



Submission on Proposed Far North District Plan

Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Far North District Council - District Planning

Date received: 21/10/2022

This is a submission on the following proposed plan (the **proposal**): Proposed Far North District Plan

Address for service:

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Attachments:

Remove this area of Ngawhitu Ltd from Pouerua Heritage Area.pdf

I wish to be heard: Yes

I am willing to present a joint case: No

Could you gain an advantage in trade competition in making this submission?
- **No**

Are you directly affected by an effect of the subject matter of the submission that
(a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition
- **No**

Submission points

Point 63.1 **S277.024**

Section: Planning Maps

Sentiment: Oppose

Submission:

The decision I seek from FNDC is to revert back to the original Pouerua Heritage Precinct boundary and to abolish the proposed expanded area described as the Pouerua Heritage Area. In particular I want the areas of our property outside the lava flow area to be excluded from the Pouerua Heritage Area as per the attached map.

In broad terms this is the area of developed open farmland between Jacks Lake and our Lake Owhareiti boundary. Approximately 300ha of Ngawhitu Ltd (our family farm where the Jack family has lived since 1949) is included in the proposed Pouerua Heritage area – so its impact on us is enormous.

The Pouerua Heritage Area as shown on the proposed planning map is larger than it needs to be, because it includes land that does not have the relevant heritage or landscape values. The proposed area unnecessarily includes farmland, which has been farmed for many years, and Jacks Lake, which is an artificial lake created in January 1975. These have no heritage value. If, in the unlikely event that any archaeological sites were to be discovered, they would be better identified individually on the planning maps, rather than placing blanket controls over the whole area. The use of the non-heritage land is unnecessarily constrained by the heritage area rules.

- The large new area captured in the expanded Pouerua Heritage Area is highly modified clay loam soils that have been cultivated & farmed by Europeans for generations.
- There is therefore no remaining evidence of pre-European Maori heritage in the expanded area between Jacks Lake and Lake Owhareiti
- There was no European colonial settlement in the 19th century in the proposed expanded Pouerua Heritage Area between Jacks Lake & Lake Owhareiti – any buildings in the area are less than 100 years old
- There has been no ground survey work done to find any heritage value in the area – it was a covid restricted desktop exercise by an Auckland consultant – a blunt process which diminishes the credibility of all the groundwork done to establish the original Pouerua Heritage Precinct.
- By adding this area (devoid of heritage), the mana & integrity of the entire Pouerua Heritage Precinct is diluted and undermined.
- The original Pouerua Heritage Precinct was an internationally significant archaeological site of uniquely & purely pre-European heritage – a source of immeasurable cultural connection for tangata whenua. It is inappropriate to combine colonial heritage (colonial buildings already have individual protections) with the many centuries of pre-European Maori heritage. It displays an insensitivity toward, or ignorance of, the impact of colonisation on tangata whenua. Pouerua should remain the unique domain of pre-European heritage.

Relief sought

Amend the Pouerua Heritage Area, by deleting the proposed map and replacing it with the map of the Pouerua Heritage Precinct from the Operative District Plan. Failing that, please remove the area on the attached map from the Pouerua Heritage Area

Point 63.2 **S277.002**

Section: Planning Maps

Sentiment: Oppose

Submission:

The Lake Owhareiti Trust are, and represent, the Maori beneficial owners of the lake.

Lake Owhareiti already has multiple layers of protection (ONF91, NRC environmental regulations, site of importance to Maori, etc) but the addition of Heritage Area restrictions would add cost & complexity to any future plans the trustees' might have - at a time when imminent Waitangi Settlements will at last enable them to fulfil their vision for their Lake.

The water's edge is considered the lake boundary and the lake level has lifted dramatically since it was first surveyed & mapped in the 19th century – any pre-European Maori heritage has long since been flooded or destroyed by European farm cultivation.

The eucalypt plantation on a peninsula of our land titles (currently an island) was planted by my grandfather & uncle. Heritage Area restrictions would make it unaffordable for us to harvest those trees to enable us to retire the area in native trees.

Lake Owhareiti has immeasurable cultural & environmental value but this does not warrant further restrictions on the basis of heritage.

Lake Owhareiti already has multiple layers of protection – let it be its own entity.

Relief sought

Amend the Planning Maps by removing Lake Owhareiti from the proposed Pouerua Heritage Area and reinstate the original boundary of Pouerua Heritage Precinct (which excluded Jacks Lake & Lake Owhareiti) as per the map of the Pouerua Heritage Precinct from the Operative District Plan.

Point 63.3 **S277.003**

Section: Heritage area overlays

Sub-section: Policies for Pouerua Heritage area overlay

Provision:

HA-P12 To maintain the integrity of the Pouerua Heritage area overlay and protect the heritage values by:

- a. recognising that Pouerua sits within a rural farming landscape with numerous Māori stone field systems, and historical drywall boundaries which reflect early rural subdivisions; and
- b. protecting the Sites and Areas of Significance to Māori, the pa sites and other landscape features which share a strong contextual and visual connection with the central Pouerua Pa.

Sentiment: Oppose

Submission:

HA-P12 – (a) not enough is known about the “historical drywall boundaries which reflect early rural subdivisions”. The rockwalls look nice but are not necessarily historic. Our family has built many dry walls. I oppose the notion that these fences can be used to impose restrictions on our land use. I oppose this policy. Approximately 300ha of our family farm (where the Jack family has lived since 1949) is included in the proposed Pouerua Heritage area – so it's impact on us is enormous.

Relief sought

Amend policy HA-P12 by deleting the words, “and historical drywall boundaries.”

Point 63.4 **S277.004**

Section: Heritage area overlays

Sub-section: Policies for Pouerua Heritage area overlay

Provision:

HA-P13 To enable subdivision and land use which recognises and protects the cultural and heritage values of Pouerua, and the strong connection and context of Pouerua scoria cone, Ohaewai volcanic field and Ngahuha scoria cone.

Sentiment: Support in Part

Submission:

HA-P13 I support the enabling of subdivision within the Pouerua Heritage area. The decision I want from FNDC is to enable subdivision on a case by case basis because there are vast areas within the proposed Pouerua Heritage area devoid of any heritage values – a blanket policy or rule which constrains well placed subdivision is an unreasonable financial burden on the land owner.

Relief sought

Retain HA-P13, but amend it to clarify that it also enables subdivisions and land use that make no difference to the cultural and heritage values of the area.

Point 63.5 *S277.005, S277.006*

Section: Heritage area overlays

Sub-section: Policies for Pouerua Heritage area overlay

Provision:

HA-P13 To enable subdivision and land use which recognises and protects the cultural and heritage values of Pouerua, and the strong connection and context of Pouerua scoria cone, Ohaewai volcanic field and Ngahuha scoria cone.

Sentiment: Support in Part

Submission:

I request that FNDC introduce Tradable Development Rights to compensate landowners for land uses & activities which the Heritage Area rules affect within the area.

The rules regarding the Pouerua Heritage area are too restrictive due to the fact that such large areas within the Pouerua Heritage area are devoid of heritage.

Relief sought

Add to the plan, policies and rules to introduce Tradable Development Rights to compensate landowners for land uses & activities which the Heritage Area rules affect within the area.

Point 63.6 *S277.007*

Section: Heritage area overlays

Sub-section: Rules

Sentiment: Oppose

Submission:

The rules regarding the Pouerua Heritage area are too restrictive due to the fact that such large areas within the Pouerua Heritage area are devoid of heritage. The decision I seek from FNDC is to apply less stringent rules to the area and allow for site specific activities – allow more, on a site by site basis. Other submissions below list examples.

Relief sought

Amend all rules related to the Pouerua Heritage Area, to ensure these do not unnecessarily regulate activities that do not affect heritage.

Section: Heritage area overlays

Sub-section: Rules

Provision:

HA-R1 Maintenance and repair of buildings or structures

All zones Activity status: Permitted

Where:

Activity status where compliance not achieved with PER-1 or PER-2: Restricted discretionary

Heritage Area overlays:

PER-1

Matters of discretion are restricted to:

Kerikeri The building or structure is a scheduled Heritage Resource and:

- Kohukohu**
1. the building or structure is not added to or altered;
 2. the existing external visual appearance of the building or structure is not changed; and
 3. if the building or structure is not repainted in its existing colour scheme, it must comply with standard HA-S2 Heritage Colours.
- Kororāreka Russell**

- a. the necessity of the work to maintain or repair the building or structure;
- b. whether any proposed change to the building or structure will adversely affect the heritage values of the Heritage area overlay;
- c. whether the proposed change will adversely affect the heritage values of any nearby Scheduled Heritage Resource;
- d. whether there is a practicable reason why the building or structure needs to be altered or have its appearance changed;
- e. any assessments or advice from a suitably qualified and experienced heritage or cultural expert;
- f. the colour of all exterior surfaces and their appropriateness within the Heritage area overlay; and
- g. any consultation with Heritage New Zealand Pouhere Taonga, Department of Conservation and tangata whenua.

PER-2

Mangōnui and Rangitoto If the building or structure is located within the Kororāreka Russell Heritage Overlay and is not repainted in its existing colour scheme, it must comply with standard HA-S2 Heritage Colours.

Peninsula

Note: this rule applies to maintenance or repair works, if the works do not meet the definition of maintenance or repair then refer to the other relevant rules for additions and alterations.

Paihia

Pouerua

Rangihoua

Rāwene

Te Waimate

Sentiment: Oppose

Submission:

HA-R1 I oppose any form of restriction on the basis of heritage regarding the maintenance & repair of our buildings & structures within the proposed Pouerua Heritage area. They have no heritage value and any such restrictions on their repairs &

maintenance therefore incur additional cost without the intended gain for heritage.

Relief sought

Amend rule HA-R1 so that there is no restriction on maintenance and repair of buildings or structures that have no heritage value.

Point 63.8 **S277.009**

Section: Heritage area overlays

Sub-section: Rules

Provision:

HA-R2 Additions or alterations to existing buildings or structures

All zones Activity status: Permitted

Activity status where compliance not achieved with PER-2 or PER-3: Restricted discretionary

Where:

Heritage Area overlays:

PER-1

Matters of discretion are restricted to:

Kerikeri – Resource.
Part B The building or structure is not a scheduled Heritage Resource.

- a. the necessity of the addition or alteration;
- b. whether any proposed change to the building or structure will

PER-2

Kororāreka – Russell
Part D If the addition or alternation is external it is not located within a site containing a scheduled Heritage Resource.

- c. whether the proposed change will adversely affect the heritage values of the Heritage overlay;
- c. whether the proposed change will adversely affect the heritage

PER-3

Mangōnui and Rangitoto Peninsula – Part B
The addition or alteration to the building or structure complies with standards:
HA-S1 Setback from a scheduled Heritage Resource; and
HA-S2 Heritage Colours

- d. whether there is a practicable reason why the building or structure needs to be altered or have its appearance changed;
- e. any assessments or advice from a suitably qualified and

Paihia – Part B

Standard HA-S2 does not apply if the additions or alterations is painted to match the existing colour scheme of the building or structure.

- f. the colour of all exterior surfaces and their appropriateness within

Pouerua

- g. any landscaping or fencing to maintain heritage boundary

Rangihoua

- h. the location and relationship of the building or structure in relation

Rāwene Part B

- i. any consultation with Heritage New Zealand Pouhere Taonga,

Te Waimate

**Activity status where compliance not
achieved with PER-1: Discretionary**

All zones PER-4

**Activity status where compliance not
achieved with PER-4, PER-5, PER-6 or PER-7:
Discretionary**

The building or structure is not a scheduled Heritage Resource.

**Heritage Area
overlays:**

PER-5

Kerikeri Part A – If the addition or alternation is external it is not located within a site containing a scheduled Heritage Resource.

Kohukohu PER-6

The addition or alternation is not visible from any public place.

Kororāreka

Russell – PER-7

Part A – The Strand, Part B The addition or alteration to the building or structure complies with standards:

Wellington Street and Part C – HA-S1 Setback from a scheduled Heritage Resource; and
HA-S2 Heritage Colours.

**Christ
Church**

Standard HA-S2 does not apply if the additions or alterations is painted to match the existing colour scheme of the building or structure.

**Mangōnuī
and
Rangitoto
Peninsula –
Part A**

**Paihia – Part
A**

Rangihoua

**Rāwene –
Part A**

Te Waimate

Sentiment: Oppose

Submission:

HA-R2 I oppose any form of restriction on the basis of heritage regarding additions or alterations to our existing buildings & structures within the Proposed Heritage area. They have no heritage value and any such restrictions therefore incur additional cost without the intended gain for heritage.

Relief sought

Amend rule HA-R2 so that there is no restriction on additions or alterations to existing buildings or structures that have no heritage value.

Point 63.9 **S277.010**

Section: Heritage area overlays

Sub-section: Rules

Provision:

HA-R4 **New buildings or structures**

All zones **Activity status: Permitted**

Activity status where compliance not achieved with PER-1 or PER-2: Restricted Discretionary

Heritage Area Where:
overlays:

Matters of discretion are restricted to:

PER-1

Kerikeri –
Part B

The new building or structure is not located within a site containing a scheduled Heritage Resource.

- a. whether the proposed building or structure will adversely affect the heritage values of the Heritage Area overlay;
- b. whether the proposed building, structure will adversely affect the heritage values of any nearby scheduled Heritage Resource;
- c. whether there is a practicable reason why the building, structure needs to be located within the Heritage Area overlay;
- d. any assessments or advice from a suitably qualified and experienced heritage or cultural expert;
- e. the colour of all exterior surfaces and their appropriateness within the Heritage Area overlay;
- f. any landscaping or fencing to maintain heritage boundary treatments and curtilage;
- g. the location and relationship of the building or structure in relation to adjoining sites and the road; and
- h. any consultation with Heritage New Zealand Pouhere Taonga, Department of Conservation and tangata whenua.

Mangōnui
and

PER-2

Rangitoto The building or structure complies with standard HA-S1
Peninsula – Setback from a scheduled Heritage Resource.
Part B

Paihia – Part
B

Pouerua

Rāwene Part
B

Sentiment: Oppose

Submission:

HA-R4 New buildings or structures. I oppose the additional layer of bureaucracy which the Heritage area zone introduces to establishing new buildings or structures within the Pouerua Heritage area – this represents a substantial & unreasonable devaluation of land use, which will have financial implications for my intergenerational family business's equity and debt serviceability. I am concerned about my ability to provide housing for staff – especially as Climate Change legislation forces a change in land use from extensive ruminant agriculture into more intensive land use such as horticulture which requires more housing for staff.

Relief sought

Amend rule HA-R4 so that there is no restriction on new buildings or structures that have no impact on heritage or landscape values.

Point 63.10 **S277.011**

Section: Heritage area overlays

Sub-section: Rules

Provision:

HA-R5 **Earthworks**

All zones **Activity status: Permitted**

Where:

Activity status where compliance with PER-1 is not achieved: Restricted Discretionary

Heritage Area overlays:

PER-1

Matters of discretion are restricted to:

The earthworks:

Kerikeri – Part B

1. comply with the relevant permitted activity rules within the Earthworks chapter
2. are not within 20m of a scheduled Heritage Resource.

- a. whether the proposed earthworks will adversely affect the heritage values of the Heritage Area overlay;
- b. whether the proposed earthworks will adversely affect the heritage values of any nearby scheduled Heritage Resource;
- c. any adverse effects on any archaeological site;
- d. any assessments or advice from a suitably qualified and experienced heritage or cultural expert;
- e. any methods of site rehabilitation;
- f. whether or not EW-S3 Accidental Discovery Protocol has been met; and
- g. any consultation with Heritage New Zealand Pouhere Taonga, Department of Conservation and tangata whenua.

Mangōnui and Rangitoto

Peninsula – Part B

Paihia – Part B

Pouerua

**Rāwene -
Part B**

Te Waimate

**Kororāreka
Russell - Part
D**

All zones PER-2

**Activity status where compliance not
achieved with PER-2 or PER-3: Discretionary**

The earthworks:

**Heritage Area
overlay:**

1. do not exceed 2m³ in volume over an area of 5m² ;
2. is not within 20m of a scheduled Heritage Resource;
3. complies with standard HA-S3
Accidental Discovery Protocol.

**Kerikeri –
Part A**

**Kororāreka
Russell –
Part A The
Strand**

All zones PER-3

The earthworks

**Heritage Area
overlays:**

1. do not exceed 200m³
2. are not within 20m of a scheduled Heritage Resource;
3. complies with HA-S3 Accidental Discovery Protocol.

Kohukohu

**Kororāreka
Russell
Heritage
overlay –
Parts B
Wellington
Street and C
Christ
Church**

**Mangōnuī
and
Rangitoto**

**Peninsula –
Part A**

**Paihia – Part
A**

**Rāwene -
Part A**

Rangihoua

Sentiment: Oppose

Submission:

HA-R5 Again, with so much area devoid of heritage, it is unreasonable to apply additional compliance cost regarding earthworks within the Pouerua Heritage area.

Relief sought

Amend rule HA-R5 to remove controls on earthworks within 20m of a scheduled Heritage Resource.

Point 63.11 **S277.012**

Section: Heritage area overlays

Sub-section: Rules

Provision:

HA-R6 **Infrastructure and renewable electricity generation infrastructure**

All zones **Activity status: Permitted**

Where:

**Heritage Area
overlays:**

PER-1

**Activity status where compliance with PER-1
is not achieved: Restricted Discretionary**

Kerikeri – scheduled Heritage Resource.
Part B

Matters of discretion are restricted to:

- a. whether the proposed infrastructure will

**Mangōnui
and
Rangitoto
Peninsula –
Part B**

**Paihia – Part
B**

Pouerua

**Rāwene -
Part B**

Te Waimate

**Kororāreka
Russell - Part
D**

Sentiment: Oppose

Submission:

HA-R6 & HA-R10 Infrastructure and renewable electricity generation infrastructure. I oppose the proposed restriction on this land use within the Pouerua Heritage area – again, it is an additional layer of compliance cost that isn't justified and it reduces our land use options at a time when the ruminant agriculture that predominates in the area is being forced to reduce emissions. The rule may be intended to protect heritage, but it is drafted too widely, because it sterilises development across the whole extent of a large farm containing one heritage resource.

Relief sought

Amend rules HA-R6 to remove controls on renewable electricity generation infrastructure

Point 63.12 **S277.013, S277.014**

Section: Heritage area overlays

Sub-section: Rules

Provision:

HA-R10 **Infrastructure and renewable electricity generation infrastructure**

All zones **Activity status: Discretionary**

**Activity status where compliance not
achieved: Not applicable**

**Heritage Area
Overlays:**

- adversely affect the heritage values of the Heritage Area overlay;
- b. whether the proposed infrastructure will adversely affect the heritage values of any nearby Scheduled Heritage Resource;
 - c. whether there is a practicable reason why the infrastructure needs to be located within the Heritage Area overlay or an a site that contains a Scheduled Heritage Resource;
 - d. any assessments or advice from a suitably qualified and experienced heritage or cultural expert;
 - e. the colour of all exterior surfaces and their appropriateness within the Heritage Area overlay;
 - f. any landscaping or fencing to maintain heritage boundary treatments and curtilage;
 - g. the location and relationship of the infrastructure in relation to adjoining sites and the road; and
 - h. any consultation with Heritage New Zealand Pouhere Taonga, Department of Conservation and tangata whenua.

**Kerikeri –
Part A**

Kohukohu

**Kororāreka
Russell –**

**Part A – The
Strand, Part
B –
Wellington
Street and
Part C –**

**Christ
Church**

**Mangōnui
and
Rangitoto
Peninsula –
Part A**

**Paihia – Part
A**

Pouerua

Rangihoua

**Rāwene –
Part A**

Te Waimate

Sentiment: Oppose

Submission:

HA-R10 & HA-R11 I oppose the DISCRETIONARY activity status within the Pouerua Heritage area for the reasons already listed above. There is no justification for an unlimited discretionary activity consent status to be required in this specialised

context, far exceeding the heritage and landform objective as set out in HA-O1.

Relief sought

Amend rules HA-R10 and HA-R11 to remove discretionary activity status. To the extent that any resource consents are required in this context, the consent status should be restricted discretionary, with discretion restricted to effects only on heritage and landscape values.

Point 63.13 **S277.015**

Section: Heritage area overlays

Sub-section: Rules

Provision:

HA-S2 Heritage Colours

All zones The exterior facades of all buildings or structures are finished in accordance with the colour scheme from the following paint ranges or equivalent: **Where the standard is not met, matters of discretion are restricted to: Not applicable**

All Heritage Overlays:

- i. resene heritage colours;
- ii. resene whites and neutrals; and
- iii. resene colour range BS5252 (A01-C40 range).

Kerikeri

Kohukohu

**Kororāreka
Russell**

**Mangōnui
and
Rangitoto**

Peninsula

Paihia

Pouerua

Rangihoua

Rāwene

Te Waimate

Sentiment: Oppose

Submission:

HA-S2 Heritage colours – I oppose the imposition of standards restricting the colour of the exterior facades of all buildings or structures. There are no heritage buildings on our land – all would be considered modern and so restrictions on colours is over reaching the intention to preserve heritage.

Relief sought

Amend standard HA-S2, so that it does not apply to Pouerua Heritage Area.

Point 63.14 **S277.016**

Section: Natural features and landscapes

Sub-section: Rules

Provision:

NFL-R1 **New buildings or structures, and extensions or alterations to existing buildings or structures**

Within ONL and ONF **Activity status: Permitted**

Activity status when compliance not achieved with PER-1, PER-3 and PER-4:

Where:

Discretionary

Activity status when compliance not achieved with PER-2:

PER-1

Non-complying

If a new building or structure is located outside the coastal environment it is:

1. ancillary to farming (excluding a residential unit);
2. no greater than 25m².

PER-2

If a new building or structure is located within the coastal environment it is:

1. ancillary to farming (excluding a residential unit);
2. no greater than 25m².

PER-3

Any extension to a lawfully established building or structure is no greater than 20% of the GFA of the existing lawfully established building or structure.

PER-4

The building or structure, or extension or alteration to an

existing building or structure, complies with standards:

NFL-S1 Maximum height

NFL-S2 Colours and materials

Sentiment: Oppose

Submission:

Approximately 270ha of our farm falls into the Outstanding Natural Feature overlay NFL-R1 PER-1 I support the permission to establish new buildings ancillary to farming but oppose the exclusion of residential unit and the restriction to 25m². As we transition from ruminant farming to intensive horticulture we will need more buildings & dwellings - to reduce carbon emissions and prosper.

Relief sought

Amend rule NFL-R1 by deleting the words:

"(excluding a residential unit)"

"2. No greater than 25m²."

Point 63.15 **S277.017**

Section: Natural features and landscapes

Sub-section: Rules

Provision:

NFL-R2 **Repair or maintenance**
Within ONL **Activity status: Permitted**
and ONF

**Activity status when compliance not achieved
with PER-1:**

Discretionary

Where:

PER-1

The repair or maintenance of the following activities where they have been lawfully established and where the size, scale and materials used are like for like:

1. roads
2. fences
3. network utilities
4. driveways and access
5. walking tracks
6. cycling tracks
7. farming tracks

Sentiment: Support

Submission:

NFL-R2 I support the ability to repair & maintain as per the listed activities in PER-1

Repairs & maintenance are an essential component of sustainable business & land use.

Relief sought

Retain NFL-R2 PER-1.

Point 63.16 **S277.018**

Section: Natural features and landscapes

Sub-section: Rules

Provision:

NFL-R3 Earthworks or indigenous vegetation clearance

Within ONL and ONF Activity status: Permitted

Activity status when compliance not achieved with PER-1 or PER-2:

Where:

Discretionary

Activity status when compliance not achieved with PER-3:

PER-1

Non-complying

The earthworks or indigenous vegetation clearance is:

1. required for the repair or maintenance permitted under NFL-R2 Repair or maintenance.
2. required to provide for safe and reasonable clearance for existing overhead power lines.
3. necessary to address a risk to public health and safety.
4. for biosecurity reasons.
5. for the sustainable non-commercial harvest of plant material for rongoā Māori.

PER-2

The earthworks or indigenous vegetation clearance outside the coastal environment is not provided for within NFL-R3 PER-1 but it complies with standard NFL-S3 Earthworks or indigenous vegetation clearance

PER-3

The earthworks or indigenous vegetation clearance inside the coastal environment is not provided for within NFL-R3 PER-1 but it complies with standard NFL-S3 Earthworks or indigenous vegetation clearance

Sentiment: Support

Submission:

NFL-R3 I support the ability to undertake earthworks & indigenous vegetation clearance

Relief sought

Retain NFL-R3.

Point 63.17 **S277.019**

Section: Natural features and landscapes

Sub-section: Rules

Provision:

NFL-R5	Plantation forestry and plantation forestry activity	
Within ONL and ONF	Activity status: Discretionary	Activity status where compliance not achieved with DIS-1: Non-complying
	Where:	
	DIS-1	
	The plantation forestry or plantation forestry activity is located outside the coastal environment.	

Sentiment: Oppose

Submission:

NFL-R5 I oppose the discretionary rule applying to plantation forestry & associated activities because our ruminant agriculture is under climate change pressures to switch land use into carbon sequestration and this rule will add complexity & expense to this desired land use change. There is no justification for an unlimited discretionary activity consent status to be required in this specialised context, far exceeding the objective as set out in NFL-O2.

Relief sought

Amend rule NFL-R5 to remove discretionary activity status. To the extent that any resource consents are required in this context, the consent status should be restricted discretionary, with discretion restricted to effects only on natural features and landscape values.

Point 63.18 **S277.020**

Section: Natural features and landscapes

Sub-section: Rules

Provision:

NFL-R6	Farming	
Within ONL and ONF	Activity status: Discretionary	Activity status where compliance not achieved with DIS-1: Non-complying
	Where:	
	DIS-1	

The farming activity and is located outside the coastal environment.

Sentiment: Oppose

Submission:

NFL-R6 I oppose the discretionary status applied to farming in this area – this is farmland and it is farming that has been the guardian of this ONF. Without farming it wouldn't be the fascinating landform that it is. I oppose this restrictive rule also because it impacts 270ha of our land and would cause unreasonable regulatory complexity & cost to our family business. Good fences & water systems ensure livestock can be managed without causing the accelerated erosion associated with treading damage from livestock walking between grass & water. Good farm management will preserve & enhance the area.

Relief sought

Delete rule NFL-R6, and make farming a permitted activity.

Point 63.19 **S277.021**

Section: Natural features and landscapes

Sub-section: Standards

Provision:

NFL-S1 **Maximum height**

Within ONL and ONF

1. The maximum height of any new building or structure above ground level is 5m and must not exceed the height of the nearest ridgeline, headland or peninsula.
2. Any extension to a building or structure must not exceed the height of the existing building above ground level or exceed the height of the nearest ridgeline, headland or peninsula.

Where the standard is not met, matters of discretion are restricted to: Not applicable

Sentiment: Oppose

Submission:

Regarding the standards (NFL-S1, 2 &3) I oppose such restrictive standards on the height of buildings, the colours & materials used, and earthworks. I want the FNDC to make these standards more permissive in areas out of public view. 270ha of our land is impacted by this standard.

Relief sought

Amend standards NFL-S1, 2 & 3, so that there are more permissive standards on the height of buildings, the colours and materials used, and earthworks.

Point 63.20 **S277.022**

Section: Natural features and landscapes

Sub-section: Standards

Provision:

NFL-S2 **Colours and materials**

Within ONL The exterior surfaces of buildings or structures shall:

Where the standard is not met, matters of

and ONF

discretion are restricted to: Not applicable

1. be constructed of materials and/or finished to achieve a reflectance value no greater than 30%.
2. have an exterior finish within Groups A, B or C as defined within the BS5252 standard colour palette.

Sentiment: Oppose

Submission:

Regarding the standards (NFL-S1, 2 &3) I oppose such restrictive standards on the height of buildings, the colours & materials used, and earthworks. I want the FNDC to make these standards more permissive in areas out of public view. 270ha of our farm is impacted by this standard.

Relief sought

Amend standards NFL-S1, 2 & 3, so that there are more permissive standards on the height of buildings, the colours and materials used, and earthworks.

Point 63.21 **S277.023**

Section: Natural features and landscapes

Sub-section: Standards

Provision:

NFL-S3 **Earthworks or indigenous vegetation clearance**

Within ONL and ONF Any earthworks or indigenous vegetation clearance must (where relevant):

Where the standard is not met, matters of discretion are restricted to: Not applicable

1. not exceed a total area of 50m² over the life of the District Plan.
2. not exceed a cut height or fill depth of 1m.
3. screen any exposed faces.
4. be for the purpose of access and/or a building platform.

Note: The NESF requires a 10m setback from any natural wetland in respect of earthworks or vegetation clearance and may require consent from the Regional Council.

Sentiment: Oppose

Submission:

	Regarding the standards (NFL-S1, 2 &3) I oppose such restrictive standards on the height of buildings, the colours & materials used, and earthworks. I want the FNDC to make these standards more permissive in areas out of public view.
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Relief sought

Amend standards NFL-S1, 2 & 3, so that there are more permissive standards on the height of buildings, the colours and materials used, and earthworks.

Point 63.22 277.024

Section: Planning Maps

Sentiment: Oppose

Submission:

Jacks Lake is not a natural feature – it is man-made and was created by Ned Jack with financial assistance (50% subsidy for habitat creation) from the Acclimatization Society (now Fish & Game NZ) in 1975. I will provide multiple levels of evidence at the hearings stage.

I also oppose the inclusion of our land immediately adjacent to Lake Owhareiti in the ONF91 classification. Lake Owhareiti itself dictates its boundary, not a land title, or a line on a map. The farmland adjacent to the lake isn't an outstanding natural feature.

Relief sought

Amend the Planning Maps to exclude from area classified "ONF91 Pouerua (Pakaraka Mountain) scoria cone, lava field and lava-dammed lakes":

- Jacks Lake, and
- Lake Owhareiti foreshore area on our farm.

Legend  REMOVE FROM POUERUA HERITAGE AREA.

Draft heritage area

 Pouerua Heritage Area

Current heritage precinct

 Pouerua Heritage Precinct

S277.024

