitter notes that, as drafted, the text gives the impression of scope only extending to natural character; however, the New Zealand Coastal Policy Statement provides direction on other matters including: <ul style="list-style-type: none"> Safeguarding the integrity, form, functioning and resilience of the coastal environment; Maintaining and enhancing public open space and recreation opportunities;

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				AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> ○ Coastal hazards and risk; and ○ Enabling people and communities to provide for their wellbeing and health and safety. ● It is requested that these matters are integrated into the Coastal Environment Overview.
149.78	Royal Forest and Bird Protection Society of New Zealand Incorporated	Coastal Environment	Amend	AMEND CE-O1 by adding elements that contribute to natural character, as identified in Policy 13(2) of the New Zealand Coastal Policy Statement. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> ● Policy 13(2) of the New Zealand Coastal Policy Statement sets out elements of natural character within the coastal environment. The submitter requests that CE-O1 is amended to include these elements for certainty and effectiveness for plan users and decision-makers to manage adverse effects on natural character.
149.79	Royal Forest and Bird Protection Society of New Zealand Incorporated	Coastal Environment	Amend	AMEND CE-O3 so the text does not include the objective title. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> ● The submitter supports CE-O3 but raises what appears to be a drafting error which should be corrected.
149.80	Royal Forest and Bird Protection Society of New Zealand Incorporated	Coastal Environment	Amend	ADD new objectives and policies that give effect to the Coastal Environment chapter following New Zealand Coastal Policy Statement policies: <ul style="list-style-type: none"> ● Policy 1 - Extent and characteristics of the coastal environment ● Policy 2 - The Treaty of Waitangi, tangata whenua and Māori heritage ● Policy 3 - Precautionary approach ● Policy 4 - Integration ● Policy 6 - Activities in the coastal environment ● Policy 7 - Strategic planning ● Policy 10 - Reclamation and de-reclamation ● Policy 11 - Indigenous biological diversity (unless referred to in this section as being included fully in the Ecosystems and Indigenous Biodiversity chapter) ● Policy 12 - Harmful aquatic organisms ● Policy 17 - Historic heritage identification and protection ● Policy 18 - Public open space ● Policy 19 - Walking access ● Policy 20 - Vehicle access ● Policy 21 - Enhancement of water quality ● Policy 22(2) - (4) - Sedimentation ● Policy 23(4) ● Policy 24 - Identification of coastal hazards ● Policy 25 - Subdivision, use and development in areas of coastal hazard risk ● Policy 26 - Natural defences against coastal hazards ● Policy 27 - Strategies for protecting significant existing development from coastal hazard risk AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> ● Additional Coastal Environment objectives and policies are required to give effect to the New Zealand Coastal Policy Statement.
149.81	Royal Forest and Bird Protection Society of New Zealand Incorporated	Coastal Environment	Amend	AMEND CE-P1 by changing 'land use and development' to 'activities' throughout. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> ● The submitter supports a policy regarding the management of adverse effects on natural character, Policy 13 of the New Zealand Coastal Policy Statement requires adverse effects of 'activities' to be managed, not only of 'land use and development'. Land use and development does not include subdivision and CE-P1 should be amended to cover 'activities' in order to give effect to the New Zealand Coastal Policy Statement.

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149.82	Royal Forest and Bird Protection Society of New Zealand Incorporated	Coastal Environment	Amend	AMEND CE-R2 by providing standards for regionally significant infrastructure limiting gross floor area to 10m ² and height to 2m (inferred). AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> The submitter considers that providing for new buildings and structures for regionally significant infrastructure without standards could result in adverse effects on natural character and indigenous biological diversity within the Coastal Environment. Standards are required under CE-R2 to ensure effects are appropriately managed.
149.83	Royal Forest and Bird Protection Society of New Zealand Incorporated	Coastal Environment	Amend	AMEND CE-R3 by providing standards for regionally significant infrastructure that limit vegetation clearance area to 500m ² over the lifetime of the plan. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> The submitter considers that providing for vegetation clearance for regionally significant infrastructure without standards could result in adverse effects on natural character and indigenous biological diversity within the Coastal Environment. Standards are required under CE-R3 to ensure effects are appropriately managed.
149.84	Royal Forest and Bird Protection Society of New Zealand Incorporated	Coastal Environment	Amend	AMEND CE-R4 by providing standards for regionally significant infrastructure that limit earthworks to 500m ³ over the lifetime of the plan. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> The submitter considers that providing for earthworks for regionally significant infrastructure without standards could result in adverse effects on natural character and indigenous biological diversity within the Coastal Environment. Standards are required under CE-R4 to ensure effects are appropriately managed.
149.85	Royal Forest and Bird Protection Society of New Zealand Incorporated	Coastal Environment	Amend	AMEND CE-S4 by shortening the timeframe for reinstatement to as soon as practicable and within 1-month or a more conservative timeframe. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> The submitter is concerned about the 12-month timeframe between the completion of earthworks and site reinstatement. Over 12-months, there is potential for disturbed land to enter coastal waters or become unstable as it is exposed to the coastal environment, resulting in adverse effects on the coastal environment. By shortening the reinstatement timeframe to as soon as practicable and within 1-month (or something more conservative), exposed areas will not become unstable or enter coastal waters.
149.86	Royal Forest and Bird Protection Society of New Zealand Incorporated	Coastal Environment	Amend	ADD a new standard to the Coastal Environment rules requiring dust, silt and sediment controls similar to EW-S4 for earthworks activities within the Coastal Environment. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> A dust, silt, sediment control standard (like EW-S4) is required for earthworks in the Coastal Environment to appropriately manage the effects of earthworks.
149.87	Royal Forest and Bird Protection Society of New Zealand Incorporated	Earthworks	Amend	AMEND the Overview in the Earthworks chapter to include recognition that earthworks can result in adverse effects on indigenous biodiversity. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> The potential adverse effects of earthworks on indigenous biodiversity should be recognised within the Overview.
149.88	Royal Forest and Bird Protection Society of New Zealand Incorporated	Earthworks	Amend	AMEND EW-P1 by adding an additional clause as follows: <u>Appropriate management of any adverse effects on the environment.</u> AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> EW-P1 should include a clause stating appropriate management of effects on the environment.
149.89	Royal Forest and Bird Protection Society of New Zealand Incorporated	Earthworks	Amend	AMEND EW-P2 by adding the following clause: <u>Earthworks are undertaken with an Erosion and Sediment Control Plan in place.</u> AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> EW-P2 should set out that best practice erosion and sediment control methods must be used to ensure earthworks are appropriately managed. This is to ensure that earthworks do not result in adverse environmental effects.

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149.90	Royal Forest and Bird Protection Society of New Zealand Incorporated	Earthworks	Amend	<p>AMEND EW-P3.1. as follows:</p> <p>1. Adverse environmental effects generated by the quarrying activity or mining activity are internalised as far as practicable using industry best practice and management plans; Any adverse effects generated by the quarrying activity or mining activity are avoided, remedied or mitigated</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> As currently drafted, EW-P3.1. accepts that adverse effects will occur. This is inconsistent with Section 5 Resource Management Act which requires effects to be avoided, remedied or mitigated. The wording “internalised as far as practicable” is vague and provides too much discretion to operators, risking inconsistent implementation. Such inconsistencies could lead to cumulative effects and undermine the protective intent of environmental objectives and policies. The submitter considers that internalised effects are still effects and, therefore, should be appropriately managed. To rely on industry best practice and management plans as mitigation assumes levels of environmental performance not always achievable. Best practice can still result in significant adverse effects (especially near sensitive areas) and a precautionary approach is warranted.
149.91	Royal Forest and Bird Protection Society of New Zealand Incorporated	Earthworks	Amend	<p>ADD additional clauses to EW-P4 outlining what rehabilitation plans must cover and the outcomes sought, including:</p> <ul style="list-style-type: none"> Re-establishment of indigenous vegetation and ecosystems, and hydrological and landforms that reflect the natural character and biodiversity values of the area prior to disturbance. Provide for ongoing ecological monitoring. Include clear, measurable targets and timeframes. Require the use of locally sourced indigenous plant species wherever possible. Incorporate consultation requirements and opportunities for community and tangata whenua involvement. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> EW-P4 is supported in part but the submitter requests additional clauses are added so that the policy sets out the outcomes sought for rehabilitation.
149.92	Royal Forest and Bird Protection Society of New Zealand Incorporated	Earthworks	Oppose	<p>AMEND Earthworks rules (including EW-R1 and EW-R2) so they do not apply to overlays and zones where protection is required (e.g., the Coastal Environment or Outstanding Natural Features and Landscapes).</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> As drafted, Earthworks rules apply in all zones; however, this is not the case for Outstanding Natural Features, Landscapes or the Coastal Environment and other sensitive areas where protection is required. The submitter requests that Earthworks rules reflect this by excluding the areas.
149.93	Royal Forest and Bird Protection Society of New Zealand Incorporated	Earthworks	Oppose	<p>DELETE EW-R2.</p> <p>OR</p> <p>AMEND EW-R2 to apply permitted performance standards for earthworks to land disturbance activities.</p> <p>OR</p> <p>AMEND EW-R2 to have a restricted discretionary activity status for when compliance is not achieved.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes EW-R2 as notified and is concerned with 'land disturbance' being permitted without performance standards. It is not clear how effects from land disturbance and earthworks differ or why a different control approach is required. The submitter notes that whether temporary or permanent land disturbance causing a change in profile, exposed soil could still enter waterways or disturb indigenous habitats if not managed appropriately.
149.94	Royal Forest and Bird Protection Society of New Zealand Incorporated	Earthworks	Oppose	<p>ADD standards relating to silt, sediment and dust control to EW-R3.</p> <p>AND</p> <p>ADD setback standards for farm quarrying from areas of indigenous vegetation to EW-R3.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The General rural and Māori purpose zones feature remnant areas of indigenous vegetation and are likely habitat for indigenous species, including specified highly mobile fauna. By enabling quarrying of volumes of up to 1,000m3 without any dust, silt or sediment controls, or setbacks, this could adversely affect indigenous biodiversity.

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149.95	Royal Forest and Bird Protection Society of New Zealand Incorporated	Earthworks	Amend	<p>AMEND EW-R4 to require a rehabilitation plan to include detailed requirements for outcomes, including:</p> <ul style="list-style-type: none"> Re-establishment of indigenous vegetation and ecosystems, and hydrological and landforms that reflect the natural character and biodiversity values of the area prior to disturbance. Use of locally sourced indigenous plant species wherever possible. Ongoing ecological monitoring. Identification of clear, measurable targets and timeframes for re-establishment. Consultation requirements for preparing the plan, particularly with tangata whenua, and identification of opportunities for community and tangata whenua involvement in rehabilitation. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> As per the submitter's submission on the rehabilitation plan policy, particular requirements for plans must be set out so it is clear what outcomes are sought and what contents are required.
149.100	Royal Forest and Bird Protection Society of New Zealand Incorporated	Noise	Amend	<p>ADD the following text to the Noise Overview:</p> <p><u>Noise can adversely affect indigenous biodiversity by disturbing natural behaviours. For example, elevated noise levels may cause birds to abandon nests.</u></p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> As drafted, Noise provisions do not reflect the adverse effect noise can have on natural environment values and on indigenous fauna in particular. E.g., frost fans, helicopter landings and bird scaring devices can affect indigenous birds.
149.101	Royal Forest and Bird Protection Society of New Zealand Incorporated	Noise	Amend	<p>ADD a new Noise Objective as follows:</p> <p><u>Noise is managed to protect indigenous biodiversity.</u></p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> As drafted, Noise provisions do not reflect the adverse effect noise can have on natural environment values and on indigenous fauna in particular. E.g., frost fans, helicopter landings and bird scaring devices can affect indigenous birds.
149.102	Royal Forest and Bird Protection Society of New Zealand Incorporated	Noise	Amend	<p>ADD a new Noise policy as follows:</p> <p><u>NOISE-PX: Manage adverse effects of noise on indigenous biodiversity in accordance with ECO section provisions.</u></p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> As drafted, Noise provisions do not reflect the adverse effect noise can have on natural environment values and on indigenous fauna in particular. E.g. frost fans, helicopter landings and bird scaring devices can affect indigenous birds.
149.103	Royal Forest and Bird Protection Society of New Zealand Incorporated	Noise	Amend	<p>ADD the following matters of discretion to NOISE-MAT1:</p> <ul style="list-style-type: none"> The effect of the noise on indigenous biodiversity values; The extent of noise and any practicable locations or methods to avoid or reduce the extent of effects on indigenous biodiversity values; and The proposed measures to avoid, remedy, mitigate, offset or compensate adverse effects on indigenous biodiversity values. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> As drafted, Noise provisions do not reflect the adverse effect noise can have on natural environment values and on indigenous fauna in particular. E.g. frost fans, helicopter landings and bird scaring devices can affect indigenous birds.
149.104	Royal Forest and Bird Protection Society of New Zealand Incorporated	Temporary Activities	Amend	<p>AMEND the Overview in the Temporary Activities chapter to include recognition that temporary activities have the potential to adversely affect natural environment values including indigenous biodiversity.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> As drafted, Temporary Activity provisions do not reflect the adverse effects temporary activities can have on natural environment values and on indigenous biodiversity. E.g. temporary military training activities in areas with indigenous vegetation and habitats could result in trampling and destruction.

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149.105	Royal Forest and Bird Protection Society of New Zealand Incorporated	Temporary Activities	Amend	AMEND TEMP-O2.1. to include natural environment values. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> As drafted, Temporary Activity provisions do not reflect the adverse effects temporary activities can have on natural environment values and on indigenous biodiversity. E.g. temporary military training activities in areas with indigenous vegetation and habitats could result in trampling and destruction.
149.106	Royal Forest and Bird Protection Society of New Zealand Incorporated	Temporary Activities	Amend	DELETE the enabling standard for ancillary buildings and structures from TEMP-R2. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> As drafted, Temporary Activity provisions do not reflect the adverse effects temporary activities can have on natural environment values and on indigenous biodiversity. E.g., temporary military training activities in areas with indigenous vegetation and habitats could result in trampling and destruction.
149.107	Royal Forest and Bird Protection Society of New Zealand Incorporated	Temporary Activities	Amend	AMEND Temporary Activity rules by adding effects on natural values, the environment and indigenous biodiversity as matters of discretion. AND AMEND Temporary Activity rules so temporary activities are not enabled on sites and within overlays containing indigenous biodiversity. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> As drafted, Temporary Activity provisions do not reflect the adverse effects temporary activities can have on natural environment values and on indigenous biodiversity. E.g. temporary military training activities in areas with indigenous vegetation and habitats could result in trampling and destruction.
149.108	Royal Forest and Bird Protection Society of New Zealand Incorporated	Temporary Activities	Amend	ADD standards for temporary activities in natural environments which protect them from adverse effects to the Temporary Activities chapter. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> As drafted, Temporary Activity provisions do not reflect the adverse effects temporary activities can have on natural environment values and on indigenous biodiversity. E.g. temporary military training activities in areas with indigenous vegetation ...
149.109	Royal Forest and Bird Protection Society of New Zealand Incorporated	General Rural Zone	Amend	ADD the following text to the Overview of the General rural zone chapter: <u>The General rural zone also contains important natural environment values, including areas of natural character and indigenous biodiversity. These values are expressed through natural features and indigenous vegetation that often provide habitat for indigenous fauna. The Council has responsibilities under the Resource Management Act 1991, National Policy Statement for Indigenous Biodiversity and Northland Regional Policy Statement, to preserve natural character and to protect, maintain, and where appropriate, restore indigenous biodiversity. Much of Kaipara's indigenous biodiversity and natural character has been lost or degraded. In response, the management approach for the General rural zone places emphasis on the protection and enhancement of remaining natural areas and ensures that land use and development are undertaken in a manner that supports these outcomes.</u> AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> The submitter recognises that the primary purpose of the General rural zone is to provide for rural production activities, there are areas of indigenous vegetation and indigenous fauna habitats throughout the rural zone. Natural character is also present including rivers, streams and wetlands. The General rural zone Overview must recognise these attributes and set out the management approach as well as relevant higher-order documents. The National Policy Statement for Indigenous Biodiversity requires Council to recognise the importance of and provide for maintenance of indigenous biodiversity outside of Significant Natural Areas.
149.110	Royal Forest and Bird Protection Society of New Zealand Incorporated	General Rural Zone	Amend	AMEND the General rural zone rule notes by including cross references to Natural Character and Ecosystems and Indigenous Biodiversity chapters. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> The submitter recognises that the primary purpose of the General rural zone is to provide for rural production activities, there are areas of indigenous vegetation and indigenous fauna habitats throughout the rural zone. Natural character is also present including rivers, streams and wetlands. The General rural zone must recognise these attributes and set out the management approach as well as relevant higher-order documents. The National Policy Statement for Indigenous Biodiversity requires Council to recognise the importance of and provide for maintenance of indigenous biodiversity outside of Significant Natural Areas.

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149.111	Royal Forest and Bird Protection Society of New Zealand Incorporated	General Rural Zone	Amend	<p>ADD new General rural zone objectives as follows:</p> <p><u>GRUZ-OX Indigenous biodiversity in the General rural zone is maintained</u></p> <p><u>GRUZ-OX Indigenous biodiversity in the General rural zone is restored.</u></p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter seeks that new General rural zone objectives are added which relate to maintaining, promoting and providing restoration of indigenous biodiversity within the zone. This is required in order to give effect to the National Policy Statement for Indigenous Biodiversity Policies 8 and 13 (clauses 3.16, 3.21).
149.112	Royal Forest and Bird Protection Society of New Zealand Incorporated	General Rural Zone	Amend	<p>ADD new General rural zone policies as follows:</p> <p><u>To maintain indigenous biodiversity in the General rural zone, manage any adverse effects of new use and development in accordance with Ecosystems and Indigenous Biodiversity provisions.</u></p> <p>AND</p> <p><u>To restore indigenous biodiversity in the General rural zone, promote and provide for restoration with priority given to:</u></p> <ul style="list-style-type: none"> <u>Threatened and rare ecosystems representative of naturally occurring and formerly present ecosystems.</u> <u>Areas that provide important connectivity or buffering functions.</u> <u>Natural inland wetlands whose ecological integrity is degraded or that no longer retain their indigenous vegetation or habitat for indigenous fauna.</u> <u>Areas of indigenous biodiversity on specified Māori land where restoration is advanced by the Māori landowners.</u> <p><u>When new use or development is proposed on a site with an important ecosystem or significant indigenous biodiversity area, consider requiring conditions for restoration or enhancement of that area on resource consents.</u></p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter seeks that new General rural zone policies are added which relate to maintaining, promoting and providing restoration of indigenous biodiversity within the zone. This is required in order to give effect to the National Policy Statement for Indigenous Biodiversity Policies 8 and 13 (clauses 3.16, 3.21).
149.113	Royal Forest and Bird Protection Society of New Zealand Incorporated	General Rural Zone	Oppose	<p>AMEND GRUZ-P2 as follows:</p> <p>Enable Recognise primary production activities generate adverse effects associated with a typical rural working environment, such as odour, noise, dust, and involve heavy traffic movements, fertiliser application, crop spraying and forestry harvesting, occur, and should be accepted, in the General rural zone.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> Though the submitter accepts the effects described as being common within the General rural zone, GRUZ-R2 is drafted so it requires acceptance of such effects rather than appropriate management in accordance with Sections 5 and 6 Resource Management Act. As notified, the policy directs decision-makers to accept adverse effects without management, which the submitter considers is inappropriate. The policy should be amended so it sets out common effects and activities associated with primary production.
149.114	Royal Forest and Bird Protection Society of New Zealand Incorporated	General Rural Zone	Amend	<p>ADD a new General rural zone policy as follows:</p> <p><u>Enable primary production activities, where adverse effects are avoided, remedied or mitigated.</u></p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter considers an additional General rural zone policy (subsequent to the amendments requested for GRUZ-R2) is required to enable primary production activities whilst requiring adverse effects to be managed. As requested, the new policy deals with how adverse effects of primary production activities are to be managed.
149.115	Royal Forest and Bird Protection Society of New Zealand Incorporated	General Rural Zone	Amend	<p>ADD to GRUZ-P5 as follows:</p> <p><u>Involve maintenance or restoration of indigenous biodiversity.</u></p> <p>AND</p> <p>AMEND GRUZ-P5 to ensure clause 3 does not apply to the additional clause sought above.</p>	<ul style="list-style-type: none"> The submitter recognises that productive land requires protection in accordance with the National Policy Statement on Highly Productive Land. However, as parts of the General rural zone contain indigenous biodiversity, GRUZ-P5 needs to be explicit in providing for maintenance and restoration activities, as well as being clear that restoration and enhancement are non-rural activities that do not need to be avoided.

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				AND Any consequential amendments and alternative relief to address the concerns raised.	
149.116	Royal Forest and Bird Protection Society of New Zealand Incorporated	General Rural Zone	Amend	ADD a new General rural zone rule regarding indigenous vegetation clearance and associated land disturbance with a standard allowing only up to 50m ² of area to be disturbed. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> New rules are required to cover vegetation clearance and associated land disturbance within rural areas containing indigenous vegetation.
149.117	Royal Forest and Bird Protection Society of New Zealand Incorporated	General Rural Zone	Amend	ADD a restricted discretionary General rural zone rule for indigenous vegetation clearance and associated land disturbance that does not meet the permitted area standard, with the following matters of discretion: <ul style="list-style-type: none"> Effects on of vegetation clearance and associated land disturbance on indigenous biodiversity; Extent of clearance proposed and any practicable alternative locations or methods to avoid or reduce the extent of indigenous vegetation clearance and associated land disturbance; Proposed measures to avoid, remedy, mitigate, offset or compensate adverse effects on indigenous biodiversity values; Reasons for the indigenous vegetation clearance and associated land disturbance; and Positive effects associated with the indigenous vegetation clearance and associated land disturbance AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> New rules are required to cover vegetation clearance and associated land disturbance within rural areas containing indigenous vegetation.
149.118	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Open Space Zone	Amend	ADD a new permitted activity rule for indigenous vegetation clearance and associated land disturbance with a standard allowing only up to 50m ² of area to be disturbed. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> As indigenous vegetation and natural features provide habitats for indigenous fauna within the Natural open space zone, the submitter considers that earthworks and vegetation clearance can have adverse effects on indigenous biodiversity, natural features and character. As such, earthworks and vegetation clearance rules and standards need to be included in this section.
149.119	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Open Space Zone	Amend	ADD a restricted discretionary rule to the Natural open space zone for indigenous vegetation clearance and associated land disturbance that does not meet the area standard, with the following matters of discretion: <ul style="list-style-type: none"> Effects on of vegetation clearance and associated land disturbance on indigenous biodiversity; Extent of clearance proposed and any practicable alternative locations or methods to avoid or reduce the extent of indigenous vegetation clearance and associated land disturbance; Proposed measures to avoid, remedy, mitigate, offset or compensate adverse effects on indigenous biodiversity values; Reasons for the indigenous vegetation clearance and associated land disturbance; and Positive effects associated with the indigenous vegetation clearance and associated land disturbance. AND	<ul style="list-style-type: none"> As indigenous vegetation and natural features provide habitats for indigenous fauna within the Natural open space zone, the submitter considers that earthworks and vegetation clearance can have adverse effects on indigenous biodiversity, natural features and character. As such, earthworks and vegetation clearance rules and standards need to be included in this section.

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149.120	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Open Space Zone	Amend	<p>AMEND new standards to NOSZ-R2 that require:</p> <ul style="list-style-type: none"> The Council to be notified prior to activities occurring; and The activities to be in accordance with the Natural open space zone standards. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> In order to ensure activities do not result in adverse effects and to monitor and manage effects appropriately, additional standards must be inserted as requested.
149.121	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Open Space Zone	Amend	<p>ADD standards to NOSZ-R3 for conservation and recreation activities that protect indigenous biodiversity to:</p> <ul style="list-style-type: none"> Limit any buildings and structures to 10m²; and Require compliance with earthworks and vegetation clearance limits. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> Though the submitter recognises conservation and recreation activities are likely to occur in the zone and notes that such activities can have adverse effects on indigenous biodiversity and other natural environment values. As such, conservation activities should be subject to controls.
149.122	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Open Space Zone	Amend	<p>ADD standards to NOSZ-R4 for conservation and recreation activities that protect indigenous biodiversity to:</p> <ul style="list-style-type: none"> Limit any buildings and structures to 10m²; and Require compliance with earthworks and vegetation clearance limits. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> Though the submitter recognises conservation and recreation activities are likely to occur in the zone and notes that such activities can have adverse effects on indigenous biodiversity and other natural environment values. As such, conservation activities should be subject to controls.
149.123	Royal Forest and Bird Protection Society of New Zealand Incorporated	Open Space Zone	Amend	<p>AMEND OSZ-P1.3. as follows:</p> <p>3. Manage effects on the <u>natural, ecological, cultural and heritage values in the zone, and effects on the character and amenity of any adjacent General residential zone and the surrounding area.</u></p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The Open space zone Overview and OSZ-O1 establish the zone as including natural, ecological, cultural and heritage values. The submitter therefore considers that OSZ-P1 should seek to manage the effects on these values.
149.124	Royal Forest and Bird Protection Society of New Zealand Incorporated	Open Space Zone	Amend	<p>AMEND OSZ-P5 as follows:</p> <p><u>Avoid Minimise</u> land uses and activities that would compromise public use and enjoyment, <u>access to and the natural, ecological, cultural and heritage values associated with and access to</u> the Open space zone.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter considers that, given the purpose, characteristics and values of the Open space zone, incompatible activities should be avoided rather than minimised. The activities capable of compromising Open space zone values (as set out in OSZ-O1) should also be avoided.
149.125	Royal Forest and Bird Protection Society of New Zealand Incorporated	Open Space Zone	Amend	<p>ADD a new permitted activity Open space zone rule regarding vegetation clearance and associated land disturbance, with a standard allowing up to 50m² of disturbance.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> Given the presence of indigenous vegetation and ecological values in the Open space zone, there should be rules and standards to manage vegetation clearance, earthworks and potential effects on these values.
149.126	Royal Forest and Bird Protection Society of New Zealand Incorporated	Open Space Zone	Amend	<p>ADD a restricted discretionary Open space zone rule for indigenous vegetation clearance and associated land disturbance that does not meet the area standard, with the following matters of discretion:</p>	<ul style="list-style-type: none"> Given the presence of indigenous vegetation and ecological values in the Open space zone, there should be rules and standards to manage vegetation clearance, earthworks and potential effects on these values.

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				<ul style="list-style-type: none"> Effects on of vegetation clearance and associated land disturbance on indigenous biodiversity; Extent of clearance proposed and any practicable alternative locations or methods to avoid or reduce the extent of indigenous vegetation clearance and associated land disturbance; Proposed measures to avoid, remedy, mitigate, offset or compensate adverse effects on indigenous biodiversity values; Reasons for the indigenous vegetation clearance and associated land disturbance; and Positive effects associated with the indigenous vegetation clearance and associated land disturbance. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	
149.127	Royal Forest and Bird Protection Society of New Zealand Incorporated	General	Amend	<p>AMEND the Proposed District Plan to give effect to the National Policy Statement for Indigenous Biodiversity. Where provisions relate to Significant Natural Area identification, the submitter requests that they be implemented in the context of s6 Resource Management Act obligations and the relevant provisions of the Northland Regional Policy Statement.</p>	<ul style="list-style-type: none"> The submitter is concerned that the Proposed District Plan does not give effect to the National Policy Statement for Indigenous Biodiversity and is, therefore, inconsistent with Council's statutory functions under the Resource Management Act. The Proposed District Plan should be amended to give effect to National Policy Statement for Indigenous Biodiversity objectives, policies, and implementation clauses. Where provisions relate to Significant Natural Area identification, the submitter requests that they are implemented within the context of Council's obligations under s6 Resource Management Act and the relevant provisions of the Northland Regional Policy Statement. Specific submission points outline the relief sought by the submitter to give effect to the National Policy Statement for Indigenous Biodiversity.
149.128	Royal Forest and Bird Protection Society of New Zealand Incorporated	General	Amend	<p>AMEND the Proposed District Plan to provide stronger management tools for biodiversity including:</p> <ul style="list-style-type: none"> Improved effects management; Promoting restoration of indigenous biodiversity; Setting conservative vegetation removal limits; Applying the Regional Policy Statement significance criteria to identify areas for protection; Reference to the Wildlands report as guidance for the protection of areas with significant indigenous vegetation and habitats of indigenous fauna; and Ensuring that adverse effects on indigenous biodiversity are managed in accordance with the provisions of the Ecosystems and Indigenous Biodiversity chapter. <p>If biodiversity offsetting or compensation are to be considered, then the principles and criteria for these measures need to be included. This needs to include limit to offsetting and compensation in accordance with best practice and the National Policy Statement for Indigenous Biodiversity.</p>	<ul style="list-style-type: none"> Though the Proposed District Plan contains some biodiversity-related provisions, the submitter considers that stronger management tools are needed. It is requested that the Proposed District Plan is amended to provide the following relief: Improved effects management; Promoting restoration of indigenous biodiversity; Setting conservative vegetation removal limits; Applying the Regional Policy Statement significance criteria to identify areas for protection; Reference to the Wildland report as guidance for the protection of areas with significant indigenous vegetation and habitats of indigenous fauna; and Ensuring that adverse effects on indigenous biodiversity are managed in accordance with the provisions of the Ecosystems and Indigenous Biodiversity chapter. The submitter requests that, if biodiversity offsetting or compensation are being considered, the principles and criteria for such measures need to be included within the Proposed District Plan. Including limits to offsetting and compensation in accordance with best practice and the National Policy Statement for Indigenous Biodiversity.
149.129	Royal Forest and Bird Protection Society of New Zealand Incorporated	General	Amend	<p>AMEND the Proposed District Plan to give effect to the full suite of objectives and policy direction in the New Zealand Coastal Policy Statement.</p>	<ul style="list-style-type: none"> The New Zealand Coastal Policy Statement contains objectives and policies in addition to those on preserving natural character, but the Proposed District Plan does not give effect to these. E.g. New Zealand Coastal Policy Statement policy on protecting indigenous biological diversity and managing the adverse effects of activities on biodiversity. The New Zealand Coastal Policy Statement also provides direction on allowing natural

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					adjustments of ecosystems, habitats and species to occur alongside the effects of climate change. Moreover, sedimentation and stormwater discharges also require managements in alignment with the New Zealand Coastal Policy Statement.
149.130	Royal Forest and Bird Protection Society of New Zealand Incorporated	General	Amend	AMEND the Proposed District Plan to give effect to the National Policy Statement for Freshwater Management.	<ul style="list-style-type: none"> The National Policy Statement for Freshwater Management provides direction on maintaining and improving the health and well-being of water bodies and freshwater ecosystems, as well as direction on managing land use and development in an integrated way considering effects on a whole-of-catchment basis. In particular, subdivision, use and development provisions need to give effect to the National Policy Statement for Freshwater Management direction.
149.131	Royal Forest and Bird Protection Society of New Zealand Incorporated	General	Amend	AMEND the Proposed District Plan to effectively include cross-referencing to Natural Environment Values and District-wide sections (inferred).	<ul style="list-style-type: none"> Integrating provisions will ensure clarity, integration and consistency of application. The submitter notes there is no explicit cross-referencing to relevant District-wide provisions. For example, the General rural zone features rivers, streams, wetlands, and likely pockets of indigenous vegetations and habitats. However, there is no express cross-referencing back to those parts of the Proposed District Plan which manage the effects of land use and development on such values. Amending the plan to include stronger cross-referencing would help plan users to understand the complete set of requirements for an activity, and to ensure the recognition and management of natural environment values.
149.133	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Environment	Amend	<p>AMEND SD-NE-O1 as follows:</p> <p>Indigenous biodiversity is, <u>including indigenous vegetation, ecosystems, indigenous species and their habitats, are</u> protected, maintained <u>and</u> or-enhanced.</p> <p>AND</p> <p>ADD the activities from which indigenous biodiversity should be protected from (i.e., subdivision, land use and development) to SD-NE-O1.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter supports an indigenous biodiversity objective being included but is concerned with the use of "or" within the provision. "Or" indicates an option, i.e., that only one of the outcomes is sufficient. It is requested that "or" is replaced with "and" to ensure the intent behind SD-NE-O1 is not undermined and to provide clarity regarding the outcomes sought. The submitter also considers that the objective should list the things that contribute to indigenous biodiversity and include those activities from which indigenous biodiversity should be protected.
149.134	Royal Forest and Bird Protection Society of New Zealand Incorporated	Foreword	Amend	<p>AMEND the Foreword chapter to include the following:</p> <ul style="list-style-type: none"> A description of the Kaipara District's natural values, including biodiversity, landscape, freshwater and coastal environments; and Clear expression of the Proposed District Plan role in enabling appropriate use and development, protecting and maintaining natural environment values through managing subdivision, use and development. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes the Foreword chapter of the Proposed District Plan in part. It is acknowledged that the Kaipara District is growing and, as such, Council seeks to produce a simple and enabling Proposed District Plan. The proposed introductory sections emphasise enabling growth and development, as well as the use of natural and physical resources. Though these are important elements for wellbeing within Kaipara, it is requested that these sections are amended to reflect the District's natural values, including its landscapes indigenous biodiversity, freshwater and coastal ecosystems, and other taonga. All of these elements shape Kaipara's identity. A district plan should promote the sustainable management of natural and physical resources which involves enabling land use and development while safeguarding the life-supporting capacity of natural resources and managing environmental effects by avoidance, mitigation or remedy. The submitter considers that the Proposed District Plan's introductory sections should align with the purpose of the Resource Management Act and national direction instruments, including the National Policy Statement for Freshwater Management, New Zealand Coastal Policy Statement and National Policy Statement for Indigenous Biodiversity. The recognition of natural values and requiring early protection will enable a more balanced and integrated approach.

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149.135	Royal Forest and Bird Protection Society of New Zealand Incorporated	Description of the District	Amend	<p>AMEND the Description of the District chapter to include the following:</p> <ul style="list-style-type: none"> A description of the Kaipara District's natural values, including biodiversity, landscape, freshwater and coastal environments; and Clear expression of the Proposed District Plan role in enabling appropriate use and development, protecting and maintaining natural environment values through managing subdivision, use and development. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes the Description of the District chapter of the Proposed District Plan in part. It is acknowledged that the Kaipara District is growing and, as such, Council seeks to produce a simple and enabling Proposed District Plan. The proposed introductory sections emphasise enabling growth and development, as well as the use of natural and physical resources. Though these are important elements for wellbeing within Kaipara, it is requested that these sections are amended to reflect the District's natural values, including its landscapes indigenous biodiversity, freshwater and coastal ecosystems, and other taonga. All of these elements shape Kaipara's identity. A district plan should promote the sustainable management of natural and physical resources which involves enabling land use and development while safeguarding the life-supporting capacity of natural resources and managing environmental effects by avoidance, mitigation or remedy. The submitter considers that the Proposed District Plan's introductory sections should align with the purpose of the Resource Management Act and national direction instruments, including the National Policy Statement for Freshwater Management, New Zealand Coastal Policy Statement and National Policy Statement for Indigenous Biodiversity. The recognition of natural values and requiring early protection will enable a more balanced and integrated approach.
149.136	Royal Forest and Bird Protection Society of New Zealand Incorporated	Infrastructure	Amend	<p>AMEND INF-P2 to expressly recognise that infrastructure must be located and designed to avoid, remedy, or mitigate adverse effects on the environment and significant values.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes enabling infrastructure policies INF-P1 to P4 in part and considers each lacks sufficient recognition of both site and area-specific constraints and characteristics, including matters of national importance under Section 6 Resource Management Act. The submitter acknowledges that infrastructure is essential, but considers that its development must protect significant values, including indigenous biodiversity and natural character. To have unqualified enabling policies will potentially undermine values that require active protection.
149.137	Royal Forest and Bird Protection Society of New Zealand Incorporated	Infrastructure	Amend	<p>AMEND INF-P3 to expressly recognise that infrastructure must be located and designed to avoid, remedy, or mitigate adverse effects on the environment and significant values.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes enabling infrastructure policies INF-P1 to P4 in part and considers each lacks sufficient recognition of both site and area-specific constraints and characteristics, including matters of national importance under Section 6 Resource Management Act. The submitter acknowledges that infrastructure is essential, but considers that its development must protect significant values, including indigenous biodiversity and natural character. To have unqualified enabling policies will potentially undermine values that require active protection.
149.138	Royal Forest and Bird Protection Society of New Zealand Incorporated	Infrastructure	Amend	<p>AMEND INF-P4 to expressly recognise that infrastructure must be located and designed to avoid, remedy, or mitigate adverse effects on the environment and significant values.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes enabling infrastructure policies INF-P1 to P4 in part and considers each lacks sufficient recognition of both site and area-specific constraints and characteristics, including matters of national importance under Section 6 Resource Management Act. The submitter acknowledges that infrastructure is essential, but considers that its development must protect significant values, including indigenous biodiversity and natural character. To have unqualified enabling policies will potentially undermine values that require active protection.
149.139	Royal Forest and Bird Protection Society of New Zealand Incorporated	Infrastructure	Amend	<p>AMEND INF-P16 to clearly state protection of values in relation to waterbodies, freshwater ecosystems, coastal water quality, and prioritising health and wellbeing of water and ecosystems.</p> <p>AND</p>	<ul style="list-style-type: none"> Policies 22 and 23 of the New Zealand Coastal Policy Statement and Policies 3 and 5 of the National Policy Statement for Freshwater Management require specific outcomes for stormwater and wastewater discharges. The submitter considers that INF Policies should be amended to reflect Policies 22 and 23 of the New Zealand Coastal Policy Statement and Policies 3

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				Any consequential amendments and alternative relief to address the concerns raised.	and 5 of the National Policy Statement for Freshwater Management, in order for the Proposed District Plan to give effect to national direction.
149.140	Royal Forest and Bird Protection Society of New Zealand Incorporated	Infrastructure	Amend	AMEND INF-P17 to clearly state protection of values in relation to waterbodies, freshwater ecosystems, coastal water quality, and prioritising health and wellbeing of water and ecosystems. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> Policies 22 and 23 of the New Zealand Coastal Policy Statement and Policies 3 and 5 of the National Policy Statement for Freshwater Management require specific outcomes for stormwater and wastewater discharges. The submitter considers that INF Policies should be amended to reflect Policies 22 and 23 of the New Zealand Coastal Policy Statement and Policies 3 and 5 of the National Policy Statement for Freshwater Management, in order for the Proposed District Plan to give effect to national direction.
149.141	Royal Forest and Bird Protection Society of New Zealand Incorporated	Notable Trees	Amend	ADD the following matter of discretion for Notable Tree chapter rules: <u>effects on the relevant rules of the tree, as identified in TREE-O1.</u> AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> The matters of discretion do not include consideration of the effects of the tree as outlined in TREE-O1. The submitter considers that, without this, a risk arises that consent decisions will not account for those broader ecological, cultural and amenity values associated with notable trees.
149.142	Royal Forest and Bird Protection Society of New Zealand Incorporated	Notable Trees	Amend	AMEND TREE-R3 to specify an activity status where performance standards are not met: AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> There is no activity status for the specified rules for when performance standards are not met. This creates ambiguity for plan users and decision-makers and risks undermining the rule framework.
149.143	Royal Forest and Bird Protection Society of New Zealand Incorporated	Notable Trees	Amend	AMEND TREE-R5 to specify an activity status where performance standards are not met. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> There is no activity status for the specified rules for when performance standards are not met. This creates ambiguity for plan users and decision-makers and risks undermining the rule framework.
149.144	Royal Forest and Bird Protection Society of New Zealand Incorporated	Notable Trees	Amend	AMEND TREE-R7 to specify an activity status where performance standards are not met. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> There is no activity status for the specified rules for when performance standards are not met. This creates ambiguity for plan users and decision-makers and risks undermining the rule framework.
149.145	Royal Forest and Bird Protection Society of New Zealand Incorporated	Ecosystems and Indigenous Biodiversity	Amend	ADD policies to the Ecosystems and Indigenous Biodiversity chapter regarding the following matters to give effect to the National Policy Statement for Indigenous Biodiversity: <ul style="list-style-type: none"> Indigenous biodiversity that is not significant (National Policy Statement for Indigenous Biodiversity Policy 8) Identifying areas that support indigenous biodiversity (National Policy Statement for Indigenous Biodiversity Policies 6, 15 and 17) Resilience of indigenous biodiversity to the effects of climate change (National Policy Statement for Indigenous Biodiversity Policy 4) Increasing indigenous vegetation cover (National Policy Statement for Indigenous Biodiversity Policy 14) Recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity (National Policy Statement for Indigenous Biodiversity Objective and Policy 2) Specified highly mobile fauna (National Policy Statement for Indigenous Biodiversity Policy 15) Required application of the effects management hierarchy to manage effects on indigenous biodiversity and demonstration of application by applicants in accordance with 	<ul style="list-style-type: none"> The submitter's overarching submission points seek new objectives, and related policies are added to the Proposed District Plan in order to give effect to the National Policy Statement for Indigenous Biodiversity. New provisions should be a comprehensive package in order to ensure the protection and maintenance of indigenous biodiversity is achieved.

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				<p>National Policy Statement for Indigenous Biodiversity clauses 3.10, 3.11, 3.15 and 3.16.</p> <ul style="list-style-type: none"> Required application of the biodiversity offsetting and compensation principles in National Policy Statement for Indigenous Biodiversity Appendix 3 and 4. <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	
149.146	Royal Forest and Bird Protection Society of New Zealand Incorporated	Coastal Environment	Amend	<p>ADD to the Coastal Environment chapter an explanation and reference to the Ecosystems and Indigenous Biodiversity chapter regarding biodiversity matters within the coastal environment.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter is concerned that it may not be clear to plan users to look beyond the Coastal Environment chapter. A clear explanation and reference in the Coastal Environment chapter/section to the Ecosystems and Indigenous Biodiversity chapter is needed to ensure the Proposed District Plan is clear and effective.
149.147	Royal Forest and Bird Protection Society of New Zealand Incorporated	Ecosystems and Indigenous Biodiversity	Amend	<p>ADD a new controlled rule for ECO-R1.1.f. with the following matters of control:</p> <ul style="list-style-type: none"> An assessment applying the Regional Policy Statement significance criteria. Location of building platform/site and access requirements to minimise clearance of indigenous vegetation and protect areas of highest biodiversity values. Need for any covenant to protect significant indigenous biodiversity values 	<ul style="list-style-type: none"> The rule permits a broad range of indigenous vegetation clearance activities without any requirements to manage adverse effects. As drafted, the rule risks undermining the protection and maintenance of indigenous biodiversity. It effectively provides blanket permitted activity status for clearance in sensitive areas, without applying an effects management or considering whether the vegetation supports significant ecological values. This is particularly concerning given the plan does not include an overlay of mapped significant areas which could be excluded from this rule. There is no requirement to assess the significance of vegetation being cleared, nor are there limits based on ecological context, habitat types, or connection to Significant Natural Areas. This approach could result in the incremental loss of ecologically important indigenous vegetation across Kaipara.
149.148	Royal Forest and Bird Protection Society of New Zealand Incorporated	Ecosystems and Indigenous Biodiversity	Amend	<p>ADD a catch-all rule for any use or development not provided for in the Ecosystems and Indigenous Biodiversity chapter as a discretionary activity.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter considers that new rules should be added to the Proposed District Plan as the National Policy Statement for Indigenous Biodiversity requires that adverse effects on indigenous biodiversity from new subdivision, use and development are avoided or managed (Policies 7 and 8). As proposed, the Ecosystems and Biodiversity chapter does not give effect to National Policy Statement for Indigenous Biodiversity direction.
149.149	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Character	Amend	<p>ADD matters of discretion to NATC-R2 that address natural character effects where performance standards are not met.</p> <p>AND</p> <p>ADD performance standards to NATC-R2 for restricted discretionary activities related to preserving natural character.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> Where compliance is not achieved with the permitted rule, it is restricted discretionary and subject to performance standards. However, the matters of discretion are not included within the rules, nor are standards. This could be a drafting error which will need to be addressed.
149.150	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Character	Amend	<p>ADD matters of discretion to NATC-R3 that address natural character effects where performance standards are not met.</p> <p>AND</p> <p>ADD performance standards to NATC-R3 for restricted discretionary activities related to preserving natural character.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> Where compliance is not achieved with the permitted rule, it is restricted discretionary and subject to performance standards. However, the matters of discretion are not included within the rules, nor are standards. This could be a drafting error which will need to be addressed.
149.151	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Character	Amend	<p>ADD matters of discretion to NATC-R4 that address natural character effects where performance standards are not met.</p>	<ul style="list-style-type: none"> Where compliance is not achieved with the permitted rule, it is restricted discretionary and subject to performance standards. However, the

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	Zealand Incorporated			<p>AND</p> <p>ADD performance standards to NATC-R4 for restricted discretionary activities related to preserving natural character.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<p>matters of discretion are not included within the rules, nor are standards. This could be a drafting error which will need to be addressed.</p>
149.152	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Character	Amend	<p>ADD a new discretionary rule to the Natural Character chapter for subdivision in natural character areas.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> Subdivision is not covered by these rules, but this activity can be expected to be proposed in these areas. Section 6 of the Resource Management Act requires Kaipara Council to protect natural character from inappropriate subdivision, use and development.
149.153	Royal Forest and Bird Protection Society of New Zealand Incorporated	Natural Character	Amend	<p>ADD permitted and restricted discretionary rules to the Natural Character chapter for the establishment, maintenance and upgrade of accessways and tracks in natural character areas (to which apply the earthworks and indigenous vegetation clearance standards and a new standard requiring formed width to be 1.5m).</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> The submitter opposes NATC-R1 - R4 (NATC Rules) in part for the following reasons: <ul style="list-style-type: none"> Establishing accessways and tracks are not covered by NATC Rules. However, both activities are expected within such areas. Section 6(a) Resource Management Act requires Council to protect natural character from inappropriate subdivision, use and development.
150.1	Dargaville Racing Club	General	Support	<p>RETAIN the provisions throughout the Proposed District Plan which apply to Private Plan Change 81 without alteration.</p>	<ul style="list-style-type: none"> Plan Change 81 has been through considerable public consultation and a hearing process, which went to the Environment Court. As part of Plan Change 81, significant supporting documentation was provided. Given recent comments from Central Government with regard to housing development, and the Government involved with Plan Change 81, the submitter does not think it would be wise to place further impediments, or obstacles for housing development on the land subject to Plan Change 81. To continue to provide space for affordable housing opportunities.
150.2	Dargaville Racing Club	General	Support	<p>RETAIN the provisions throughout the Proposed District Plan which apply to Private Plan Change 82 without alteration.</p>	<ul style="list-style-type: none"> Plan Change 82 has been through considerable public consultation and a hearing process. Significant time and cost input contributed to Plan Change 82. Given recent comments from Central Government with regard to housing development, the submitter does not think it would be wise to place further impediments, or obstacles for housing development on the land subject to Plan Change 82. To continue to provide space for affordable housing opportunities.
151.1	Mangawhai Bush Estate	Planning Maps	Oppose	<p>DELETE the Mangawhai/Hakaru Growth Area Overlay and mapped extent from 1083 Kaiwaka-Mangawhai Road.</p>	<ul style="list-style-type: none"> The Mangawhai/Hakaru Growth Area Overlay is inconsistent with Part 2, section 7b of the Resource Management Act as it provides a blanket restriction and constrains development within a large area which is close to/contains existing services and infrastructure. The Mangawhai/Hakaru Growth Area Overlay does not enable and ensure co-ordinated subdivision and development and therefore does not appropriately give effect to the National Policy Statement for Urban Development, or the Northland Regional Policy Statement as Mangawhai/Mangawhai Heads is an Urban Environment and can be considered an urban growth area. The proposed district plan does not meet the requirements of the Northland Regional Policy Statement (specifically objective 3.5, and policies 5.1.1 and 5.1.3) which aims to ensure that urban development is strategically planned, integrated within infrastructure and is located in appropriate areas and consolidated compact urban form.

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					<ul style="list-style-type: none"> The Mangawhai/Hakaru Growth Area Overlay is inconsistent with Kaipara District Council's Long-Term Plan. The Mangawhai/Hakaru Growth Area Overlay has no sound planning rationale behind the approach to restrict infill residential development which acts as a constraint rather than a growth management tool. The restriction within the Mangawhai/Hakaru Growth Area Overlay enables the creation of smaller sites elsewhere in the District which results in level or rural sprawl and adverse effects on rural character within the wider district. The policy behind the framework for the justification of the Mangawhai/Hakaru Growth Area Overlay is based on ensuring consolidation of infrastructure (including transport and social infrastructure) to sustainably manage growth, however rural development is generally serviced on site, and any strain on Council infrastructure can be mitigated through development contributions in urban areas. Placing a development restriction over the buffer zones of Mangawhai will not generate competitive growth of retail in other areas.
151.2	Mangawhai Bush Estate	General	Amend	<p>DELETE any policy framework associated with the Mangawhai/Hakaru Growth Area Overlay (including but not limited to SD-UFD-P7, SUB-P6, SUB-P12, consequential amendments to SUB-P8),</p> <p>AND</p> <p>DELETE any methods including rules associated with this overlay associated from the proposed District Plan (including but not limited to SUB-R2.11).</p>	<ul style="list-style-type: none"> The Mangawhai/Hakaru Growth Area Overlay is inconsistent with Part 2, section 7b of the Resource Management Act as it provides a blanket restriction and constrains development within a large area which is close to/contains existing services and infrastructure. The Mangawhai/Hakaru Growth Area Overlay does not enable and ensure co-ordinated subdivision and development and therefore does not appropriately give effect to the National Policy Statement for Urban Development, or the Northland Regional Policy Statement as Mangawhai/Mangawhai Heads is an Urban Environment and can be considered an urban growth area. The proposed district plan does not meet the requirements of the Northland Regional Policy Statement (specifically objective 3.5, and policies 5.1.1 and 5.1.3) which aims to ensure that urban development is strategically planned, integrated within infrastructure and is located in appropriate areas and consolidated compact urban form. The Mangawhai/Hakaru Growth Area Overlay is inconsistent with Kaipara District Council's Long-Term Plan. The Mangawhai/Hakaru Growth Area Overlay has no sound planning rationale behind the approach to restrict infill residential development which acts as a constraint rather than a growth management tool. The restriction within the Mangawhai/Hakaru Growth Area Overlay enables the creation of smaller sites elsewhere in the District which results in level or rural sprawl and adverse effects on rural character within the wider district. The policy behind the framework for the justification of the Mangawhai/Hakaru Growth Area Overlay is based on ensuring consolidation of infrastructure (including transport and social infrastructure) to sustainably manage growth, however rural development is generally serviced on site, and any strain on Council infrastructure can be mitigated through development contributions in urban areas. Placing a development restriction over the buffer zones of Mangawhai will not generate competitive growth of retail in other areas.
151.3	Mangawhai Bush Estate	Planning Maps	Amend	<p>AMEND the zoning of 1083 Kaiwaka Mangawhai Road from General rural zone to Rural lifestyle zone.</p>	<ul style="list-style-type: none"> The proposed zoning is inappropriate and does not reflect the existing character of the immediate area. The subject site and immediate surrounds within Mangawhai does not meet the zone overview. The proposed zoning is inconsistent with the adopted spatial plan.

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					<ul style="list-style-type: none"> Reverse sensitivity may occur due to the imposition of a rural zone in an area which is predominantly rural lifestyle. There is no adequate buffer zone between residential and general rural within Mangawhai and Hakaru. The site and the Mangawhai and Hakaru extent is predominantly rural lifestyle in character, not general rural.
151.4	Mangawhai Bush Estate	Financial Contributions	Amend	DELETE the Financial Contribution rules. AND PROVIDE a method that relies on Council's Development Contribution Policy.	<ul style="list-style-type: none"> The financial contributions rules are unclear and are a double up as Council also has a development contributions policy which can be reviewed more frequently than the District Plan and aligns with Council's long-term planning. The financial contributions within the District Plan do not allow for discretion of financial contributions to be applied and do not allow for funds to be ring fenced. It is more appropriate to use development contributions which are specific to an area. The methods should refer to the Council's Development Contributions Policy.
151.5	Mangawhai Bush Estate	Urban Form and Development	Oppose	DELETE SD-UFD-P7.	<ul style="list-style-type: none"> 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. 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. 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. The Overlay is inconsistent with the Councils Long Term Plan. 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. 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.
151.6	Mangawhai Bush Estate	Subdivision	Oppose	DELETE SUB-P6.	<ul style="list-style-type: none"> 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. 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. 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. The Overlay is inconsistent with the Councils Long Term Plan. 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. 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.
151.7	Mangawhai Bush Estate	Subdivision	Oppose	DELETE SUB-P12.	<ul style="list-style-type: none"> 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.

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					<ul style="list-style-type: none"> 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. 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. The Overlay is inconsistent with the Councils Long Term Plan. 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. 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.
151.8	Mangawhai Bush Estate	Subdivision	Amend	AMEND SUB-P8 as a consequence of deleting the Mangawhai/Hakaru Growth Management Area.	<ul style="list-style-type: none"> 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. 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. 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. The Overlay is inconsistent with the Councils Long Term Plan. 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. 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.
151.9	Mangawhai Bush Estate	Subdivision	Oppose	DELETE SUB-R2.11. and any other rules associated with the Mangawhai/Hakaru Growth Management Area.	<ul style="list-style-type: none"> 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. 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. 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. The Overlay is inconsistent with the Councils Long Term Plan. 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. 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.
151.10	Mangawhai Bush Estate	Financial Contributions	Amend	AMEND the Proposed District Plan so that any contributions are targeted and site specific in regard to 1083 Kaiwaka-Mangawhai Road.	<ul style="list-style-type: none"> The financial contributions within the District Plan do not allow for discretion of financial contributions to be applied and do not allow for funds to be ring fenced to the area of effect for the activity creating the effect, therefore there will continue to be social and environmental infrastructure areas created outside the areas of need. It is more appropriate to use development contributions which are specific to an area.

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					<ul style="list-style-type: none"> The methods should refer to the Council's Development Contributions Policy.
152.1	Atlas Quarries Ltd and Hukatere Quarries Ltd	Definitions	Amend	<p>AMEND the definition of "Sensitive activity" to read as follows:</p> <p><u>means activities that are affected by the adverse effects associated with lawfully established activities or activities that could be expected within that location.</u></p> <p>AND</p> <p>Any consequential amendments.</p>	<ul style="list-style-type: none"> The submitter has sought the above amendment to provide clarification that sensitive activities means activities that are affected by adverse effects associated with lawfully established activities.
152.2	Atlas Quarries Ltd and Hukatere Quarries Ltd	Planning Maps	Amend	<p>ADD a Quarry Zone, or Quarry Overlay into the Proposed District Plan Maps which:</p> <ul style="list-style-type: none"> Identifies all regionally significant mineral resources. Includes a 500m setback from all identified regionally significant mineral sources. <p>AND</p> <p>Any consequential amendments.</p>	<ul style="list-style-type: none"> The proposed district plan does not give effect to Parts 2 and 3 of the Resource Management Act, and the provisions of the Northland Regional Policy Statement. The Northland Regional Policy Statement requires District Council to show regionally significant mineral resources where the existing extraction rates are known or identified and mapped by Northland Regional Council.
152.3	Atlas Quarries Ltd and Hukatere Quarries Ltd	Planning Maps	Amend	<p>AMEND the zoning of Lot 4 DP 207528, Lot 1 DP 208321 and Section 1 SO 67448 as Commercial zone and/or Heavy industrial zone.</p> <p>AND</p> <p>Any consequential amendments.</p>	<ul style="list-style-type: none"> Lot 4 DP 207528, Lot 1 DP 208321 and Section 1 SO 67448 are held together and are located opposite Brynderwyn Quarry and can support quarry operations by way of mitigation and providing operational areas. The property is well placed to provide for commercial activities given their locations, and proximity to the proposed State Highway 1 realignment.
152.4	Atlas Quarries Ltd and Hukatere Quarries Ltd	General	Amend	<p>ADD a new Minerals chapter into Part 2, or Part 3 of the Proposed District Plan which provides for:</p> <ul style="list-style-type: none"> Specific quarrying provisions to regulate such quarrying activities for regionally significant quarries and all other quarrying activity (excluding farm quarries); Provisions for Mineral Resources which are not currently being extracted, and unable to be identified on the District Plan Maps; Vegetation clearance, site access, noise, vibration and vehicle movements; The National Planning Standards as relevant; and Any other relevant standards. <p>AND</p> <p>DELETE all provisions relating to quarrying activities (excluding farm quarries), and/or provisions which inadvertently capture quarrying activities.</p> <p>AND</p> <p>Any consequential amendments.</p>	<ul style="list-style-type: none"> The proposed plan provisions do not give effects to Parts 2 and 3 of the Resource Management Act, and the provisions of the Northland Regional Policy Statement. Specific mineral extraction provisions must be developed for regionally significant mineral resources. The Proposed District Plan does not give adequate effect to Policy 5.1.5 of the Regional Policy Statement. The proposed provisions do not adequately address cross-boundary issues.
152.5	Atlas Quarries Ltd and Hukatere Quarries Ltd	General	Amend	<p>ADD into all zones a policy and rule framework to provide for regionally significant mineral resources, and direct development away from such resources (as included in mapped buffer areas in submission point 152.2) which includes:</p> <ul style="list-style-type: none"> Development of sensitive activities within the quarry buffer area as a non-complying activity. Development within 500m of a lawfully established quarry operation as a discretionary activity. <p>AND</p> <p>AMEND the Proposed District Plan to provide for quarrying activities for any provision which captures quarrying activities.</p> <p>AND</p> <p>Any consequential amendments.</p>	<ul style="list-style-type: none"> The provisions of the proposed district plan do not adequately give effect to Parts 2 and 3 of the Resource Management Act, or the Northland Regional Policy Statement provisions. Consultation is required with the owners of regionally significant mineral resources when subdivision, land use or development may have an adverse effect on the operation, maintenance, or upgrade of regionally significant mineral resources.

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152.6	Atlas Quarries Ltd and Hukatere Quarries Ltd	General	Amend	<p>ADD a new Minerals zone into Part 3 of the Proposed District Plan which provides for:</p> <ul style="list-style-type: none"> Specific quarrying provisions to regulate such quarrying activities for regionally significant quarries and all other quarrying activity (excluding farm quarries); Provisions for Mineral Resources which are not currently being extracted, and unable to be identified on the District Plan Maps; Vegetation clearance, site access, noise, vibration and vehicle movements; The National Planning Standards as relevant; and Any other relevant standards. <p>AND</p> <p>DELETE all provisions relating to quarrying activities (excluding farm quarries), and/or provisions which inadvertently capture quarrying activities.</p> <p>AND</p> <p>Any consequential amendments.</p>	<ul style="list-style-type: none"> The proposed plan provisions do not give effect to Parts 2 and 3 of the Resource Management Act, and the provisions of the Northland Regional Policy Statement. Specific mineral extraction provisions must be developed for regionally significant mineral resources. The Proposed District Plan does not give adequate effect to Policy 5.1.5 of the Regional Policy Statement. The proposed provisions do not adequately address cross-boundary issues.
153.1	Mohindar Randhawa	Planning Maps	Amend	<p>ADD a specific provision or new overlay to apply to 6 hectares of the property at 54 Mangawhai Heads Road, Mangawhai Heads to enable a development for the exclusive use of residents aged 50 years and over including:</p> <ul style="list-style-type: none"> A higher residential density than the current General residential zone allows. The submission seeks the net site area be reduced to 400m²; Allow single storey villa-style dwellings or similarly scaled housing typologies (and associated structures and communal facilities) as a permitted activity; Objectives, policies and rules tailored to age-appropriate residential development; Allow for communal infrastructure, services, and facilities as a permitted activity; Flexibility for minor boundary adjustments within the precinct during a detailed design phase to optimise site layout and infrastructure efficiency; A streamlined consent process for developments that comply with the precinct provisions, and Provision for appropriate signage and wayfinding within the precinct. 	<ul style="list-style-type: none"> There is a demographic demand for this type of living arrangement. There is a shift in the housing market for compact, well-designed low-maintenance housing in the 50+ demographic. Allowing higher residential density is an efficient use of land and aligns with the national urban development goals. The proposed precinct is aligned with the strategic objectives outlined in Kaipara District Council's planning framework. Infrastructure capacity and servicing requirements can be provided for within the site or can be otherwise confirmed. The precinct will embrace environmental sustainability principles which align with contemporary planning practice and community expectations. The precinct will align with statutory frameworks. The precinct will allow for integration, intergenerational opportunities, economic and social benefits. The designated area for the precinct is suitable for the precinct. An implementation and management framework will be provided.
154.1	Auckland GE-Free Coalition	General	Amend	<p>ADD the precautionary and prohibitive provisions, policies and rules for Genetic Engineering/Genetically Modified Organisms (GE/GM) consistent with the wording contained in the Kaipara District Council Draft District Plan (September 2022 exposure draft), the findings of the Northland/Auckland Inter Council Working Party on GMOs, and the Northland Regional Policy Statement direction on Genetically Modified Organisms.</p>	<ul style="list-style-type: none"> Kaipara District Council should act on its obligations as a formative member of the Northland/Auckland Inter Council Working Party on GMO risk Evaluation and Management Options. The provisions are necessary to protect the district's biosecurity, wider environment, economy, the "northland, naturally" brand, existing GM free farmers/primary producers, food sovereignty and the ability of Kaipara residents to grow and eat clean and safe GM free food. Kaipara District Council should act in keeping with case law, the findings of the Northland/Auckland Inter Council Working Party, the wishes of ratepayers and residents. It is not enough for Council to rely on a national regulator, and local protections should be put in place. Outdoor GE/GMOs are not contained within property boundaries (contamination spread through pollen, seeds, wind, soil, etc). Farmers/landowners and their enterprises need protective. Kaipara District Council should respect and support the precautionary and prohibitive

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					GE/GMO policies of various Tai Tokerau Iwi for their respective rohe.
154.2	Auckland GE-Free Coalition	General	Support	Kaipara District Council to actively engage with the other Councils (Northland Regional Council and Far North District Council) who have made submissions opposing the Gene Technology Bill and all the members of the Northland/ Auckland ICWP on GMOs to identify common concerns and cost-effective collaboration to protect our valuable GM Free Food Producer Region (south Auckland-Cape Reinga/Far North). This includes maintaining oversight of the risks of unregulated SDN1 and SDN2 organisms to the local environment being prepared for the Hauraki Gulf Forum in Auckland Region.	<ul style="list-style-type: none"> There are environmental , socio-cultural and economic risks.
155.1	Trina Upperton	General	Amend	ADD the precautionary and prohibitive provisions, policies and rules for Genetic Engineering/Genetically Modified Organisms (GE/GMO) consistent with the wording contained in the Kaipara District Council Draft District Plan.	<ul style="list-style-type: none"> Provisions are needed to protect the district's biosecurity, wider environment, economy, the "Northland, naturally' brand, existing GM free farmers/primary producers, food sovereignty and the ability of Kaipara residents to grow and eat clean and safe GM free food. Kaipara District Council should act in keeping with case law, the findings of the Northland/Auckland Inter Council Working Party, the wishes of ratepayers and residents. It is not enough for Council to rely on a national regulator, and local protections should be put in place. Outdoor GE/GMOs are not contained within property boundaries (contamination spread through pollen, seeds, wind, soil, etc). Farmers/landowners and their enterprises need protection.
155.2	Trina Upperton	General	Amend	ADD rules which make field release of GMO a prohibited activity as long as the risks of wider environmental contamination remain.	<ul style="list-style-type: none"> Provisions are needed to protect the district's biosecurity, wider environment, economy, the "Northland, naturally' brand, existing GM free farmers/primary producers, food sovereignty and the ability of Kaipara residents to grow and eat clean and safe GM free food. Kaipara District Council should act in keeping with case law, the findings of the Northland/Auckland Inter Council Working Party, the wishes of ratepayers and residents. It is not enough for Council to rely on a national regulator, and local protections should be put in place. Outdoor GE/GMOs are not contained within property boundaries (contamination spread through pollen, seeds, wind, soil, etc). Farmers/landowners and their enterprises need protection.
156.1	Anthony Daniels	Planning Maps	Oppose	AMEND the zoning of the property at 129 Kaiwaka-Mangawhai Road, Kaiwaka from General residential zone to the current Rural zoning.	<ul style="list-style-type: none"> This location is not suitable for residential intensification at this time, The proposal introduces concerns around infrastructure, character, safety, and the broader planning direction for the area, Lack of infrastructure, Impact on rural character and amenity, Traffic and safety concerns, Reverse sensitivity issues, No clear justification for the site.
156.2	Anthony Daniels	Planning Maps	Amend	AMEND the General residential zoning to be limited to areas where there is confirmed infrastructure capacity in line with GRZ-P8 and GRZ-S11. Unserviced land like the property at 129 Kaiwaka-Mangawhai Road, Kaiwaka should not be enabled for intensification.	<ul style="list-style-type: none"> This location is not suitable for residential intensification at this time, The proposal introduces concerns around infrastructure, character, safety and the broader planning direction for the area, Lack of infrastructure, Impact on rural character and amenity, Traffic and safety concerns, Reverse sensitivity issues, No clear justification for the site.

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					<ul style="list-style-type: none"> General residential zone policies clearly expect future residential areas to be connected to reticulated water, wastewater and stormwater systems, This site doesn't currently have access to any of those services. Rezoning it now, without the infrastructure in place or even confirmed, runs counter to the policies of (GRZ-P8, GRZ-S11) and creates a real risk of poorly serviced development or environmentally risky onsite solutions.
156.3	Anthony Daniels	General	Amend	<p>AMEND the provisions so that future residential expansion in this area (inferred as being 129 Kaiwaka-Mangawhai Road, Kaiwaka) to be addressed through a comprehensive precinct or structure planning process with proper consideration given to infrastructure, environmental effects and community needs. Spot rezonings like this undermine integrated planning.</p>	<ul style="list-style-type: none"> This would align with GRZ-P8, and GRZ-S11, There is a lack of infrastructure, and the site doesn't have access to reticulated services, Rezoning without the infrastructure in place or confirmed conflicts with policies and creates risk of poorly serviced development, The rezoning would have an adverse impact on rural character and amenity as the medium density housing enabled through the proposed district plan would undermine the neighbourhood character and amenity and create a stark contrast with the existing environment, Rezoning would lead to an increase in traffic which would compound existing safety issues which have not been addressed adequately in the plan, Rezoning would create reverse sensitivity issues with new residential use and established rural activities, undermining the Proposed District Plan's goal to protect rural land and operations at the urban edge, There is no clear justification for the rezoning of this site.
156.4	Anthony Daniels	Planning Maps	Amend	<p>AMEND the Proposed District Plan to include clearer mapping of where greenfield residential growth is appropriate.</p> <p>AND</p> <p>AMEND the Proposed District Plan to exclude 129 Kaiwaka-Mangawhai Road, Kaiwaka from a greenfield residential growth area.</p>	<ul style="list-style-type: none"> This would align with GRZ-P8, and GRZ-S11, There is a lack of infrastructure, and the site doesn't have access to reticulated services, Rezoning without the infrastructure in place or confirmed conflicts with policies and creates risk of poorly serviced development, The rezoning would have an adverse impact on rural character and amenity as the medium density housing enabled through the proposed district plan would undermine the neighbourhood character and amenity and create a stark contrast with the existing environment, Rezoning would lead to an increase in traffic which would compound existing safety issues which have not been addressed adequately in the plan, Rezoning would create reverse sensitivity issues with new residential use and established rural activities, undermining the Proposed District Plan's goal to protect rural land and operations at the urban edge, There is no clear justification for the rezoning of this site.
157.1	K Evans	General	Amend	<p>ADD the precautionary and prohibitive provisions, policies and rules for Genetic Engineering/Genetically Modified Organisms from the Kaipara District Council Draft District Plan into the Proposed District Plan in alignment with the provisions of Whangarei District Council, Northland Regional Council, Far North District Council and Auckland Council.</p>	<ul style="list-style-type: none"> Kaipara District Council should act on its obligations as a formative member of the Northland/Auckland Inter Council Working Party on GMO risk Evaluation and Management Options. Kaipara District Council should ensure the Proposed District Plan has precautionary and prohibitive GE/GMO provisions, policies and rules in order to protect the district's biosecurity, wider environment, economy, the "northland, naturally' brand, existing GM free farmers/primary producers, food sovereignty and the ability of Kaipara residents to grow and eat clean and safe GM free food. Kaipara District Council should act in keeping with case law, the findings of the Northland/Auckland Inter Council Working Party, the wishes of ratepayers and residents. It is not enough for Council to rely on a national regulator, and local protections should be put in place.

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					<ul style="list-style-type: none"> Outdoor GE/GMOs are not contained within property boundaries (contamination spread through pollen, seeds, wind, soil, etc). Farmers/landowners and their enterprises need protective. Kaipara District Council should respect and support the precautionary and prohibitive GE/GMO policies of various Tai Tokerau Iwi for their respective rohe.
158.1	Manulife Forest Management NZ Ltd	Sites and Areas of Significance to Maori	Amend	<p>AMEND the wording of SASM-R3.1.a. as follows:</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. The activity is for the purposes of:</p> <p>i. Installation of fence posts;</p> <p>ii. Repair and maintenance of existing farm and commercial forestry infrastructure, including tracks and drains, provided the area and volume of land disturbed is limited to what is necessary to maintain the existing infrastructure along its existing alignment;</p> <p>...</p>	<ul style="list-style-type: none"> The submitter supports this rule in principle however has provided a minor amendment to include forestry infrastructure.
158.2	Manulife Forest Management NZ Ltd	Ecosystems and Indigenous Biodiversity	Support	RETAIN ECO-R1.	<ul style="list-style-type: none"> The submitter supports this rule, in particular the note that clarifies indigenous vegetation clearance associated with plantation forestry is regulated by the National Environmental Standards for Commercial Forestry.
158.3	Manulife Forest Management NZ Ltd	Natural Character	Amend	<p>AMEND NATC-R3 to read as follows:</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. The earthworks complies with NATC-S2 - Earthworks; and</p> <p>b. The earthworks is for the maintenance of lawfully established roads, fences, utility connections, driveways, parking areas, effluent disposal systems, swimming pools, walking or cycling tracks, or farm and <u>commercial</u> forestry tracks.</p>	<ul style="list-style-type: none"> The submitter supports the NATC-3 in principle, however, has suggested the amendment to ensure consistency throughout the plan.
158.4	Manulife Forest Management NZ Ltd	Natural Character	Amend	<p>AMEND NATC-R4.1.b as follows:</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. The activity complies with NATC-S3 - Indigenous vegetation clearance; or</p> <p>b. The indigenous vegetation clearance is for the maintenance of lawfully established roads, fences, utility connections, driveways, parking areas, effluent disposal systems, swimming pools, walking or cycling tracks, or farm and <u>commercial</u> forestry tracks.</p>	<ul style="list-style-type: none"> The submitter supports NATC-R4 in principle however has provided the suggested amendments to ensure consistency throughout the plan.
158.5	Manulife Forest Management NZ Ltd	Natural Features and Landscapes	Amend	<p>AMEND NFL-R3.1.b as follows:</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. The activity complies with NFL-S5 Indigenous vegetation clearance; or</p> <p>b. Clearance for the operation, repair or maintenance of the following activities where they have been lawfully established:</p> <p>i. Fences;</p> <p>ii. Infrastructure, including effluent disposal systems;</p> <p>iii. Buildings and swimming pools;</p> <p>iv. Driveways, parking areas and access;</p> <p>v. Walking tracks;</p> <p>vi. Cycling tracks; and</p> <p>vii. Farming and <u>commercial</u> forestry tracks; and</p>	<ul style="list-style-type: none"> The submitter supports this rule in principle, however, has suggested the amendment above to ensure consistency throughout the proposed district plan.
158.6	Manulife Forest Management NZ Ltd	Natural Features and Landscapes	Amend	<p>AMEND NFL-R4.1.b as follows:</p> <p>1. Activity status: Permitted</p> <p>Where:</p>	<ul style="list-style-type: none"> The submitter supports this rule in principle, however, has suggested the amendment above to ensure consistency throughout the proposed district plan.

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				<p>a. The earthworks complies with NFL-S4 Earthworks; or</p> <p>b. The earthworks is for the maintenance of lawfully established roads, fences, utility connections, driveways, parking areas, effluent disposal systems, swimming pools, walking or cycling tracks, or farm and commercial forestry tracks.</p>	
158.7	Manulife Forest Management NZ Ltd	Coastal Environment	Amend	<p>AMEND CE-R3.1.b as follows:</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. The activity complies with CE-S6 Maximum area of indigenous vegetation clearance; or</p> <p>b. The indigenous vegetation clearance is for the maintenance of lawfully established roads, fences, utility connections, driveways, parking areas, effluent disposal systems, swimming pools, walking or cycling tracks, or farm and <u>commercial</u> forestry tracks.</p>	<ul style="list-style-type: none"> The submitter supports this rule in principle, however, has suggested the amendment above to ensure consistency throughout the proposed district plan.
158.8	Manulife Forest Management NZ Ltd	Coastal Environment	Amend	<p>AMEND CE-R4.1.b.vii as follows:</p> <p>1. Activity Status: Permitted</p> <p>Where:</p> <p>b. ...</p> <p>viii. The earthworks is for the maintenance of lawfully established roads, fences, utility connections, driveways, parking areas, effluent disposal systems, swimming pools, walking or cycling tracks, or farm and <u>commercial</u> forestry tracks.</p>	<ul style="list-style-type: none"> The submitter supports this rule in principle, however, has suggested the amendment above to ensure consistency throughout the proposed district plan.
158.9	Manulife Forest Management NZ Ltd	Earthworks	Support	<p>RETAIN the overview statement in the Earthworks chapter as notified.</p>	<ul style="list-style-type: none"> The submitter supports the Earthworks Overview Statement as is acknowledges that commercial forestry is regulated by the National Environmental Standards for Commercial Forestry.
158.10	Manulife Forest Management NZ Ltd	Noise	Support	<p>RETAIN the Notes in the Noise rules as notified.</p>	<ul style="list-style-type: none"> The submitter supports the statement that noise from commercial forestry is regulated by the National Environmental Standards for Commercial Forestry.
158.11	Manulife Forest Management NZ Ltd	General Rural Zone	Amend	<p>AMEND GRUZ-S2.1 as follows:</p> <p>1. All buildings and structures must be set back at least:</p> <p>a. 3m from every site boundary; and</p> <p>b. 10m from the road frontage; <u>and</u></p> <p>c. <u>30m from commercial forestry.</u></p>	<ul style="list-style-type: none"> Many District Plan have provisions for setbacks of new buildings neighbouring commercial forestry, and Setbacks are required to provide for any health and safety issues (e.g. if a tree was to be blown over).
158.12	Manulife Forest Management NZ Ltd	Natural Features and Landscapes	Amend	<p>DELETE all commercial forestry from Outstanding Natural Landscape mapped areas.</p> <p>OR</p> <p>ADD a rule to allow for commercial forestry activities in Outstanding Natural Landscapes to be a permitted activity.</p>	<ul style="list-style-type: none"> The submitter supports the mapping of Outstanding Natural Landscape. However, they do not support the inclusion of commercial forestry in these areas to ensure that land captured under the Outstanding Natural Landscape is only land intended, and productive land is removed.
159.1	GE Free New Zealand	General	Amend	<p>ADD the provisions, policies and rules for Genetic Engineering/Genetically Modified Organisms from Kaipara District Council Draft District Plan, consistent with the wording contained in the findings of the Northland/Auckland ICWP on GMOs and the Northland Regional Policy Statement direction on Genetically Modified Organisms.</p>	<ul style="list-style-type: none"> Kaipara District Council is duty-bound to implement the GM/GE provisions through the Resource Management Act, case law and direction provided by the operative Northland Regional Policy Statement and Northland Regional Plan. The changes requested reflect the call by the community to adopt a cohesive precautionary and prohibitive activity approach which supports Tangata Whenua, farmers and the regional agricultural economy. GE Free New Zealand Kaipara members support the provisions proposed in the Exposure Draft, supporting adjoining Council Plans regarding GE and GMO.
160.1	Hayes Co Ltd	Planning Maps	Oppose	<p>AMEND the proposed zoning of land at 1981 State Highway 12, Dargaville (held in the title NA353/218) from Māori purpose zone to General rural zone.</p>	<ul style="list-style-type: none"> The proposed zoning at 1981 State Highway 12, Dargaville is opposed insofar as there appears to be a mapping error. The Māori Purpose Zone has been applied on the title NA353/218 which the submitter notes is fee simple, i.e., not Māori land. It is requested that the site's zoning is

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					<ul style="list-style-type: none"> amended to General Rural Zone in order to be consistent with neighbouring land. A certificate of title and zoning map of the subject site is attached to the submission.
161.1	BA and EJ Jones (partnership) and Healing Equine Assisted Activities	Planning Maps	Amend	<p>AMEND the zoning of the property at 62 Grey Street, Dargaville (Lot 1 DP 569425) from General residential zone to Rural lifestyle zone.</p>	<ul style="list-style-type: none"> The site is currently zoned Rural and has a number of constraints (easements, topography and flood hazard) making it more suited to a lower density Rural lifestyle zone. See submission for attached constraints maps. The Rural lifestyle zone would provide a logical transition between the General residential zone and General rural zone. The site meets the criteria for Rural lifestyle zones as stated in the section 32 report. The Rural lifestyle zone is compatible with the neighbouring Special purpose zone - Dargaville Hospital.
161.2	BA and EJ Jones (partnership) and Healing Equine Assisted Activities	Rural Lifestyle Zone	Amend	<p>AMEND the activity status of RLZ-R9 Community Facility from a discretionary activity to a restricted discretionary activity status with discretion restricted to:</p> <ol style="list-style-type: none"> Rural lifestyle character and amenity; Design and layout; Transport safety and efficiency; Scale of activity; Hours of operation; Infrastructure servicing; and Outdoor storage. 	<ul style="list-style-type: none"> The submitter considers that the Rural lifestyle zone is an appropriate location for community facilities, provided that certain matters are addressed, and a restricted discretionary status sends that signal. Assessment matters based on GRZ-MAT2 for GRZ-R15 Community Facilities in the General residential zone are considered to be applicable for inclusion in the Rural lifestyle zone.
161.3	BA and EJ Jones (partnership) and Healing Equine Assisted Activities	Rural Lifestyle Zone	Amend	<p>AMEND RLZ-O1 Land use activities as follows:</p> <p>The Rural lifestyle zone is used predominantly for low density residential activities, and small-scale primary production activities <u>and community facilities</u> that are compatible with the rural lifestyle character and amenity values of the zone.</p>	<ul style="list-style-type: none"> The submitter considers the Rural lifestyle zone an appropriate location for Community Facilities and that the objectives and policies of the zone should also reflect that.
161.4	BA and EJ Jones (partnership) and Healing Equine Assisted Activities	Rural Lifestyle Zone	Amend	<p>AMEND RLZ-P2 as follows:</p> <p>RLZ-P2 Allow certain complementary <u>complimentary</u> facilities and ancillary activities</p> <p>Enable home businesses, and visitor accommodation activities <u>and community facilities</u>, provided they are consistent with the rural lifestyle character and amenity values anticipated in the Rural lifestyle zone.</p>	<ul style="list-style-type: none"> The submitter considers the Rural lifestyle zone an appropriate location for Community Facilities and that the objectives and policies of the zone should also reflect that.
162.1	EP & M Wright	Planning Maps	Amend	<p>AMEND the zoning of the northern part of the property at 67 Kaiwaka-Mangawhai Road (Lot 3 DP 173678) from General rural zone to Rural lifestyle zone.</p> <p>OR</p> <p>Alternative relief with similar effect.</p> <p>AND</p> <p>RETAIN the General residential zone for the southern part of the property at 67 Kaiwaka-Mangawhai Road (Lot 3 DP 173678).</p>	<ul style="list-style-type: none"> The submitter opposes the proposed split zoning of their site. The land is currently zoned Rural under the Operative Plan; however, split zoning of General residential zone and General rural zone has been proposed as follows: <ul style="list-style-type: none"> The front/southern part of the property (approx. 8.1ha) is proposed to be General residential zone. The remainder/northern part of the property (approx. 17.75ha) is proposed to remain General rural zone. The submitter considers that General rural zone is not appropriate zoning for the northern part of the property in order to achieve the purpose of the Resource Management Act. Rather, the northern part is consistent with the Rural lifestyle zone purpose. The land adjoins General residential zoned land to the north where it has direct access from Kaiwaka-Mangawhai Road and proximity to State Highway 1. The land is not within a highly productive rural area (Class 4 soils) and is surrounded by rural lifestyle development on Kaiwaka-Mangawhai Road and Gibbons Road. It is submitted that rezoning the site to Rural lifestyle zone would reduce pressure on the General rural zone for ad hoc subdivision. Particularly for areas with agricultural value that are located a good distance from amenities. Refer to the submission document for a detailed assessment of the site's zoning and its

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					surrounds, including a Rural lifestyle zone objectives and policies assessment and figures showing the proposed and requested zoning.
163.1	I Petro & E Habili	Planning Maps	Amend	<p>AMEND the zoning of Lot 3 DP 204472, Kaiwaka-Mangawhai Road, Kaiwaka from General rural zone to Rural lifestyle zone</p> <p>OR</p> <p>Alternative relief with similar effect.</p> <p>See submission for maps of site.</p>	<ul style="list-style-type: none"> The Kaiwaka Spatial Plan identifies the land as appropriate for Low-Density Housing. The land is suited to a Rural lifestyle zone due to contour, watercourses and topographical constraints. The location is accessible from Kaiwaka township and is not highly productive. Rezoning would reduce the pressure for ad hoc subdivision in other areas of the General Rural zone. Alignment with the Rural lifestyle zone objectives and policies. See submission for full reasons and section 32 assessment.
164.1	New Zealand Heavy Haulage Association Inc	General	Amend	<p>AMEND Proposed District Plan to insert an express rule for all zones that provides for relocated (second hand) buildings as permitted activities, subject to performance standards and criteria as follows (or to similar effect):</p> <ol style="list-style-type: none"> <u>Any relocated building intended for use as a dwelling must have previously been designed, built and used as a dwelling.</u> <u>A building pre-inspection report shall accompany the application for a building consent for the destination site. That report is to identify all reinstatement works that are to be completed to the exterior of the building.</u> <u>The building shall be located on permanent foundations approved by building consent, no later than 2 months of the building being moved to the site.</u> <u>All other reinstatement work required by the building inspection report and the building consent to reinstate the exterior of any relocated dwelling shall be completed within 12 months of the building being delivered to the site. Without limiting (c) (above) reinstatement work is to include connections to all infrastructure services and closing in and ventilation of the foundations.</u> <u>The proposed owner of the relocated building must certify to the Council that the reinstatement work will be completed within the 12-month period.</u> <p>Relocated buildings that do not meet these standards to be restricted discretionary activities.</p> <p>AND</p> <p>ADD building pre-inspection report requirements for relocated buildings. See schedule 2 of submission for proposed form of pre-inspection report.</p>	<ul style="list-style-type: none"> To ensure that regulatory controls through the District Plan reflect the purpose and intentions of the Resource Management Act 1991 as expressed in Environment Court decision New Zealand Heavy Haulage Association Inc v The Central Otago District Council EnvCt C45/2004. There is no real difference in effect and amenity values between in situ construction of a dwelling and relocation of a second-hand dwelling, subject to appropriate standards. Relocated buildings are permitted in the General Residential zone (GRZ-R5), but not in other zones, appearing to default to a discretionary activity.
164.2	New Zealand Heavy Haulage Association Inc	General Residential Zone	Support	<p>RETAIN GRZ-R5</p> <p>AND</p> <p>ADD permitted activity standards to GRZ-R5 as follows (or to similar effect):</p> <p><u>The building shall be located on permanent foundations approved by building consent, no later than 2 months of the building being moved to the site.</u></p> <p><u>The proposed owner of the relocated building must certify to the Council that the reinstatement work will be completed within the 12-month period.</u></p>	<ul style="list-style-type: none"> The rule reflects the purpose and intentions of the Resource Management Act 1991 as expressed in Environment Court decision New Zealand Heavy Haulage Association Inc v The Central Otago District Council EnvCt C45/2004. There is no real difference in effect and amenity values between in situ construction of a dwelling and relocation of a second-hand dwelling, subject to appropriate standards. Providing for relocated buildings as a permitted activity subject to appropriate performance standards is generally in accordance with a proper section 32 evaluation in terms of costs and benefits. Installing a relocated building onto its foundations within 2 months is key to completing full reinstatement within 12 months.
164.3	New Zealand Heavy Haulage Association Inc	Definitions	Support	<p>RETAIN the definition of "relocated building".</p>	<ul style="list-style-type: none"> No specific reason provided, however submission supports additional permissive provisions for relocated buildings.

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165.1	TAP Adventures Ltd	Subdivision	Support	RETAIN SUB-S1.8. which sets out 12ha minimum net site area for the General rural zone.	<ul style="list-style-type: none"> The minimum net site area is consistent with the Operative District Plan. Subdividing contributes to the economy and provides benefits for landowners. 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.
165.2	TAP Adventures Ltd	Subdivision	Amend	ADD the following clauses to SUB-R1.1. Boundary Adjustments as follows: b. Boundary Adjustments comply with SUB-S1 to SUB-S7; or c. 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 d. 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 increased as a result of the boundary adjustment.	<ul style="list-style-type: none"> 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.
165.3	TAP Adventures Ltd	Subdivision	Support	RETAIN Rule SUB-R4 (note referencing error in submission) AND AMEND the subdivision objectives and policies to link to SUB-R4 and provide guidance for its implementation. OR ADD an objective or policy to link to SUB-R4 and provide guidance for its implementation.	<ul style="list-style-type: none"> The intention of the rule needs to be clarified. There needs to be a clear consenting pathway from the objectives and policies through to this rule. 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.
165.5	TAP Adventures Ltd	General	Amend	ADD clarification in Part 1 - How the Plan Works chapter that the subdivision rules provide for two (or more) rules to be used in one application. OR Amendments to achieve this outcome.	<ul style="list-style-type: none"> The current interpretation by Council's Consenting Team of Rule 12.12.1 General Rural Subdivision in the Operative District Plan has resulted in applications using this rule plus any other Operative District Plan rule becoming a non-complying activity because of the drafting of Rule 12.12.1(1)(a).
165.7	TAP Adventures Ltd	Subdivision	Support	RETAIN SUB-S5.1.b.	<ul style="list-style-type: none"> 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.
165.8	TAP Adventures Ltd	Financial Contributions	Oppose	AMEND Rule FC-S5.4.a.i. and ii. so that a set contribution amount is stated. OR AMEND FC-S5.4.a.i. and ii. as follows: 4. No contribution in money required under these provisions shall exceed the following amounts: a. Subdivision of land for principally residential purposes or rural purposes where the lots can accommodate a residential dwelling: i. Up to <u>2.5%</u> of the value of each additional lot that is 4000m ² or less. ii. Lots of more than 4000m ² - the contribution will be assessed on the basis of a 'nominal' 4000m ² site up to <u>2.5%</u> of the value.	<ul style="list-style-type: none"> The formula in FC-S5.4.a. is confusing and appears to result in a larger contribution than the Operative District Plan formula. The formula approach results in a lack of certainty for both applicants and Council's planning and budgeting. The 5% of lot value is excessive and should be halved.
165.9	TAP Adventures Ltd	General	Oppose	DELETE references to the Kaipara District Council Engineering Standards 2011 from the Proposed District Plan.	<ul style="list-style-type: none"> The Engineering Standards are 14 years old and were meant to be updated, but the Proposed District Plan proposes to retain reference to these until replaced. No timeframe is given. This approach will allow no opportunity for the Standards to be included in the public process and submitted on. In the absence of updated Engineering Standards, the relevant parts of the Standards should be updated and included in the Proposed District Plan.
166.1	Wearmouth Farm Company Limited	Planning Maps	Support	RETAIN the General residential zoning of a portion of 61-136 Whaka Street, Maungatūroto (Lot 1 DP 612109 and Lot 2	<ul style="list-style-type: none"> No reasons provided.

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				DP 612109). See submission for map of the site. OR Alternative relief with similar effect.	
166.2	Wearmouth Farm Company Limited	Subdivision	Support	RETAIN 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 ² . Where reticulated water supply and wastewater connections are not provided the minimum lot size is 600m ² . OR AMEND 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. OR Alternative relief with similar effect.	<ul style="list-style-type: none"> 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. 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. Significant increase in development contributions will outweigh the financial benefit that landowners obtain by selling serviced General residential zone titles. 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.
166.3	Wearmouth Farm Company Limited	Subdivision	Support	RETAIN 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 ² . Where reticulated water supply and wastewater connections are not provided the minimum lot size is 600m ² . OR AMEND 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. OR Alternative relief with similar effect.	<ul style="list-style-type: none"> 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. 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. Significant increase in development contributions will outweigh the financial benefit that landowners obtain by selling serviced General residential zone titles. 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.
166.4	Wearmouth Farm Company Limited	Planning Maps	Amend	AMEND the zoning of a portion of 61-136 Whaka Street, Maungatūroto (Lot 1 DP 529929 and Lot 3 DP 612109) so that both titles are entirely zoned General residential zone and do not have split zoning. See submission for map of site. OR Alternative relief with similar effect.	<ul style="list-style-type: none"> Rezoning part of Lot 1 DP 529929 and Lot 3 DP 612109 as Rural lifestyle zone will isolate the rural lifestyle land from what will otherwise be residential land. The approximately 4ha of the Rural lifestyle zone on Lot 1 DP 529929 and the approximately 2.85ha on Lot 3 DP 612109 will be the only parts of the property not zoned General residential zone. Aligning the boundary of the General residential zone with the cadastral boundary of the property will create a logical interface between zones. Extending the General residential zone to the western end of the site will create a corridor of urban development between the two existing urban areas of Maungatūroto. Several properties surrounding the site are proposed to be Rural lifestyle zone, this will create an appropriate buffer.
167.1	D King	General	Support	RETAIN any part of the Proposed District Plan that encourages growth in land available for housing-industry.	<ul style="list-style-type: none"> Submitter believes that the lack of land available for housing has been hindering Dargaville and the region to develop its potential and prosperity. Submitter also notes that a larger number base for rates would help provide more income for necessary upgrades for things such as water supply and footpaths.
168.1	M McDonald	General	Amend	ADD the existing regulations on Genetic Engineering and Genetically Modified Organisms into the Proposed District Plan.	<ul style="list-style-type: none"> The present regulations were developed over a long period in response to a number of things (refer to submission for details). Council also need to consider the change proposed by the Government's Gene Technology Bill.

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					<ul style="list-style-type: none"> • Submitter provides example of the United States of America and Multinational Chemical corporations such as Monsanto/Bayer who would "have a field day" in an unprotected New Zealand. • A mistake could destroy the natural environment of New Zealand and ecology is key to a healthy environment. • Kaipara's precautionary regulations could save New Zealand from destruction.
169.1	TMA Kapa	General	Oppose	No specific decision requested, but submitter opposes the Proposed District Plan until Kaipara District Council engage with Te Parawhau Hapu, other communities, and local government before decisions are made. Te Parawhau Hapu need to be supported by Council to address their objectives and underfunded struggles, otherwise inequities within the District will persist (inferred).	<ul style="list-style-type: none"> • A systematic dialogue regarding the necessity and potential of constitutional transformation within the context of the Te Parawhau Hapu's absence in the Kaipara District is imperative. Submitter considers that that both the Council and the District are more prepared than ever to engage with the Te Parawhau Hapu and explore the possibilities of a governance model that is conciliatory and consensual. Achieving this vision requires inclusive decision-making and law-making processes, alongside continuous dialogues with all communities in the Kaipara District to determine the form any new constitution should take. •
170.1	R & D McLachlan	Planning Maps	Oppose	AMEND the zoning of parts of Oneriri Road that are proposed as Rural lifestyle zone to the existing Rural zoning.	<ul style="list-style-type: none"> • Inconsistent with Rural lifestyle zone policy. • Oneriri Road is not close to a township and does not have good access to infrastructure and services. • The junction of Oneriri Road and State Highway 1 is dangerous. • Rezoning would increase property values and rates for existing residents. • Conflict with existing covenants. • Adds more supply unnecessarily to a low-demand area.
171.1	G Mather	General	Oppose	ADD the precautionary Genetic Engineering and Genetically Modified Organisms policies and rules that were in the Draft District Plan.	<ul style="list-style-type: none"> • The GE/GMO provisions will help protect our biosecurity and the environment. • The precautionary approach will avoid GM contamination that compromises valuable enterprises. • Adding back the provisions will provide coherent approach to this issue throughout Northland.
172.1	A Preston	Planning Maps	Amend	AMEND the zoning of properties in Insley and Moir Streets in Mangawhai (including 4 Insley Street) from Commercial zone to the status quo Residential zone unless clarity is provided on whether residential rates are still going to apply.	<ul style="list-style-type: none"> • The submitter is concerned with the possibility of rates increases to commercial rates if the properties' main use remains residential, and seeks further clarity/assurance on this matter. • The commercial split zoning proposed for the submitter's property at 4 Insley Street will create complications if a subdivision is sought. • The demand for commercial space in central Mangawhai Village has reduced with the new Mangawhai Central area.
172.2	A Preston	Strategic Direction	Amend	No specific decision requested, however the submission expresses concern that the Proposed District Plan makes no attempt to do what it can to enable or encourage serious reductions to our greenhouse gas emissions. It needs to ensure our systems and infrastructure are capable of continuing to function in the event of major disruption including the restrict of supply of petrol and diesel.	<ul style="list-style-type: none"> • Our civilisation is likely to be disrupted by changes in international geopolitical situations and advances in Artificial Intelligence, and we need to be cognisant of contingencies and our vulnerabilities.
172.3	A Preston	Transport	Amend	RETAIN TRAN-P2.11. AND No specific decision sought regarding TRAN-P2.12, but submission questions whether this clause equates to providing for more trucks.	<ul style="list-style-type: none"> • Roading infrastructure is a major cost to ratepayers and heavy vehicles cause the most damage to roads. Viable alternatives are needed to the imported fossil-fuel dependent transport system. • Acknowledges that roading infrastructure is essential but for our strategic security.
172.4	A Preston	Planning Maps	Amend	AMEND planning maps to zone areas alongside or near existing rail corridors to enable and encourage residential and	<ul style="list-style-type: none"> • The railway lines are strategically essential, and the plan shows a lack of foresight by not siting industrial or residential adjacent to the rail

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				industrial development, wherever possible and appropriate.	<ul style="list-style-type: none"> corridor or enabling access to future passenger stations. Rail transport provides for robustness and resilience, and contributes to emissions reductions.
172.5	A Preston	Transport	Amend	AMEND the Proposed District Plan to prevent any development that would preclude access to and use of the rail corridor, potential siting for rail-transport-related facilities, stations, carparks, loading zones etc.	<ul style="list-style-type: none"> Rail infrastructure is in place near Kaiwaka, Maungatūroto, Dargaville and Mangawhai. The railway infrastructure is strategically essential and provides for robustness, resilience and emissions reductions.
172.6	A Preston	General	Oppose	No specific decision requested, however the submission opposes any extension of the motorway through the Kaipara District.	<ul style="list-style-type: none"> The submitter considers there is a responsibility to transition away from fossil fuel dependency.
172.7	A Preston	Infrastructure	Amend	No specific decision sought, however the submission supports any activities which enable the development of the capability to generate renewable electricity.	<ul style="list-style-type: none"> We have a responsibility to reduce emissions.
172.8	A Preston	General	Amend	AMEND the Proposed District Plan to maintain a precautionary principle towards genetically modified organisms and genetic engineering.	<ul style="list-style-type: none"> Our primary producers depend on the perception that New Zealand is free from toxins and genetic modification.
172.9	A Preston	General	Amend	No specific decision requested, however the submission expresses concern that the North Auckland Railway Line and the Dargaville Branch Railway Lines are not defined on the Kaipara District Council maps and that the Proposed District Plan makes no mention of nor provision for Passenger rail despite our having the infrastructure in place within 2 kilometres of Kaiwaka , Maungatūroto and into the centre of Dargaville and 16 km west of Mangawhai.	<ul style="list-style-type: none"> The absence of any proposals to site industrial or residential zoning adjacent to the rail corridor at Kaiwaka nor to enhance access to sites where passenger stations c/should be constructed shows an institutional bias against rail transport and a total lack of foresight which is not consistent with stated aspirations about robustness and resilience through self-sustainability. It neglects our responsibility to be transitioning away from our burning of fossil fuels as per advice/warnings issued by the Intergovernmental Panel on Climate Change.
172.10	A Preston	General	Oppose	No specific decision sought, however the submission opposes any attempt to establish a waste to energy plant.	<ul style="list-style-type: none"> No reasons provided.
173.1	M Wilson	General	Amend	ADD precautionary and prohibitive Genetic Engineering /Genetically Modified Organisms provisions consistent with the Draft Kaipara District Plan, the Northland Regional Policy Statement , existing case law and the findings of the Northland/Auckland Inter Council Working Party.	<ul style="list-style-type: none"> For protection of biosecurity, ecology, environment, economy, farmers, food sovereignty and welfare. To fulfil its obligations to neighbouring councils, sustainable management of natural and physical resources and the direction of the Northland Regional Policy Statement and Regional Plan.
174.1	G & A Gore	Planning Maps	Amend	AMEND the planning maps to only zone Petley Road peninsula to Rural lifestyle zone after the establishment in the first instance of a sealed road and an appropriate State Highway intersection.	<ul style="list-style-type: none"> If the proposed zone changes to rural lifestyle, there will be increased traffic volume from the increase in housing density. It is essential that the roading infrastructure is upgraded prior to housing intensification. The road already suffers from poor condition, including corrugations, scouring, depressions, potholes and excessive dust. There are serious safety concerns around the intersection of Petley Road and the State Highway. It is an angled, dangerous intersection, with limited visibility, no pull-over lanes and large potholes to navigate. It is used for the school bus to turn around and many near-misses have been reported. It is responsibility of the Council to maintain the road, which it is not currently doing. This would be exacerbated by potentially more dwellings.
174.2	G & A Gore	Subdivision	Amend	AMEND the Rural lifestyle zone minimum lot size to 2ha	<ul style="list-style-type: none"> 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.
175.1	D Hastie	SCHED 4 - Outstanding Natural Features	Support	RETAIN ONF2 Bald Rock dacite dome in SCHED4 Outstanding Natural Features	<ul style="list-style-type: none"> Vulnerable iconic features that are covered in indigenous flora and fauna. Locals have spent years, and often at their own cost, eradicating noxious plants and animals. Recently we have seen the return of native birds tom tits and kaka.

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					<ul style="list-style-type: none"> Any disturbance to these environments will damage not only the features but all the hard work done by their neighbours.
175.2	D Hastie	SCHED 4 - Outstanding Natural Features	Support	RETAIN ONF23 Pukekaroro dacite dome, Kaiwaka in SCHED4 - Outstanding Natural Features.	<ul style="list-style-type: none"> Vulnerable iconic features that are covered in indigenous flora and fauna. Locals have spent years, and often at their own cost, eradicating noxious plants and animals. Recently we have seen the return of native birds tomtits and kaka. Any disturbance to these environments will damage not only the features but all the hard work done by their neighbours.
175.3	D Hastie	SCHED5 - Outstanding Natural Landscapes	Support	RETAIN ONL 15 Bald Rock in SCHED5 - Outstanding Natural Landscapes.	<ul style="list-style-type: none"> Vulnerable iconic features that are covered in indigenous flora and fauna. Locals have spent years, and often at their own cost, eradicating noxious plants and animals. Recently we have seen the return of native birds tomtits and kaka. Any disturbance to these environments will damage not only the features but all the hard work done by their neighbours.
175.4	D Hastie	Earthworks	Amend	ADD a rule to prevent new mines, quarries or their expansion be allowed within 700m of any significant feature or existing dwelling. The submission also makes reference to EW-O2 and EW-R4.	<ul style="list-style-type: none"> Personal experience of a quarry blast of Baldrock shook the house and cracks appeared in the walls. The extent of the disturbance must have affected Pukekaroro as well as Baldrock and possibly the pressurised pipeline alongside.
175.6	D Hastie	Natural Features and Landscapes	Support	RETAIN the non-complying activity status (or better) for NFL-R8.	<ul style="list-style-type: none"> Mining and quarrying in Overlay Significant areas do more harm than good. Flora and Fauna can never be 'reinstated' to their original form. The proposal from Baldrock owners to quarry this Outstanding Natural Feature is not for the benefit of Kaipara's infrastructure but to produce 'garden ornaments for the subdivision in Mangawhai'.
176.1	R Woolnough	General	Oppose	No specific decision requested, however the submission opposes the current restrictions on subdividing non-viable farmland in the Mangawhai area. The submission considers that it is unfair that small landowners face strict limitations on subdivision while large developers struggle to sell their lots. The market should be open and equitable for all landholders.	<ul style="list-style-type: none"> Large-scale subdivisions have already been approved, and the resulting oversupply is a consequence of those decisions. Concerns about infrastructure - such as roads and public facilities - will naturally be addressed as Mangawhai continues to grow. Population-driven demand will support the development of essential services over time.
176.2	R Woolnough	General	Oppose	No specific decision requested, however the submission considers that concerns about infrastructure such as roads and public facilities will naturally be addressed as Mangawhai continues to grow.	<ul style="list-style-type: none"> Population-driven demand will support the development of essential services over time.
177.1	Mangawhai Matters Inc	General	Amend	AMEND the Proposed Kaipara District Plan to achieve the relief sought in the submission (see other specific submission points).	<ul style="list-style-type: none"> See other submission points for specific reasons.
177.2	Mangawhai Matters Inc	Vision for Kaipara	Amend	AMEND the Vision for Kaipara section to include an objective to protect the natural environment. OR Any further, alternative or consequential amendments.	<ul style="list-style-type: none"> To protect the Mangawhai Estuary from sediment and sedimentation, and be consistent with the New Zealand Coastal Policy Statement.
177.3	Mangawhai Matters Inc	Definitions	Amend	ADD a definition for Sediment and Sediment Control Measures, as set out in the Resource Management Act definitions. OR Any further, alternative or consequential amendments.	<ul style="list-style-type: none"> To protect the Mangawhai Estuary from sediment and sedimentation, and be consistent with the New Zealand Coastal Policy Statement.
177.4	Mangawhai Matters Inc	Natural Hazards	Amend	AMEND the Natural Hazards section to include specific text about sedimentation. The paragraph headed "Land instability"	<ul style="list-style-type: none"> The objectives and policies of the Natural Hazards section focus on stormwater, overland flow and flooding, without mentioning the associated transport and deposit of sediments.

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				could be headed "Land instability and Sedimentation". AND ADD sediment and related controls to the relevant objectives and policies of the Natural Hazards section. OR Any further, alternative or consequential amendments.	The Mangawhai Estuary is vulnerable to this natural hazard.
177.5	Mangawhai Matters Inc	Planning Maps	Amend	ADD an Overlay map showing the Mangawhai Estuary catchment area at risk of producing sediments which can be transported by runoff from storm events after uncontrolled activity, development or siteworks occur within that land area. AND ADD associated subdivision and earthworks controls applying within the overlay. See submission attachments for details of the controls sought, which have been developed through Environment Court appeals to Private Plan Changes 83 and 84. OR Any further, alternative or consequential amendments.	<ul style="list-style-type: none"> 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.
177.6	Mangawhai Matters Inc	Subdivision	Amend	AMEND 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. OR Any further, alternative or consequential amendments.	<ul style="list-style-type: none"> 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.
177.7	Mangawhai Matters Inc	Earthworks	Amend	AMEND earthworks 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 AND AMEND standards and rules controlling sedimentation risks from public infrastructure including ditches, drains and roads that are within the Mangawhai Estuary Catchment Overlay mapped area, so that sediment discharges from such infrastructure are minimised. OR Any further, alternative or consequential amendments.	<ul style="list-style-type: none"> 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.
177.8	Mangawhai Matters Inc	Infrastructure	Amend	AMEND the public stormwater infrastructure provisions to ensure that public stormwater infrastructure including overland flow paths, drains, ditches and pipes cannot directly discharge stormwater flows into the Mangawhai Estuary/Harbour without sediment flows being mitigated by appropriate control measures such as sediment detention and retention devices. OR Any further, alternative or consequential amendments.	<ul style="list-style-type: none"> To protect the Mangawhai Estuary from sediment and sedimentation, and be consistent with the New Zealand Coastal Policy Statement.
177.9	Mangawhai Matters Inc	Planning Maps	Support	RETAIN overlays identifying areas of the district that already contain sufficient residentially zoned land and limiting any further zone changes, such as the Mangawhai/Hakaru Managed Growth Area. OR Any further, alternative or consequential amendments.	<ul style="list-style-type: none"> Kaipara, and Mangawhai in particular, already has sufficient land zoned for residential development anticipated in the next forty years.
178.1	Mangawhai Estates Partnership	General	Amend	Access to the Proposed District Plan needs to be made available in hard copy at all Council offices.	<ul style="list-style-type: none"> Some readers may not have competence with a screen.

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					<ul style="list-style-type: none"> Reduces access to the issues for many ratepayers.
178.2	Mangawhai Estates Partnership	General Rural Zone	Amend	AMEND the Proposed District Plan to create lifestyle lots; within clear criteria, rather than leaving room for intensive residential sites arising within a General rural zone.	<ul style="list-style-type: none"> The GRUZ-O1 has no relevance to 27.777ha of which 5.5ha is in active orchard use. The Area around Clarke Road has not had active milking sheds for years, remaining pasture is used as run off, supporting homes. Devich Road and Cames Road are examples. There needs to be provision for creation of lifestyle lots.
178.4	Mangawhai Estates Partnership	General	Amend	No specific decision sought; however, the submission considers Council has to clarify the plans for managing growth so that the community know what is appropriate and everybody sticks to them.	<ul style="list-style-type: none"> Houses have spread over farms, industrial workshops on main roads (such as Tomarata), intensive residential development next to gated communities. Council Plans need to be clarified and followed. Less complicated rules and more supervision is needed.
178.5	Mangawhai Estates Partnership	Planning Maps	Amend	<ul style="list-style-type: none"> No specific decision requested; however, the submission considers that the Proposed District Plan maps (including esplanade and flood) ignore the fact that Paul Road adjoins the orchard and there are issues to be addressed over upstream drain maintenance. The regular flooding of Clarke Road is not addressed. 	<ul style="list-style-type: none"> Submitter has land partly alongside Mangawhai estuary and Home Creek and has not been adversely affected by flood waters since they have owned it (44years)
178.6	Mangawhai Estates Partnership	Hazardous Substances	Oppose	No specific decision sought; however, the submission refers to HS-R3 and considers that multiple supervision of fertiliser in the General rural zone is a waste of money.	<ul style="list-style-type: none"> The HS-R3 rule referred to is justified in the Overview of Hazardous Substances as "the Plan has the supporting role of controlling the land use activities..." The category is limited to minor irritation. The farmer has record keeping obligations already imposed and supervised. Farmers producing food have controls from the Ministry exporter and customers, generally by Audit. Fertiliser is defined in the order and on the bag. Farmers are generally required to have a Growsafe certificate renewed regularly. There is neither time nor money for another inspector or inspection.
179.1	G Renall	Planning Maps	Amend	AMEND the zoning of part of the land at 144 Mangawhai Heads Road (Lot 3 DP 208703) from residential to commercial.	<ul style="list-style-type: none"> There is currently no commercial land available in that area. This would support the re-zoning of the rise that occurred in Plan Change 83.
180.1	L White	Planning Maps	Amend	AMEND the zoning for 37 Gorge Road, Maungatūroto, (Lot 9 DP 344966) from Rural lifestyle zone to General residential zone.	<ul style="list-style-type: none"> The land is flat and suitable for residential use. Planted trees are now mature The driveway has been formed to comply with residential requirements. Access is off Gorge Road which is a sealed road. There are no hazard overlays affecting the property. There are no environmental or historical cultural values affecting this request.
181.1	C & D Jukes	Planning Maps	Amend	AMEND the zoning for 58 Ngatoto Road (Lot 77 DP 16979) from General rural zone to Rural lifestyle zone.	<ul style="list-style-type: none"> The property has power, internet and a well-formed road. The property is well contoured to allow for 4000m sections.
182.1	N & T Mullinder	Planning Maps	Support	RETAIN the General residential zoning for 996 Pouto Road, Te Kopuru as notified.	<ul style="list-style-type: none"> The submitter states they have lived there for many years and believe the change would align with their future plans
183.1	S Vear	Planning Maps	Oppose	No specific decision sought, however the submission opposes the proposed zoning of Oneriri Road including Hinamoki Estate as Rural lifestyle zone.	<ul style="list-style-type: none"> Introduces a pocket of high-density housing in an established rural community. Poses environmental and Infrastructure risks.

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					<ul style="list-style-type: none"> Threatens the value and character of the area. Introducing intensification of development in this zone would erode its character. Fails to meet the criteria of being close to urban with access to services and transport networks. The area is 8/10 Km from Kaiwaka. There are access issues with a narrow winding road and a single lane bridge prone to flooding. The road has a hazardous intersection with SH1. The internal roads of Hinamoki estate were not made to accommodate increased housing density. Contradicts the Rural lifestyle zone objectives and policies. Threatens endangered life. Creates reverse sensitivity issues. Is disrespectful of the cultural and historical significance of the land.
184.1	T Rahm	Planning Maps	Oppose	No specific decision requested, however the submission opposes the zoning of Petley Peninsula.	<ul style="list-style-type: none"> The Land is prone to slipping and is very temperamental as it is in a high rain and wind zone. Missing basic infrastructure, the road is a dirt road at the moment and very badly maintained and after contacting council it does not look like it will be upgraded. More power supply as there are more property's (there are often power cuts because of poor tree and line maintenance). More people mean more domestic and farm animals, therefore more effluent in the ground and eventually in the harbour. More environmental pressure from more dwellings, septic tanks and overflowing water tanks. Lack of public transport. Lack of schooling and very limited educational opportunities for young people as there is no college and trade schools. Lack of basic medical care. Lack of shopping opportunities. There are existing places in the region which could be much easier developed with less cost and effort, such as the townships of Paparoa, Maungatūroto and Kaiwaka.
185.1	M Wood	SCHED1 - Historic Heritage Resources	Oppose	DELETE HH-DAR-24 the Former Jones/Atkinson cottage at 13 River Road, Mangawhare, Dargaville (Lot 1 DP 184825 5033068) B Historic Area 7002 from SCHED 1 Historic Heritage Resources.	<ul style="list-style-type: none"> The shed is not historical. The building is located in a flood zone and may need to be relocated. The property may be of greater value to someone who can remove the house and expand the shed. The submitter was informed by Council prior to purchasing the property that the house was not historical. There are many of these homes all over New Zealand and Australia and there is nothing particularly special about it.
186.1	Te Kopuru Historic Hospital Trust and Maungarongo Foundation Trust	SCHED1 - Historic Heritage Resources	Oppose	DELETE HH-TEK-08 Former Northern Wairoa Hospital buildings (hospital ward, isolation ward & maternity annexe) located at 72/76 Norton Street Te Kopuru (Part Allot 5 & Part Allot 143 Parish of Te Kopuru, Lot 2 DP 59668) from SCHED1 Historic Heritage Resources.	<ul style="list-style-type: none"> This site is privately owned and receives no funding or any support from any government or council body Significant alterations have been made to all of these buildings in the more than 50 years since the final closure of the Maternity ward in 1971. Most if not all of the original fixtures and fittings have been removed, structural alterations to internal walls, and the replacement, removal and or addition to plumbing and electrics. The buildings do not contain any equipment that reflect their former status as a hospital

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					<ul style="list-style-type: none"> Storms, miscreants and events like Cyclone Gabriel have taken a toll on all of them and toppled the District Memorial Flagpole. It has been mooted that it will take millions of dollars to renovate and restore this complex to a modern usable state which will not be government or ratepayer funded. Placing this on that list will not only add to the material costs due to the requirement for period parts and pieces to act as a museum. This will add a large number of costly fees to be paid for no gain when basic costs such as electricity and rates continue to rise exorbitantly. The Hospital represents one stage of history on a site that has hundreds of years of prior events and happenings attributed to it that is not mentioned in the report defining the buildings as historic. Its history and the story of Te Kopuru and the greater Wairoa are linked and you cannot have one without the other or cherry pick. This site has had many more meaningful events added to its story since it was a Hospital.
187.1	W Bryant	SCHED1 - Historic Heritage Resources	Oppose	DELETE HH-DAR-27 Former Jones House 23 River Road, Mangawhare, Dargaville Lot 1 DP 66149 4743668 A Historic Area 7002 from SCHED-1 Historic Heritage Resources.	<ul style="list-style-type: none"> The Resource Management Act 1991 puts no date on the identification of an historic heritage. The Heritage New Zealand Pouhere Taonga Act (which replaced the Historic Places Act 1993) was enacted. It gave its purpose as"to promote the identification, protection, preservation and conservation of the historical and cultural heritage of New Zealand" .This Act defines an archaeological site as any building or structure that "was associated with human activity that occurred before L900. . . ." . The home was built in 1905 The submitter and owner has maintained the house over the last 60 years without assistance. Many improvements have been made over the years. The submitter does not want the home made into a heritage house. The submitter considers that it is their home. Concerned that the scheduling amounts to foregoing rights of ownership. The description of the building and its history are incorrect including who designed the house and the ownership history.
188.1	Y Plummer	SCHED1 - Historic Heritage Resources	Oppose	DELETE HH-DAR-25 comprising the Former Jones / Ford cottage at 15 River Road, Mangawhare from SCHED1 .Historic Heritage Resources.	<ul style="list-style-type: none"> The submitter has undertaken many repairs to the house since occupying it a year ago. There is no intention to alter the house. A historic classification will make the house harder to sell. The submitter does not want to have to get permits for any work they want to do. The house was built between 1906 and 1915 so is not included in the pre1900s. The house is now within the flood zone so will not be protected by heritage status.
189.1	N Ward	General	Oppose	ALLOW rates for residential occupants of newly re-zoned industrial areas to remain the same.	<ul style="list-style-type: none"> An increase in rates could push occupants off their land.
189.2	N Ward	General	Amend	ENABLE residential use to be grandfathered and that this can be passed on to subsequent property owners if desired.	<ul style="list-style-type: none"> So existing owners are not put out of their land New purchaser of land can continue to live in it. .
189.3	N Ward	Noise	Support	ADD noise insulation requirements for businesses in newly established industrial zones	<ul style="list-style-type: none"> To keep noise down.
189.4	N Ward	General	Oppose	No specific decision requested, however the submission expresses concern with speed on SH14 (inferred) and Awakino East Road.	<ul style="list-style-type: none"> Too many drivers driving 140-150 in 100 kmph areas. Increased risk with having buildings and businesses on Awakino East Road.

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189.5	N Ward	Planning Maps	Oppose	No specific decision requested, however the submission expresses concern regarding the proposed Light industrial zone for the property at 5479 SH14, Awakino Point (inferred).	<ul style="list-style-type: none"> The rates will go to industrial. Devaluation of the property.
189.7	N Ward	General	Oppose	PROVIDE compensation if a rezoning to industrial devalues the home.	<ul style="list-style-type: none"> Concern that rezoning to industrial will devalue a valuable asset.
190.1	K Clarke	Planning Maps	Oppose	AMEND the extent of Commercial Zone on Ripiro Drive and Seaview Road at Baylys Beach, to reduce the Commercial zone to one each side of 22 Ripiro Drive.	<ul style="list-style-type: none"> There is low demand for commercial zoning in this location. Baylys Beach is only 10 minutes to Dargaville, therefore there is no need for the proposed Commercial zoning.
190.2	K Clarke	Planning Maps	Oppose	AMEND the zoning of the additional General residential zone of the large lots north and south of the existing Baylys Beach settlement to General rural zone (inferred).	<ul style="list-style-type: none"> It is unnecessary for this area to be zoned for General residential and there are already unsold sections in the Sunset Drive subdivision. Infrastructure needs to be developed first as it is already inadequate for local needs.
191.1	M Ormerod	SCHED1 - Historic Heritage Resources	Oppose	DELETE HH-DAR-23 Former Jones/Lodge cottage at 11 River Road, Mangawhare from SCHED1 Historic Heritage Resources.	<ul style="list-style-type: none"> The photographs are outdated. The site was constructed in 1905 and therefore falls outside the requirement for properties that can be included in the Historic Places Trust register which requires historic places to be constructed prior to 1900. Double glazing would be desirable for thermal and noise insulation, but the submitter doubts this would be permitted under any Category B building. The submitter considers that the cottages were not 'top of the range' construction and the windows do not contain scribing which they consider would have been a normal building requirement, even in 1905. The property was 'derelict' when the submitter purchased it in 2017 and has spent time and money making the property habitable again. They are concerned what could happen if the property is put into SCHED1 Category. River Road is subject to a lot of heavy trucking movements which the submitters considers was likely not imagined by Mr Jones when he constructed the houses.
192.1	I & A Tiller	General		AMEND the status of Segeden Road to be re-gazetted as a "paper road" or at least the status of an unformed road.	<ul style="list-style-type: none"> The road is an access way, which used to be an unformed road but has since been closed as a road by Kaipara District Council. Access to the Pouto Peninsular could be cut off if the Northern Wairoa River washes away the Mt. Wesley Corner. Therefore, re-instating the status of Segeden Road as an unformed road would enable the Council to use the road if alternative access is closed. Re-gazetting the road would be facing up to reality in a positive way.
193.1	Chases Gorge Camp Club	General Residential Zone	Amend	AMEND the provisions in the Proposed District Plan to re-instate the Operative District Plan exemptions in the Residential and Transport sections for the Chases Gorge Camp Club, Ripiro Beach.	<ul style="list-style-type: none"> The exemptions for Chases Gorge Camp Club have been in place for many decades and previous versions of the district plan. This plan does not allow continuation of density provisions for the Chases Gorge Camp Club land. The Club has held a building site in reserve for decades, which has been recognised in previous plans, the submitter considers this should be included in the Proposed District Plan.
193.3	Chases Gorge Camp Club	Planning Maps	Oppose	DELETE the future growth area Northern Side (Gillespie's Farm) unless appropriate stormwater mitigation measures and associated rules are included in the Proposed District Plan.	<ul style="list-style-type: none"> All stormwater at this site must drain to the adjacent valley and then to the beach. The valley already has a large catchment and there has been significant planning over recent years to attempt to manage stormwater flows to the beach. The stream from this valley go through the middle of the submitter's land. The stream has a history of major stormwater events that have impacted on the submitter's land and the road. Therefore, the submitter considers that stormwater mitigation measures must be determine and built into the Plan rules, particularly for the General Residential zoned portion of Gillespie's Farm.

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193.5	Chases Gorge Camp Club	Natural Features and Landscapes	Support	RETAIN the Outstanding Landscape Area and Outstanding Natural Feature overlays over Ripiro Beach.	<ul style="list-style-type: none"> No specific reasons provided.
193.6	Chases Gorge Camp Club	Natural Features and Landscapes	Amend	No specific decision requested, however the submitter raises concerns as to how a major structure was allowed to be constructed within the Outstanding Landscape Area / Outstanding Natural Feature overlays near the Chases Gorge Camp Club, Ripiro Beach without public notification or communication and with major landscape impact for users, visitors and the view of Club houses.	<ul style="list-style-type: none"> No reasons provided.
193.7	Chases Gorge Camp Club	Natural Hazards	Oppose	No specific decision requested, however the submission opposes the scope and extent of natural hazards as they relate to Chases Gorge Camp Club land, including all rules under the Natural Hazards section that limit what building/alterations/additions can be carried out as a permitted activity.	<ul style="list-style-type: none"> No reasons provided.
193.8	Chases Gorge Camp Club	Definitions	Oppose	No specific decision requested, however the submission opposes all defined terms in the Natural Hazards section.	<ul style="list-style-type: none"> No reasons provided.
193.9	Chases Gorge Camp Club	General Residential Zone	Oppose	AMEND GRZ-S9 so that it does not apply to the Chases Gorge Camp Club properties.	<ul style="list-style-type: none"> Submitter opposes the standard as it would potentially impact on existing houses at the Chases Gorge Camp Club site.
194.1	R Mueller-Glodde	General	Amend	ADD the precautionary and prohibitive Genetic Engineering / Genetically Modified Organisms provisions, policies, and rules into the Proposed District Plan consistent with the Draft District Plan, the findings of the Northland/Auckland ICWP on GMOs, and the Northland Regional Policy Statement direction on Genetically Modified Organisms.	<ul style="list-style-type: none"> Omitting the GE/GMO provisions from the Proposed District Plan goes against the wishes and feedback from the community. Kaipara District Council (KDC) is required to be in compliance with the Northland Regional Council Operative Regional Plan and Regional Policy Statement. The provisions should be in alignment with the GE/GMO provisions that Whangarei District Council, Far North District Council, Northland Regional Council, and Auckland Council have already achieved in their District Plans. KDC should act on their obligations as a formative member of the "Inter Council Working Party on GMO Risk Evaluation and Management Options" irrespective of any controversial proposals for legislative change. The provisions will ensure that the District's biosecurity, wider environment, economy, valuable "Northland, naturally" brand, existing GM free farmers/primary producers, food sovereignty, and the ability of Kaipara residents to grow and eat GM free food are protected. KDC should act in keeping with case law (the findings of the Northland / Auckland ICWP on GMOs) and the wishes of local ratepayers and residents. Outdoor GE/GMOs do not respect boundaries - Farmers/landowners and their valuable enterprises need protection. KDC should support the GE/GMO policies of various Tai Tokerau Iwi for their respective rohe.
195.1	S Millard	Planning Maps	Oppose	AMEND the zoning of parts of Oneriri Road, including Takahoa Bay and Hinamoki Estates from Rural lifestyle zone to the existing Rural zone as per the Operative District Plan.	<ul style="list-style-type: none"> The change would allow the minimum lot size to reduce from 12 hectares to 0.4 hectares thereby introducing high-density housing into an area intentionally developed for low-density rural living. The submitter notes that they intentionally choose to live in this District for the quiet rural lifestyle and the proposed change would affect this greatly. The change is inconsistent with Rural lifestyle zone policy Environmental and ecological risks - Rezoning threatens sensitive wildlife and the Kaipara Harbour. Inadequate infrastructure for high-density development. Reverse sensitivity and rural incompatibility.

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					<ul style="list-style-type: none"> • Planning integrity and precedent • It disrespects the cultural, historical and archaeological significance of Takahoa Bay and Hinamoki. • Conflict with society rules and unjustified rates impact. • Contradiction of Kaipara District Councils climate strategy and climate resilience principles.
196.1	I Bremer	General	Amend	ADD the Genetic Engineering / Genetically Modified Organism provisions consistent with the Draft District Plan.	<ul style="list-style-type: none"> • Council should keep its promises about managing GMO risks, regardless of laws being brought in at a National level. • Rules need to protect local farmland, environment, and food from GMOs which can spread by wind, water animals, or mistakes • GMOs go beyond property boundaries, risking contamination for farmers and animals. • The council should support the wishes of local Māori tribes who want to stay GMO-free. • Protecting the Kaipara District from GMO experiments is important for keeping our water, soil, and food safe.
197.1	Raupo Drainage Committee	Natural Hazards	Oppose	AMEND the assessment criteria for High Risk Hazard Areas after revising the methodology used to identify High Risk Hazard Areas. AND AMEND the spatial extent of High Risk Hazard Areas in Ruawai in accordance with revised methodology for flood modelling.	<ul style="list-style-type: none"> • The submitter considers that the assessment criteria for the threshold for high risk hazard areas if flawed. The submitter also outlines that the Coastal Flood Hazard Zone modelling for Ruawai is based on the region wide model and is not reflective of the risk to Ruawai. They note that the modelling methodology was recognised to be flawed by Northland Regional Council. This inaccuracy of the modelling has significant detrimental effects on a number of Ruawai properties and a significant number of properties are incorrectly affected by High Risk Hazard area overlay mapping.
197.2	Raupo Drainage Committee	Natural Hazards	Support	RETAIN NH-P1. AND Submitter raises concerns that the policy is not yet achieved due to concerns raised about the flood modelling for Ruawai.	<ul style="list-style-type: none"> • Submitter supports the policy and considers it commendable, but is concerned that it is not yet achieved. • The Pluvial/Fluvial flood model for Ruawai was commissioned by Northland Regional Council following significant push back by the Raupo Drainage Committee. The submitter notes it is a significant planning tool if available in its entirety but Northland Regional Council have only released flood extent models.
197.3	Raupo Drainage Committee	Natural Hazards	Amend	No specific decision requested; however the submission considers that NH-R4 effectively prohibits any further development in Ruawai and surrounds. The flooding in Ruawai is pluvial, and in 1% annual exceedance events vast areas have no flooding or minor flooding of 100mm or less. AND AMEND the rules in the Proposed District Plan to recognise that Ruawai has an engineered flood plain and unique flood infrastructure.	<ul style="list-style-type: none"> • The submitter opposes NH-R4 as it effectively prohibits any further development in Ruawai and surrounds. The Raupo Drainage District is an Engineered Flood Plain and the flood risk to Ruawai is much maligned and misunderstood. It has flood infrastructure that is 'second to none' in the District that is unique in design and management structure. The submitter considers this needs to be recognised within the rules of the Proposed District Plan. As proposed, the Proposed District Plan groups the properties of Ruawai with those located in active floodplains where there is little to no flood infrastructure. The Raupo Drainage District needs to be recognised in the rules so that informed risk-based assessment can be on development proposals in the area.
198.1	R McInnes	Planning Maps	Support	RETAIN the rezoning from Rural zone to Rural lifestyle zone for parts of Pahi Road.	<ul style="list-style-type: none"> • The change from Rural to Rural lifestyle zoning reflects the actual use and character of the area and supports a vision that is more aligned with how many families wish to live and contribute in Kaipara. • The submitter's parents recently explored the possibility of subdividing previously but could not, due to the costs and requirements increasing significantly, making the process financially unviable. The submitter is hopeful that the Rural lifestyle zoning will help to unlock opportunities to convert the land to lifestyle use. • The submitter has strong ties to the place, and considers that the Rural lifestyle zoning may enable them to return to the area.

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					<ul style="list-style-type: none"> There is value in people with professional expertise being able to live and work in the communities they care about.
198.2	R McInnes	Subdivision	Support	<p>RETAIN the policies and rules relating to subdivision in the Rural lifestyle zone</p> <p>AND</p> <p>ENSURE that subdivision is not only allowed under the Proposed District Plan but is also practically and financially achievable.</p>	<ul style="list-style-type: none"> 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.
199.1	Broughton Family Trust	SCHED1 - Historic Heritage Resources	Oppose	<p>DELETE HH-MAU-10 being the Former Courthouse at 62 Hurdall Street, Maungatūroto from SCHED-1 - Historic Heritage Resources.</p> <p>OR</p> <p>AMEND the protection to only apply to the exterior facade and original bank-vault room, and classify all other interior work, routine maintenance and driveway realignment as permitted activities if the property remains scheduled.</p> <p>AND</p> <p>PROVIDE offsetting measures such as automatic fee waivers, funded heritage grants, or rates remission so that owners are not penalised for conserving a public benefit.</p>	<ul style="list-style-type: none"> The property does not have existing statutory protection under the Operative District Plan or the New Zealand Heritage List. The property has proven investment and is in good condition, and the owners have brought the property to a higher standard than when purchased. The owner has road-safety and access upgrades underway. Additional heritage consents would delay the essential safety work. Out-of-date evidence and photos for the site. The repairs trigger is disproportionate for routine repairs - and was acknowledged as an error in the Proposed District Plan that could be removed. No effective incentives exist. Discouraging willing custodians is counterproductive. Section 32 proportionality test is not met.
200.1	Broughton Family Trust	Planning Maps	Oppose	<p>AMEND the Light industrial zoning of 1060 State Highway 12, Maungatūroto to a residential serviced or large-lot residential zone but not medium-density residential (inferred) at least until the site can connect to a public wastewater network or until a comprehensive wastewater upgrade, consented by all co-owners of the site demonstrates capacity for cumulative loading.</p>	<ul style="list-style-type: none"> A residential-serviced or large-lot residential zone is the only zone that aligns with the Plan's strategic objectives. The Light industrial zone would frustrate, rather than advance the outcomes sought by LIZ-P1 (refer to submission for detailed assessment of the existing site against the outcomes sought by LIZ-P1). The Site is fragmented, residential/heritage in character, unserviced for trade waste, and surrounded by sensitive receivers meaning it is unsuitable for Light Industrial zoning. The cross-lease site includes mixed on-site wastewater servicing - Higher density risks overloading communal septic and undermining heritage cottages. Loss of existing residential and papakāinga rights. Fragmented titles and unanimous-consent barrier under the site's cross lease requirements. Residential-scale infrastructure - upgrading infrastructure of these sites would impose disproportionate costs on existing owners. Council spatial-plan evidence of servicing constraints - The Maungatūroto Spatial Plan identifies the need for staged wastewater upgrades before further growth and rezoning. LIZ-R16 would render residential activities non-complying removing present rights such as visitor accommodation and papakainga housing. The cross lease requires agreement from 11 owners, meaning that the site cannot realistically deliver the industrial-land supply objectives of the Light industrial or Commercial zone.
200.2	Broughton Family Trust	General Residential Zone	Oppose	<p>No specific decision requested, however the submission opposes a Medium-Density residential minimum lot size of 400m².</p>	<ul style="list-style-type: none"> 400m² standard enables more dwellings than current infrastructure can sustain. Cross-lease complexity and mixed servicing of the submitter's site. On-site wastewater capacity already stretched.

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					<ul style="list-style-type: none"> • Historic heritage on the site at risk. • Loss of existing residential and papakāinga rights. • Fragmented titles and unanimous-consent barrier under the site's cross lease requirements. • Residential-scale infrastructure - upgrading infrastructure of these sites would impose disproportionate costs on existing owners. • Council spatial-plan evidence of servicing constraints - The Maungatūroto Spatial Plan identifies the need for staged wastewater upgrades before further growth and rezoning.
200.3	Broughton Family Trust	Subdivision	Amend	AMEND 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"> • Cross-lease complexity and mixed servicing of the submitter's site. • On-site wastewater capacity already stretched. • Historic heritage on the site at risk. • Loss of existing residential and papakāinga rights. • Fragmented titles and unanimous-consent barrier under the site's cross lease requirements. • Residential-scale infrastructure - upgrading infrastructure of these sites would impose disproportionate costs on existing owners. • Council spatial-plan evidence of servicing constraints - The Maungatūroto Spatial Plan identifies the need for staged wastewater upgrades before further growth and rezoning.