

## 12. Supplementary Item on Further Submissions to the Proposed Regional Policy Statement

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**Reporting officer** Paul Waanders (Manager Policy and Monitoring)

**Date of meeting** 27 February 2013

### ***Vision, mission and values***

*This item is in accord with Council's vision, mission and values statement as the Regional Policy Statement (RPS) has to be given effect to in the District Plan and therefore plays a pivotal role in meeting the current and future needs of communities for good quality local infrastructure, local public services and performance of regulatory functions in a way that is most cost-effective for households and businesses. The RPS should build the relationship between the management of natural and physical resources and how that is provided for on the ground through the District Plan. Integrating all planning will assist the customers but that can only happen with innovative actions and creativity. Achieving the best outcome will be by valuing the inputs from all partners including the Northland Regional Council (NRC) and Whangarei District Council (WDC).*

### **Proposed Regional Policy Statement**

1. The Northland Regional Council (NRC) released a discussion document regarding the issues and options for Northland in late 2010. Simultaneously the required survey of the effectiveness and efficiency of the RPS was released.
2. The Draft New Regional Policy statement was released on 20 October 2011 and through presentations and discussions the Whangarei District Council (WDC) views were formulated which lead to the decisions under item 4 of the District Living Committee meeting dated 14 December 2011.
3. During the following 10 months, the staff and the Regional Policy and Development Committee of the NRC, with representatives of the Territorial Authorities (Cr John Williamson) and with inputs from a Technical Steering Committee compiled the Proposed Regional Policy Statement.
4. The Regional Council also conducted a mapping program to determine the coastal environment, identified the outstanding natural landscape and features and identified and described the natural coastal character for the whole of Northland with notification of affected parties.
5. The Proposed Regional Policy Statement for Northland was notified on 8 October 2012 for submissions closing on 3 December 2012. Council submitted a comprehensive submission consisting of 3 parts:
  - Part 1 deals with matters that have not been included but need to be recognised or provided for in the RPS;
  - Part 2 deals with the Submissions on the content of the RPS in the order as they appear in the Proposed RPS; and
  - Part 3 is Appendix 1 dealing with the Management of Genetically Modified Organisms in the Environment.
6. The submission was adopted under item 7 of the Whangarei District Council meeting of 28 November 2012, submitted to the Regional Council on 28 November 2012.
7. The Proposed Regional Policy Statement for Northland has been notified for further submission, with the submission period closing 1 March 2013.

## Further Submissions

1. The recommended further submissions have been focused:
  - To only those key matters where WDC made submissions and relief sought by other submitters could have significant effects.
  - Where relief sought by submitters could result in significant resourcing and financial implications for Council.
  - Matters in which Council did not make a submission, but where relief sought could result in significant consequences for the District.
2. Further submissions are detailed in Attachment 1.

## Recommendation

1. That the report and attachments are received.
2. That the documents made available be acknowledged.
3. That the further submissions on the Proposed Regional Policy Statement for Northland as contained in Attachment 1 be adopted and sent to the Northland Regional Council.
4. That staff be delegated to finalise the administrative process.
5. That staff be delegated to attend pre-hearing meetings (if any) and present submissions at a hearing.

## Attachments

1. [Copy of further submissions to the Proposed Regional Policy Statement for Northland.](#)

## Tabled Attachments (Contact Senior Meeting Coordinator)

1. Summary of submissions to the Proposed Regional Policy Statement for Northland by topic.
2. Summary of submissions to the Proposed Regional Policy Statement for Northland by submitter.
3. Full submissions on those matters that Whangarei District Council makes further submissions.

### Your Further Submission(s)

Please use the table below to indicate the submissions (or parts of submissions) that you support or oppose. Two examples are provided. For handwritten submissions, please attach additional pages as necessary. For electronic submissions, the rows will automatically expand to fit. Additional rows can be added at the end by using the "Tab" on your keyboard.

Submitter Name	Submitter number	Reference number(s)	Support/ Oppose	Reason for support/opposition (State the reason for your views)
Director General of Conservation	568	2	Support in part	<b>Support relief sought to 1.3.2 Economy within the Environment</b>  The submitter has sought an amendment that includes a reference to ecosystem services within the principle, as the provisions of ecosystem services is an important component of well-being. WDC supports this amendment in part as it is similar to the position held by Whangarei District Council.
Federated Farmers of New Zealand	746	22	Oppose	<b>Oppose relief sought to 1.3.8 Effectiveness</b>  The submitter seeks to retain a reference to "minimum regulation". WDC opposes the retention of this reference as this is inconsistent with Policy 6.1.1.1 and provisions relating to S.32 of the Resource Management Act.
Clarkson, D	337	4	Oppose in part	<b>Oppose in part relief sought to 2.1 Fresh and Coastal Water</b>  The submitter seeks to include text relating to hard rock mining in an issue relating to fresh and coastal water. WDC opposes the specific inclusion as the submitter is making specific reference to a particular activity rather than issues at a more general level. There may be grounds for including such a modified reference in the explanatory text.
Grammer, Z and Family	662	11	Oppose in part	<b>Oppose in part relief sought to 2.1 Fresh and Coastal Water</b>  The submitter seeks to include text relating to hard rock mining in an issue relating to fresh and coastal water. WDC opposes in part the specific inclusion as the submitter is making specific reference to a particular activity rather than issues at a more general level. There may be grounds for including such a modified reference in the explanatory text.
Royal Forest and Bird Protection Society of New Zealand Inc	284	3	Oppose in part	<b>Oppose in part relief sought to 2.1 Fresh and Coastal Water</b>  The submitter seeks to include text relating to hard rock mining in an issue relating to fresh and coastal water. WDC opposes in part the specific inclusion as the submitter is making specific reference to a particular activity rather than issues at a more general level. There may be grounds for including such a modified reference in the explanatory text.

Minewatch	687	7	Oppose	<p><b>Oppose relief sought to 2.3 Economic Wellbeing</b></p> <p>The submitter opposes all hard rock mining in Northland and seeks to prohibit activities within a two year timeframe once the RPS becomes operative. Whilst there may be situations in which hard rock mining is prohibited in a specific location in Northland, a blanket policy is not appropriate. In addition, two years is a very tight timeframe to address the relief sought and it is not realistic for territorial authorities to meet this timeframe.</p>
Northland Urban Rural Issue	789	3	Oppose	<p><b>Oppose relief sought to 2.5 Issues of Significance to Tangata Whenua – participation in resource management.</b></p> <p>WDC opposes the relief sought as this would append the Iwi Management Plans directly to the Regional Policy Statement. This would have the effect of elevating the status of Iwi Management Plans above what is in the Act.</p>
Ngunguru Marae Whanau	786	1	Support in part	<p><b>Support in part relief sought in 2.6 Issues of Significance to Tangata Whenua</b></p> <p>WDC supports in part the relief sought by the submitter. WDC is currently participating in a Sites of Significance programme in partnership with a number of Iwi and Hapu, and would like to extend the programme further.</p>
Ngatiwai Trust Board	632	13	Oppose in part	<p><b>Oppose in part relief sought to 3 Objectives – General</b></p> <p>WDC opposes in part the relief sought by the submitter as it is unclear how such management would occur. Fisheries resources are managed by the Crown rather than local authorities. Whilst local authorities have a role in ensuring that land-sourced contaminants and coastal activities do not have a significant impact on fishery stocks, the submission implies a greater role than intended by the Crown.</p>
Te Runanga A Iwi O Ngapuhi	697	13	Oppose in part	<p><b>Oppose in part relief sought to 3 Objectives – General</b></p> <p>WDC opposes in part the relief sought by the submitter as it is unclear how such management would occur. Fisheries resources are managed by the Crown rather than local authorities. Whilst local authorities have a role in ensuring that land-sourced contaminants and coastal activities do not have a significant impact on fishery stocks, the submission implies a greater role than intended by the Crown.</p>
Te Runanga Nui Te Aupori	654	2	Oppose in part	<p><b>Oppose in part relief sought to 3 Objectives – General</b></p> <p>WDC opposes in part the relief sought by the submitter as it is unclear how such management would occur. Fisheries resources are managed by the Crown rather than local authorities. Whilst local authorities have a role in ensuring that land-sourced contaminants and coastal</p>

				activities do not have a significant impact on fishery stocks, the submission implies a greater role than intended by the Crown.
Te Runanga o Ngati Whatua	812	13	Oppose in part	<p><b>Oppose in part relief sought to 3 Objectives – General</b></p> <p>WDC opposes in part the relief sought by the submitter as it is unclear how such management would occur. Fisheries resources are managed by the Crown rather than local authorities. Whilst local authorities have a role in ensuring that land-sourced contaminants and coastal activities do not have a significant impact on fishery stocks, the submission implies a greater role than intended by the Crown.</p>
Te Runanga o Te Rarawa	839	2	Oppose in part	<p><b>Oppose in part relief sought to 3 Objectives – General</b></p> <p>WDC opposes in part the relief sought by the submitter as it is unclear how such management would occur. Fisheries resources are managed by the Crown rather than local authorities. Whilst local authorities have a role in ensuring that land-sourced contaminants and coastal activities do not have a significant impact on fishery stocks, the submission implies a greater role than intended by the Crown.</p>
Director General of Conservation	568	13	Support in part	<p><b>Support in part relief sought to 3.6 Enabling Economic Wellbeing</b></p> <p>The submitter has sought an amendment that seeks to include reference to ecosystem services within the principle. This is similar to the position held by Whangarei District Council who have proposed a similar approach and acknowledgement of ecosystem services.</p>
Horticulture New Zealand and Northland Horticultural Forum	830	16	Oppose in part	<p><b>Oppose in part relief sought to 3.12 Regional Form</b></p> <p>WDC opposes the relief sought by the submitter as the proposed insertion/amendment is overly strong and prescriptive, given that all adverse impacts are to be avoided. Regional Form is not just concerned with urban issues but is concerned with the patterns of development and infrastructure across the district as a whole, including rural areas and communities.</p>
Te Runanga A Iwi O Ngapuhi	697	14	Oppose	<p><b>Oppose relief sought to 4 Water, Land and Common Resources</b></p> <p>WDC opposes in part the relief sought by the submitter as it is unclear how such management would occur. Fisheries resources are managed by the Crown rather than local authorities. Whilst local authorities have a role in ensuring that land-sourced contaminants and coastal activities do not have a significant impact on fishery stocks, the submission implies a greater role than intended by the Crown.</p>

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Zodiac Holdings Limited	563	5	Oppose	<p><b>Oppose relief sought to 4.2 Freshwater Objectives, Limits and Targets</b></p> <p>WDC opposes the relief sought by the submitter as the submission implies that highest economic benefit should be the main method of prioritisation. WDC position is that any water allocation process should include a number of parameters including social, environmental, cultural and economic. Additionally, the use of the phrase 'highest economic benefit' can also be interpreted in a number of ways, depending on its measurement, whether locally, regionally or nationally.</p>
Environmental Defence Society	360	21	Oppose in part	<p><b>Oppose in part relief sought to 4.2.3 Method – Statutory Plans and Strategies</b></p> <p>WDC oppose the relief sought by the submitter as twelve months is a completely unrealistic timeframe to address 1(a) &amp; 1(b).</p>
Federated Farmers of New Zealand	746	58	Oppose	<p><b>Oppose relief sought to 4.3.2 Statutory Plans and Strategies</b></p> <p>WDC opposes the relief sought by submitter as esplanade reserves may be set aside for a variety of purposes, apart from public demand for access. The Act (S229) notes a number of purposes including the natural functioning of the adjacent sea, river, or lake, maintaining or enhancing water quality, maintaining or enhancing aquatic habitats and other provisions.</p>
Horticulture New Zealand and Northland Horticultural Forum	830	35	Oppose	<p><b>Oppose relief sought to 4.3.2 Statutory Plans and Strategies</b></p> <p>WDC opposes the relief sought as the submitter seeks to include a definition around land use changes and intensification. Nitrogen is not the only form of land use change and intensification and therefore this meaning will often be inappropriate. Should a definition be prepared, a</p>

				number of stakeholders would need to be apart of the process.
Minewatch	687	16	Oppose	<p><b>Oppose relief sought to 4.3.3 Method – Advocacy and Education</b></p> <p>WDC opposes the relief sought by the submitter who seeks to remove reference to water quality trading and offset initiatives. WDC believe that water quality trading and offset initiatives may form a part of future management approach and inclusion of them in the proposed RPS is an appropriate response.</p>
Zodiac Holdings Limited	563	7	Oppose	<p><b>Oppose relief sought to 4.4.2 Policy – Avoiding and Phasing Out Over-Allocation and Requiring Efficiencies</b></p> <p>WDC opposes the relief sought as the submitter seeks to elevate economic benefit above other uses of water in catchment where competition exists for consumptive uses of water. Given that most catchments in Northland currently face some level of competition for consumptive uses, this amendment would effectively prioritise economic benefit about other aspects around water quantity.</p>
Horticulture New Zealand and Northland Horticultural Forum	830	45	Oppose	<p><b>Oppose relief sought to 4.4.5 Method – Statutory Plans and Strategies</b></p> <p>WDC opposes the relief sought as the submitter seeks to remove WDC capacity to plan for the distribution of water to a growing population. Municipal supplies benefit a large portion of Northland population, and needs to be responsive to changing environment conditions, and should be elevated above some applications for water take.</p>
Horticulture New Zealand and Northland Horticultural Forum	830	53	Oppose	<p><b>Oppose relief sought to 4.5.1 Policy – Protecting Significant Ecological Areas and Species</b></p> <p>WDC opposes the relief sought as the submitter seeks to remove reference to indigenous biodiversity that is not significant under 6(c) of the Act. However, such indigenous biodiversity may be important for fulfilling a range of other functions such as water quality, intrinsic values 7 (d), and providing for life-supporting capacity (section 5). Therefore WDC seek to retain 4.5.1 (2) albeit with a number of other amendments in terms of outlining what is considered to be an adverse effect and other changes.</p>
J L Hayes and Sons Limited	762	10	Oppose	<p><b>Oppose relief sought to 4.5.1 Policy – Protecting Significant Ecological Areas and Species</b></p> <p>WDC opposes the relief sought as the submitter seeks to remove reference to indigenous biodiversity that is not significant under 6(c) of the Act. However, such indigenous biodiversity may be important for fulfilling a range of other functions such as water quality, intrinsic values 7 (d), and providing for life-supporting capacity (section 5). Therefore WDC seek to retain 4.5.1 (2)</p>

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Top Energy Ltd	575	15	Oppose	<p><b>Oppose relief sought to 4.5.1 Policy – Protecting Significant Ecological Areas and Species</b></p> <p>WDC opposes the relief sought as the submitter seeks to reduce the two tiered approach to the management of indigenous biodiversity. However, having a two tier approach is important as it allows more flexibility in management. Both tiers of indigenous biodiversity may be important for fulfilling a range of other functions such as water quality, intrinsic values 7 (d), and providing for life-supporting capacity (section 5). Therefore WDC seek to retain 4.5.1 (2) albeit with a number of other amendments in terms of outlining what is considered to be an adverse effect and other changes.</p>
Trustpower Ltd	539	13	Oppose	<p><b>Oppose relief sought to 4.5.1 Policy – Protecting Significant Ecological Areas and Species</b></p> <p>WDC opposes the relief sought as the submitter seeks to reduce the two tiered approach to the management of indigenous biodiversity. However, having a two tier approach is important as it allow more flexibility in management. Both tiers of indigenous biodiversity may be important for fulfilling a range of other functions such as water quality, intrinsic values 7 (d), and providing for life-supporting capacity (section 5). Therefore WDC seek to retain 4.5.1 (2) albeit with a number of other amendments in terms of outlining what is considered to be an adverse effect and other changes.</p>
Buckley, D	597	8	Oppose	<p><b>Oppose relief sought to 4.5.3 Policy – Supporting Restoration and Enhancement</b></p> <p>WDC opposes the relief sought by the submitter who seeks to remove reference to (biodiversity) offset initiatives. WDC believe that offset initiatives provide flexibility and will form a part of future management approach. Inclusion of them in the RPS is appropriate.</p>
Conning, L	342	40	Oppose	<p><b>Oppose relief sought to 4.5.3 Policy – Supporting Restoration and Enhancement</b></p> <p>WDC opposes the relief sought by the submitter who seeks to remove reference to (biodiversity) offset initiatives. WDC believe that offset initiatives provide flexibility and will form a part of future management approach. Inclusion of them in the RPS is appropriate.</p>
Environmental Defence Society	360	36	Oppose	<p><b>Oppose relief sought to 4.5.4 Method – Statutory Plans and strategies</b></p> <p>WDC opposes the relief sought as the submitter seeks that all indigenous biodiversity in managed at the regional level. This is inappropriate as a number of activities in regard to indigenous biodiversity are best managed at a local level.</p>



Federated Farmers of New Zealand	746	69	Oppose	<p><b>Oppose relief sought to 4.5.4 Method – Statutory Plans and Strategies</b></p> <p>WDC opposes the relief sought as the submitter seeks to remove reference to “unreasonably” in the provision, due to the submitter regarding it as being too vague. However, rather than being vague, WDC considers that the terminology provides an appropriate test and limitations for the development of provisions.</p>
Lourie, D	289	17	Oppose	<p><b>Oppose relief sought to 4.5.4 Method – Statutory Plans and Strategies</b></p> <p>WDC opposes the relief sought by the submitter who seeks to remove reference to (biodiversity) offset initiatives. WDC believe that that offset initiatives provide flexibility and will form a part of future management approach. Inclusion of them in the RPS is appropriate.</p>
Stump, G	319	5	Oppose	<p><b>Oppose relief sought to 4.5.4 Method – Statutory Plans and Strategies</b></p> <p>WDC opposes the relief sought by the submitter who seeks to remove reference to (biodiversity) offset initiatives. WDC believe that that offset initiatives provide flexibility and will form a part of future management approach. Inclusion of them in the RPS is appropriate.</p>
Egg Producers Federation of New Zealand	485	1	Oppose	<p><b>Oppose relief sought to Introduce a new Issue on Rural Character.</b></p> <p>Whangarei District Council agrees that protection of rural character and productive use of rural land is of importance to the District. Council has put significant effort, resourcing and consultation into creating a Rural Development Strategy leading into plan changes to the Operative District Plan specifically focused upon addressing this issue. Council believes that this issue is best addressed at a district level and questions the suitability of establishing an issue in the RPS. NRC has made a conscious decision to include only those issues that are significant to the region in the RPS, issues of lesser or local significance should be dealt with at the regional or district plan level (pg7 Section 32 Analysis Report).</p>
Director General of Conservation	568	41	Oppose in Part	<p><b>Oppose in part relief sought to Policy 4.6.1</b></p> <p>WDC agrees that the mapping in the RPS is somewhat incomplete, and also support in principle the concept of mapping the Coastal Environment, Natural Character and Outstanding Natural Landscapes and Features. However the relief sought, to insert an explanatory note justifying the mapping inaccuracies is contrary to the primary relief sought by Council in its original submission. To avoid duplication, WDC believes that the mapping exercise should be completed in a comprehensive manner.</p>

Far North District Council	362	31	Support	<p><b>Support Relief sought to Policy 4.6.1</b></p> <p>WDC support the inclusion of the mapping methodology/criteria for identifying landscape and natural character areas and the coastal environment in the RPS.</p>
Winstones Aggregates	560	24	Oppose	<p><b>Oppose Relief sought to Policy 4.6.1</b></p> <p>Including the Objective as notified is contrary to the primary relief sought by WDC's primary submission.</p>
Director General of Conservation	568	43	Oppose	<p><b>Oppose relief sought to Policy 4.6.2</b></p> <p>Changes sought to Policy 4.6.2 are opposed as they are contrary to the relief sought by Whangarei District Council. Council believes that providing for a process to review maps suggested in Policy 4.6.2 will be time consuming, costly to District Councils and opens the opportunity for the undermining of the accuracy of the coastal environment boundary.</p>
Winstones Aggregates	560	17	Oppose	<p><b>Oppose Relief sought to Policy 4.6.2</b></p> <p>Delete Method 4.6.2.</p>
Environmental Defence Society	360	43	Support	<p><b>Support Relief Sought to Policy 4.6.2</b></p> <p>Delete Method 4.6.2.</p>
Director General of Conservation	568	44	Oppose	<p><b>Oppose relief sought in Policy 4.6.4.</b></p> <p>To avoid duplication and unnecessary costs WDC believes that the mapping exercise should be completed in a comprehensive manner. The timeframes introduced within method 4.6.4 are extremely tight allowing District Councils limited time to create plan changes. According to method 4.6.4 (1) District Council has two years to incorporate the relevant regional maps into the District Plan. The relief sought, to insert a new clause providing for a plan change to update the RPS maps within 12 months of the RPS becoming operative will result in unnecessary confusion and miscommunication to the public. District Councils will be preparing and notifying plan changes while a plan change will have to be undertaken by Regional Council.</p>
Environmental Defence Society	360	46	Oppose	<p><b>Oppose relief sought to Policy 4.6.4.</b></p> <p>The submitter has sought a 12 month timeframe for incorporating regional maps into the District Plan. District Council's will be required to create provisions to accompany the regional maps in District Plans including supporting Section 32 evaluation. Two years is a very tight timeframe to meet this requirement, 12 months would be impossible timeframe to meet, to plan and to allocate funding.</p>

Environmental Defence Society	360	59	Support	<p><b>Support in part relief sought to Policy 4.9.5</b></p> <p>NRC in its Plan Change 4 – Aquaculture, to the operative RPS identified areas of the CMA where aquaculture would be a prohibited activity. WDC undertook community consultation in preparation for its submission on Plan Change 4, as well as in preparation for the Coastal Management Strategy and would not like to see these efforts wasted. WDC submits that aquaculture should only be permitted where it does not adversely affect recreational and natural values, and avoid existing and consented stormwater and wastewater discharge points and areas. Words to this effect should be included in the policy.</p>
Winstone Aggregates	560	35	Oppose	<p><b>Oppose relief sought to 5 Regional Form and Infrastructure</b></p> <p>WDC opposes the relief sought as the submitter seeks to include a policy in regard to regional significant mineral resources that would give regionally significant mineral resources a higher level of influence of decision making, irrespective of whether the resources are actively being used or are simply catalogued. The proposed level of weighting is especially concerning given WDC unease about the criteria used to identify regionally significant mineral resources (Policy 5.1.4).</p>
Kaipara District Council	507	16	Oppose in part	<p><b>Oppose relief sought to 5.1 Regional Form</b></p> <p>WDC opposes in part the relief sought as the submitter seeks to remove reference/seek amendments to 5.1.1 (a), 5.1.1(b) and 5.1.5 2(a). WDC believe that it is important to given effect to these provisions and seeks that they be retained. Changes sought to delete Policy 5.1.1(a) and 5.1.5(a) are opposed as they are contrary to the relief sought by Whangarei District Council. Council supports the development of Regional Form and development principles to guide future development in a sustainable manner. Accordingly Council believes statutory plans and strategies should give effect or take into account Policy 5.1.1(a) and (c)-(f).</p>
New Zealand Wind Energy Association	437	11	Oppose	<p><b>Oppose relief sought to Policy 5.1.1</b></p> <p>The submitter has sought to change the scope of regional form provisions to only relate to urban environment. Council feels the regional form should include, and take into account, the interrelationship between rural, urban and coastal areas holistically. Regional form policies should therefore not focus solely on urban environments but upon wider regional patterns.</p>
Winstone Aggregates	560	31	Oppose	<p><b>Oppose relief sought to 5.1.1 Policy – Planned and Co-ordinated Development</b></p> <p>WDC opposes the relief sought as the submitter seeks to amend policy to only refer to urban development. Other forms of development, including large industrial areas, roadways, ports and so on are also important shapers of regional form and should also be located designed and built in a coordinated matter. The submitter has sought to change the scope of regional form</p>

				provisions to only relate to urban development or built development. Council feels the regional form should include and take into account the interrelationship between rural, urban and coastal areas holistically. Regional form policies should therefore not focus solely on urban environments but upon wider regional patterns.
New Zealand Wind Energy Association	437	12	Oppose	<b>Oppose relief sought to Policy 5.1.2</b>  Changes sought to Policy 5.1.2 are opposed as it is considered to be inconsistent with the intent of the New Zealand Coastal Policy Statement (Policy 6 and 7).
Director General of Conservation	746	83	Support	<b>Support relief sought to 5.1.3 Policy – Avoiding the Adverse Effects of New Use(s) and Development</b>  WDC supports the relief sought as the submitter seeks more recognition of ecosystem services as a resource on which economic activity is dependant, which is similar to the position held by WDC.
Kaipara District Council	507	17	Oppose	<b>Oppose relief sought to 5.1.3 Policy – Avoiding the Adverse Effects of New Use(s) and Development</b>  WDC opposes the relief sought as the submitter seeks to remove a policy which is an important part of a wider package of provisions designed to better manage use and development. The submitter has sought to delete Policy 5.1.3. Council considers this policy to be part of the policy package and thus the intention of the chapter would be severely impacted. Therefore Council supports the inclusion of this policy and opposes the relief sought.
Minewatch	687	2	Oppose	<b>Oppose relief sought to 5.1.3 Policy – Avoiding the Adverse Effects of New Use(s) and Development</b>  The submitter opposes all hard rock mining in Northland and seeks to prohibit activities within a two year timeframe once the RPS becomes operative. Whilst there may be situations in which hard rock mining is prohibited in a specific location in Northland, a blanket policy is not appropriate. In addition, two years is a very tight timeframe to address the relief sought and it is not realistic for territorial authorities to meet this timeframe.
New Zealand Wind Energy Association	437	13	Oppose	<b>Oppose relief sought to Policy 5.1.3</b>  The submitter has sought to change the policy and explanation to focus on urban development (provisions only relate to urban environments). Council feels the regional form should include and take into account the interrelationship between rural, urban and coastal areas holistically. Regional form policies should therefore not focus solely on urban environments.

Fonterra Co-operative Group Ltd	681	16	Oppose	<p><b>Oppose relief sought to 5.1.5 Method – Statutory Plans and Strategies (1)(e)</b></p> <p>The submitter has sought to amend Policy 5.1.5 to require consultation with relevant industry. Council supports consultation in plan development processes and resource consent applications. Section 36(A) of the RMA outlines the duties of local authorities and applicants to consult. Council believes there is no scope to consult additional parties in relation to regionally significant industries.</p>
Golden Bay Cement	608	11	Oppose	<p><b>Oppose relief sought to 5.1.5 Method – Statutory Plans and Strategies (1)(e)</b></p> <p>The submitter has sought to amend Policy 5.1.5 to require consultation with owners of regionally significant mineral resources. Council supports consultation in plan development processes and resource consent applications. Section 36(A) of the RMA outlines the duties of local authorities and applicants to consult. Council believes there is no scope to consult additional parties in relation to regionally significant industries.</p>
Northpower	499	14	Oppose	<p><b>Oppose relief sought to 5.1.5 Method – Statutory Plans and Strategies (1)(e)</b></p> <p>The submitter has sought to amend Policy 5.1.5 to require consultation with relevant infrastructure 'is proposed in closed proximity to existing or planning regionally significant infrastructure'. Council supports consultation in plan development process and resource consent applications. Section 36(A) of the RMA outlines the duties of local authorities and applicants to consult. Council believes there is no scope to consult regionally significant industries particularly if activities (including subdivision, land-use or development) are proposed. In addition, how will 'close proximity' be defined?</p>
Kaipara District Council	507	19	Oppose	<p><b>Oppose relief sought to 5.2.4 Method</b></p> <p>The submitter opposes the use of the Regional Form Guidelines and proposes to delete Method 5.2.4. Council supports the development of Regional Form and Development principles to guide future development in a sustainable manner. Accordingly Council supports the assessment of resource consent applications against Appendix 2, the Regional Form and development guidelines (principles).</p>
New Zealand Transport Agency	784	29	Oppose	<p><b>Oppose relief sought to 5.2.4 Method</b></p> <p>The submitter seeks clarity on the application of method 5.2.4., particularly when considering infrastructure proposals. Council is supportive of the intent of this method. however, scope and flexibility for territorial authorities is required. It would not be suitable to determine assessment criteria with a 'one size fits all' approach for development and applications in the Northland region.</p>

Northport and Northland Land Port Corp Ltd	230	15	Oppose	<p><b>Oppose relief sought to 5.2.4 Method</b></p> <p>The submitter seeks clarity on the application of method 5.2.4., particularly to determine a controlled activity. Council is supportive of the intent of this method. However, scope and flexibility for territorial authorities is required. It would not be suitable to determine assessment criteria with a 'one size fits all' approach for development and applications in the Northland region.</p>
Fonterra Co-operative Group Ltd	681	18	Oppose	<p><b>Oppose relief sought to Method 5.4.3</b></p> <p>The changes sought by the submitter require District Council to recognise and provide for secure sources of non-renewable energy. It is considered inappropriate and onerous to require District Councils to provide such sources.</p>
Environmental Defence Society	360	69	Support in part	<p><b>Support in part Relief sought to Policy 7.1.3</b></p> <p>The relief sought is supported in that it emphasises that in most cases, subdivision and development is inappropriate within identified high risk coastal hazard areas. However, the relief sought also asks that the policy state that land use change will be inappropriate. It is noted that land use change may be appropriate (and desirable) if it reduces the risk of adverse effects. Amending the policy to this effect will be consistent with NZCPS Policy 25(b), as well as PRPS Policy 7.1.4.</p>
Environmental Defence Society	360	78	Support in Part	<p><b>Support in part Relief sought to Method 7.1.8</b></p> <p>WDC supports the identification of 100 year hazard areas to assist in achieving Policy 7.14, However these areas should be provided to District councils to include in their District Plans rather than regional plans. It is noted that in Method 7.1.9 Regional Councils will provide hazard information to District Councils for inclusion in District Plans.</p>
Environmental Defence Society	360	79	Oppose	<p><b>Oppose Relief Sought to Method 7.1.8</b></p> <p>There is no evidence or analysis to suggest that activities within 100 year hazard areas should be non-complying activities. District Councils should be allowed to conduct a s32 analysis to determine the appropriate activity status relevant to their communities.</p>
Environmental Defence Society	360	83	Support	<p><b>Support Relief Sought to Method 7.1.9</b></p> <p>The areas potentially affected by coastal hazards over at least the next 100 years, as specified in Policy 7.1.4 should also be mapped in order to give effect to the Policy in District Plans.</p>

Horticulture New Zealand and Northland Horticulture Forum	830	4, 34 and 69	Oppose	<p><b>Oppose relief sought to Glossary, New Definition of Earthworks</b></p> <p>District Council must <u>give effect to</u> the RPS once operative, including the implementation of consistent definitions. It is the preference of Whangarei District Council that definitions, particularly those associated with methods in the RPS which require the District Council to impose rules, are appropriately assessed and created through a comprehensive process such as a plan change to the District Plan.</p>
Horticulture New Zealand and Horticulture Forum	830	4 and 73	Oppose	<p><b>Oppose relief sought to glossary, New Definition of Vegetation Clearance</b></p> <p>District Council must <u>give effect to</u> the RPS once operative, including the implementation of consistent definitions. It is the preference of Whangarei District Council that definitions, particularly those associated with methods in the RPS which require the District Council to impose rules, are appropriately assessed and created through a comprehensive process such as a plan change to the District Plan.</p>
Fonterra Co-operative Group Ltd	681	20	Oppose	<p><b>Oppose relief sought to Glossary</b></p> <p>WDC opposes the relief sought as the submitter seeks to put together a definition of water quality that may not be suitable for the region as a whole, including different stakeholders. Any such definition needs to be developed in agreement with a number of parties.</p>