

12 May 2024

Hearings Administrator  
Proposed Far North District Plan  
Far North District Council

By email: [alicia-kate.taihia@fndc.govt.nz](mailto:alicia-kate.taihia@fndc.govt.nz)

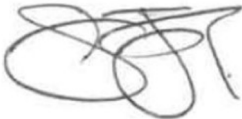
**RE: Hearing Statement - Topic 1 (Strategic Direction, Tangata Whenua, Part 1)**

1. We act for Waiaua Bay Farm Limited (“**WBFL**”) who lodged a submission (no. S463) and further submission (no. FS534) on provisions of the Proposed Plan that will be heard in Topic 1.
2. The provisions that WBFL made submissions on, and the subsequent s42A recommendations, are shown in Table 1 of this letter.
3. WBFL does **not** intend to file evidence, or appear, in relation to the matters in the scope of Topic 1.
4. WBFL has reviewed the s42A recommendations on provisions within the scope of its submissions. It accepts those recommendations, with an exception, discussed below.
5. WBFL’s further submission points FS534.002 and FS534.007 support the submissions of Te Rūnanga o Ngāti Rehia (S559.010) and Northland Regional Council (S359.010). Those original submissions note that securing resilient water supplies is a particular concern for the district and warrants recognition at the Strategic Directions level of the Proposed Plan.
6. Both original submitters note that the enablement of development relies on water supply, either through a network or on-site storage, to safeguard against droughts and climate change effects.
7. Paragraphs 282 – 283 of the s42A report recommend rejecting the relief sought on grounds that climate change is addressed throughout the strategic directions, that the detail required would not sit comfortably in the objectives of the strategic directions chapter, and, that climate change is specifically addressed in the Natural Hazards chapter of the Proposed Plan.
8. WBFL notes the NRC and rūnanga’s submissions include a specific focus on water security in the face of drought, as well as climate change more broadly. The proposed Natural Hazards chapter refers to droughts among other natural hazards. It specifically addresses river flood,

coastal, wildfire and land instability hazards but provides no objectives or policies to guide the district's response to droughts, such as in relation to the development of water storage facilities.

9. Proposed strategic directions SD-EP-O5 and SD-UFD-O4 objectives touch on climate change. They provide no guidance about responding to drought. In WBFL's view to do so would not require the addition of excessive detail to the strategic directions.
10. WBFL considers that the relief sought by Te Rūnanga o Ngāti Rehia and Northland Regional Council is appropriate in terms of section 75(3)(c) of the RMA 1991. The Northland Regional Policy Statement 2016 acknowledges Northland's water resilience issues and the need for adequate and sustainable water supplies for the future<sup>1</sup>.
11. WBFL thanks the Panel for its time and acknowledgement of the issues raised in WBFL's submissions. Please contact the undersigned if you wish to clarify any matters addressed herein.

Yours sincerely,



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<sup>1</sup> Including for example, Objective 3.10(c), Policy 4.3.4, and Method 4.3.6(2) and (4) relating to water storage.

**Table 1: WBFL’s original and further submissions and Topic 1 s42A recommendations.**

<b>Provision</b>	<b>Submission no.</b>	<b>s42A recommendation</b>
SD-UFD-O2	S463.005	Reject
New UFD objective proposed in relation to land adjoining Special Purpose Zones.	S463.006	Reject
SD-RE-O1	S463.007	Accept
SD-RE-O2	S463.008	Reject
SD-EP-O4	FS534.011	Reject
SD-EP-O5 [renumbered as SD-NE-O5]	S463.009	Accept
SD-SP-O3	FS534.008	Accept
SD-CP-O4	S463.004	Reject
SD-EP-O1	FS534.009	Accept
SD-EP-O2	FS534.0010	Accept
New provisions sought by Te Rūnanga o Ngāti Rehia (S559.010) and Northland Regional Council (S359.010) addressing the need for a resilient and reliable water supply.	FS534.002 FS534.007	Reject
KCZ-R3	FS534.054	Accept