



Remember  
submissions  
close at 5pm,  
Friday 21  
October 2022

## Proposed District Plan submission form

Clause 6 of Schedule 1, Resource Management Act 1991

Form 5: Submission on Proposed Far North District Plan

TO: Far North District Council

This is a submission on the Proposed District Plan for the Far North District.

### 1. Submitter details:

Full Name:	JILLIAN JANE KEARNEY		
Company / Organisation Name: (if applicable)			
Contact person (if different):			
Full Postal Address:	10 DE HAVEN STREET, OPUA 0200		
Phone contact:	Mobile: 021 0842 7837	Home:	Work:
Email (please print):	kearney.mcangus@gmail.com		
<p>2. (Please select one of the two options below)</p> <p><input checked="" type="checkbox"/> I <b>could not</b> gain an advantage in trade competition through this submission</p> <p><input type="checkbox"/> I <del>could</del> gain an advantage in trade competition through this submission</p> <p><i>If you could gain an advantage in trade competition through this submission, please complete point 3 below</i></p>			
<p>3. <b>Not Applicable</b></p> <p><input type="checkbox"/> I <del>am</del> directly affected by an effect of the subject matter of the submission that:</p> <p>_____ (A) Adversely affects the environment; and</p> <p>_____ (B) Does not relate to trade competition or the effect of trade competition</p> <p><input type="checkbox"/> I <del>am not</del> directly affected by an effect of the subject matter of the submission that:</p> <p>_____ (A) Adversely affects the environment; and</p> <p>_____ (B) Does not relate to trade competition or the effect of trade competition</p> <p><i>Note: if you are a person who could gain advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991</i></p>			



**The specific provisions of the Plan that my submission relates to are:**

Along with others in the BOI Watchdogs group, I have found it difficult to work out which sections relate or are intended to relate to dogs and dog owners. My submission however is in relation to:

any objectives, sections, policies, rules, regulations, practice notes, and supporting documentation which relates to wellbeing, dog owners, dogs, the banning of dogs (via resource consent conditions, covenants or consent notices), the impact of dogs on the environment, kennels, sub-divisions, dogs and their relationship with native flora and fauna, significant natural areas, zoning which limits dog ownership, and dog limits placed on Significant Natural Areas (SNAs).

This includes but is not limited to:

- Not currently in the documentation, but critical for review: the 'Practice Note For Significant Indigenous Flora and Fauna' and the 'Bay of Islands Kiwi Distribution Map Support Document'. Part 2, District Wide Matters, Strategic Direction, Economic, and social wellbeing: all social prosperity objectives, and Natural Environment: SDEP06.
- Any section which mentions pets, and/or pests (where dogs have been named pests).
- Any sections which state the aim is to "Encourage and support active management of pest plants and animals" or "Require landowners to manage pets and pest species to avoid risks to threatened indigenous species."
- Subdivision section, SUB-R3, CON-2.
- IB-02: Indigenous biodiversity is managed to maintain its extent and diversity in a way that provides for the social, economic and cultural well-being of people and communities.
- IB-P7: Encourage and support active management of pest plants and pest animals.
- IB-P9: Require landowners to manage pets and pest species, including dogs, cats, possums, rats and mustelids, to avoid risks to threatened indigenous species, including avoiding the introduction of pets and pest species into kiwi present or high-density kiwi areas.
- IB-P10 and all subsections: Manage land use and subdivision to address the effects of the activity requiring resource consent for indigenous vegetation clearance and associated land disturbance, including (but not limited to) consideration of the following matters where relevant to the application: (including all clauses).
- Part 3, Appendices - APP3 – Subdivision management plan criteria, including (i) measures to protect, manage and enhance indigenous vegetation and habitats, ONL and ONF, heritage resources and riparian margins, including appropriate means of controlling dogs, cats, rats, mustelids and other animal pests and the means of controlling pest plants.

Official records of recent FNDC decisions on consenting issues appear to indicate the District Plan provisions are being overridden by practice notes. The content of the known notes is not reflected in the proposed DP, and the notes have not been disclosed. That prevents an accurate assessment of the impact of the District Plan on individuals or the district, and raises questions about the statutory compliance and integrity of the consultation process and outcomes. In addition, there is no identification of SNA's or the "Kiwi" areas referred to in the clauses mentioned above, which also makes it impossible to properly understand and assess the impact of the DP on individuals and or the district. I ask Council to make those critical documents, and all other undisclosed relevant information, publicly available now. Two such critical documents are:

- The 'Practice Note for Significant Indigenous Flora and Fauna', and
- The 'Bay of Islands Kiwi Distribution Map – Support Document'.

Confirm your position:     Support     Support In part     **Oppose**  
(please tick relevant box)

S343.001



**My submission is:**

I am a member of the Bay of Islands Watchdogs and I support their submissions and their recommendations.

I am hopeful that our newly elected Council will mark a watershed in terms of how FNDC chooses to act towards residents who own dogs; we comprise almost half of this district, but as with other demographics, have hitherto been inadequately represented round the council table. I would like to see council policy and strategy open up to become more inclusive of our values and views, in the same way that Council itself has become more diverse.

Dogs have been family members, best friends, counsellors, guides, protectors, workmates, and farm workers for centuries. Their inestimable value to human society generally cannot be in question. I support effective environmental measures and controls being put in place to protect our flora and fauna, but limiting dog ownership as a theoretical means of achieving this is unscientific, random, and inevitably self-defeating. It is cutting off your nose to spite your face: attempting to improve matters by making them much, much worse. I do not accept by either justice or logic that FNDC has a pre-emptive right to ban or restrict anyone from owning pets responsibly, anywhere in Northland. Cars might be said to inflict a far more significant and regular toll on kiwis, for example, but nobody would accept a like authority having the right to ban responsible drivers from owning and driving cars on that basis. There is passion but no logic in this position.

FNDC management's choices to ban and restrict dog owners for two decades indicate the shortfall of this kind of extremism, in that they have failed to consider the unintended consequences of their actions.

Those consequences, as our group BOI Watchdogs notes, include:

- negative economic impacts on our rohe in terms of housing and worker availability,
- humanitarian and mental health crises with people having to relinquish pets,
- animal rescue services and pounds being overwhelmed with dogs, and financially stressed
- animal rescue services being unable to find land which is suitably zoned for them to base their operations,
- fewer children living in homes which have dogs, which means they will increase their risk of harm from dogs because they will not learn how to care for, respect, and control their dogs,
- increase in the number of dogs being dumped in the bush due to lack of available rentals, which has a potentially serious impact on native wildlife,
- negative impact on real estate agents and developers, by reducing their potential buyer/tenant markets, even when they offer FNDC multiple means by which potential owners could control dogs effectively in high density kiwi areas (e.g. fencing, registration, micro-chipping, and de-sexing requirements),
- reduction in tourism from family members who own dogs deciding not to travel North, as their parents live in areas where their dogs are not allowed,
- reduction in tourism from dog-owners who are sight-seeing, as Northland's reputation for anti-dog attitudes grows,
- less positive view of our district as a retirement area,
- legal implications for FNDC should the community decide to challenge these restrictions/bans,
- further decrease in (already fragile) trust between FNDC management and around half the community, who own dogs,
- decrease in trust between dog owners and DOC, which in turn makes us wary of their advice about dogs and wildlife,



- lessened participation in local democracies, as residents give up trying to engage with a council they believe is just not listening,
- creation of a false and destructive division between environmentalists and bird lovers, versus dog lovers, in our local communities which did not previously exist (we are all animal lovers), and
- increasing anger from dog lovers about kiwi release programmes, which are seen as impinging on our right to live in more and more townships.

There are additional issues which have had a critical impact on trust between council management and the dog-loving community. These are detailed in the BOI Watchdog submission and need to be addressed urgently as they underlie the mistrust that has built over many years between FNDC and dog owners, which in turn damages FNDC's capacity to encourage voluntary commitment to the environmental and ecological goals FNDC is seeking to achieve. Those issues include:

- anger and fear among women about the lack of attention paid to sexual harassment complaints in the animal management department,
- potentially poorer quality applicants for jobs in animal management and district services, particularly from women, as the alleged toxicity and misogyny in that department becomes even more widely known,
- anger at the amount of time spent in consultation processes that do not lead to substantive change,
- frustration at the adversarial, rather than collaborative, nature of FNDC management,
- anger at disrespect towards cultural considerations,
- a belief, founded or otherwise, that FNDC management might 'hide' or obfuscate policies and documents which could have a serious impact on our dogs and lives,
- a belief that – colloquially speaking - FNDC management wants Northland to become a kiwi haven, where there are no dogs or cats permitted – a huge, flightless bird aviary,
- an increasing sense of unfairness that FNDC appears to have worse planning rules for residents, and easier rules for FNDC's own projects and properties, and
- increasing disrespect for and lack of trust in the FNDC legal department's advice in relation to bylaws, dogs, and dog restrictions.

**I seek the following decisions from Council:**

Please see Bay of Islands Watchdog submission for specific recommended decisions, which I support. More generally I would welcome the application of a little more logic and a little less prejudice in Council's vision of how we will all live in the Far North of the future.

S343.002

**YES I wish to be heard in support of my submission**

~~I do not wish to be heard in support of my submission~~

(Please tick relevant box)

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Yes-  **No**

Do you wish to present your submission via Microsoft Teams?

Yes  **No**

**Signature of submitter:** (or person authorised to sign on behalf of submitter)



Jillian Kearney

Date: 21.10.22

(A signature is not required if you are making your submission by electronic means)

**Important information:**

1. The Council must receive this submission before the closing date and time for submissions (5pm 21 October 2022)
2. Please note that submissions, including your name and contact details are treated as public documents and will be made available on council's website. Your submission will only be used for the purpose of the District Plan Review.
3. Submitters who indicate they wish to speak at the hearing will be emailed a copy of the planning officers report (please ensure you include an email address on this submission form).

**Send your submission to:**

**Post to:** Proposed District Plan  
Strategic Planning and Policy, Far North District Council  
Far North District Council,  
Private Bag 752  
KAIKOHE 0400

**Email to:** [pdp@fndc.govt.nz](mailto:pdp@fndc.govt.nz)

**Or you can also deliver this submission form to any Far North District Council service centre or library, from 8am – 5pm Monday to Friday.**

**Submissions close 5pm, 21 October 2022**

**Please refer to [pdp.fndc.govt.nz](http://pdp.fndc.govt.nz) for further information and updates.**

*Please note that original documents will not be returned. Please retain copies for your file.*

**Note to person making submission**

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious
- It discloses no reasonable or relevant case
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- It contains offensive language
- It is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

**SUBMISSION NO**

**SUBMISSION NUMBER**