

NOTICE OF MEETING

STRATEGY AND COMMUNITY COMMITTEE

TO: Penny Webster - Mayor
Crs Zane Taylor (Chairperson)
Ross Craig
Pat Delich
Michael Goudie
Gaye Harding
John Kirikiri
Dave Parker QSM
Grahame Powell
June Turner
Greville Walker
Wayne Walker
Suzanne Weld

The Strategy and Community Committee will meet in the Council Chamber, Centreway Road, Orewa on Wednesday 28 July, 2010, commencing at 2.00 p.m., on Thursday 29 July, 2010, commencing at 9.00 a.m., and on Monday 2 August, 2010, (if required) commencing at 9.00 a.m. for the purpose of hearing submissions to the draft Rural Strategy.

for: ACTING CHIEF EXECUTIVE
Warren Maclennan

OREWA
21 July 2010

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ITEM NO: 1

APOLOGIES

ITEM NO: 2

REPORT



TO Strategy and Community Committee
ON 28 July 2010
FROM Peter Vari – Manager: District Planning
Kathryn Martin – Consultant Planner
APPROVED BY Warren Maclennan – Acting Chief Executive

SIGNATURE *Warren A. Maclennan*

SUBJECT **RODNEY DISTRICT COUNCIL RURAL STRATEGY: HEARING OF SUBMISSIONS AND ASSOCIATED RECOMMENDATIONS**

FILE REF TP/9/70/1

PURPOSE OF REPORT:

<input type="checkbox"/> Information only	<input checked="" type="checkbox"/> Strategic decision	<input type="checkbox"/> Policy decision	<input type="checkbox"/> Statutory process
<input type="checkbox"/> Community issue	<input type="checkbox"/> Contract decision	<input type="checkbox"/> Delegation	<input type="checkbox"/> Appointment
<input type="checkbox"/> Administrative matter			

IMPLICATIONS:

(i)	Is this matter significant in terms of Council's Policy on Significance? No
(ii)	Implications in terms of Vision Rodney? Yes, this Strategy supports and builds upon the direction of Vision Rodney.
(iii)	Implications in terms of Long Term Council Community Plan / Annual Plan? The Rural Strategy is intended to influence future LTCCP's in the long term.
(iv)	Implications in terms of other Council Strategic documents or Council Policy? In the longer term the Rural Strategy will require changes to the District Plan.
(v)	Is a budget amendment required? No

(vi)	Have the views of affected or interested persons been obtained and is any further public consultation required?
	The views of a cross section of affected and interested persons have been obtained through a series of workshops with a Rural Strategy Reference Group and through a survey of 783 rural property owners. This agenda item reports on the results of consultation for the Rural Strategy, following three public open evenings where concepts from the Strategy were displayed and the publicly notified opportunity to make submissions was provided.
(vii)	Does a decision on this matter require Auckland Transition Agency approval? (yes / no / advice being sought?)
	No – Preparation of this strategy is a commitment under the existing LTCCP and Annual Plan and is a follow on from Council's adopted Planning Rodney strategy document. Although intended to inform future regional planning, it is not in itself a regional planning process.

FINANCIAL IMPLICATIONS:

Capital cost implications	None
Is it currently budgeted for?	Not applicable
Funding source of capital costs	Not applicable
Ongoing operational cost implications	Not applicable
Is it currently budgeted for?	Not applicable
Funding and rating impact (whether resulting from capital expenditure or arising directly)	Not applicable

1.0 SUMMARY:

A draft Rural Strategy has recently been completed. The Strategy is intended to guide planning in rural Rodney in a way that allows a wide range of rural activities to take place, while at the same time preserving the things that make this area special for those who live in it, those who visit it and those who use it for their livelihoods.

The Strategy is a high level strategic document which is intended to inform the Spatial Plan being compiled under the new Auckland Council. It provides a planning framework for the rural areas of the Rodney District going forward over the next 25 years. This strategy seeks to reach consensus on those issues which are important to the Rodney community, noting that there are many different issues/concerns to reconcile.

The Strategy was notified for public comment for five weeks and public consultation on the document occurred through the submission period.

This report summarises the feedback received, discusses the issues raised and recommends some changes to the draft Rural Strategy prior to adoption.

2.0 RECOMMENDATION:

- (a) That the recommended amendments to the draft Rural Strategy, identified in Appendix 7 to the agenda report, be endorsed.**
- (b) That the Rural Strategy, incorporating the amendments identified in (a) above, be adopted.**
- (c) That this Council recommend to the new Auckland Council that the Rural Strategy is an input to the Spatial Plan and subsequent Unitary Plan.**

3.0 Background

3.1 Reasons for the Rural Strategy

Preparation of a rural strategy for Rodney is one of the Council's key outputs listed in the current Long Term Council Community Plan (LTCCP) 2009 – 2019. The Rural Strategy is intended to guide planning in rural Rodney in a way that allows a wide range of rural activities to take place, while at the same time preserving the things that make this place special for those who live in it, those who visit it and those who use it for their livelihoods.

Rural Rodney is a highly diverse area and its individual elements, its growth pressures and the changes that are underway present particular issues that need to be provided for in a coordinated way to be managed successfully.

The existing approaches to managing these issues have been generally successful, however there are tensions between lifestylers seeking quiet, pristine rural environments and farmers and other business activities trying to make a living from rural production. Also, monitoring has shown some environmental outcomes in the rural area fall short of expectations.

Looking to the future, the Rural Strategy provides an opportunity to influence the new Auckland Council in preparing its Spatial Plan, LTCCP and new District Plan.

3.2 Consultation

The draft Rural Strategy was compiled incorporating the views of a cross section of affected and interested persons through a series of workshops with a Rural Strategy Reference Group and through a survey of 783 rural property owners. Following the compilation of the draft Rural Strategy, it was notified for public submissions for a period of five weeks (20 May 2010 – 21 June 2010). During this time three public open evenings were held, where concepts from the Strategy were displayed and Council staff were available for discussions. These open evenings were held at Warkworth on 25 May 2010, Helensville on 27 May 2010 and Orewa on 2 June 2010.

Consultation also occurred with iwi representatives, including a written invitation to consult being sent to :

- Ngati Whatua Nga Rima o Kaipara
- Te Uri o Hau
- Ngati Manuhiri
- Ngati Poao
- Te Kawerau a Maki

This resulted in discussions with Ngati Whatua Nga Rima o Kaipara and Te Uri o Hau. The comments of these parties are discussed in Section 4.9 of this report.

The Strategy was also made available to, and discussed with, Franklin District Council staff (as the other substantially rural Auckland Council) and Auckland Regional Council (ARC) staff as well as Federated Farmers' representatives.

Eighty-eight (88) submissions were received on the draft Rural Strategy. A full copy of these submissions will be available at the hearing and a summary of the submissions is attached to this report as **Appendix 1**. (*Note: full copies of the submissions will be available in the councillors' office*)

An issue was raised by a member of the public, that the submission form that was available to use to make submissions was very prescriptive and directive in the responses it sought. It should be noted that the use of the form for submissions was optional and was not a requirement. Further, it is noted that the Rural Strategy is an extensive document with a number of concepts, any of which could be commented on.

4.0 Consideration of submissions

The submissions will be discussed generally under the following topics, however, it should be noted that the Rural Strategy is intended as a high level document to guide future decision making in the district and, as such, matters of detail which are not appropriate in a high level strategy are not debated in depth in this report:

- (i) general support or opposition
- (ii) issues
- (iii) strategic imperatives (objectives)
- (iv) prioritising farming
- (v) mixed use rural areas
- (vi) expansion of small rural villages
- (vii) rural hamlets
- (viii) other comments
- (ix) consultation with iwi.

Following discussion, draft recommendations have been made in some instances, to amend the draft Rural Strategy. However, it should be noted that these draft recommendations have been made without the benefit of hearing the submissions, and changes to the recommendations may be required following the hearing of submissions.

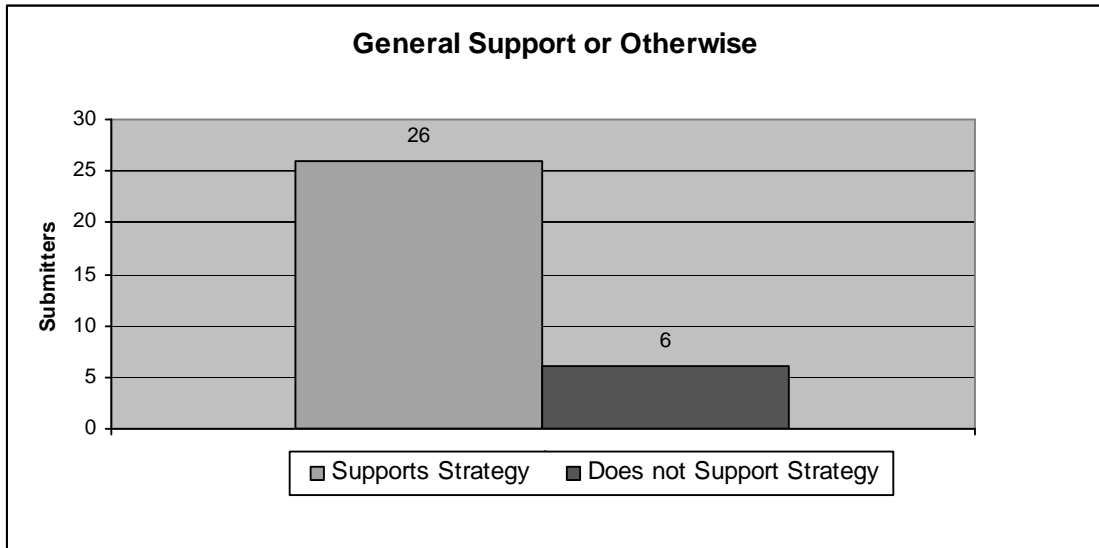
4.1 Submissions regarding: general support and opposition

4.1.1 Outline of submissions received

Although the submission form did not directly query submitters as to whether they supported the overall strategy or not, as a rough guide it appears that 26 submitters specifically stated that they supported the Strategy and six specifically stated that they did not. Obviously, other submitters generally supported or opposed the Strategy, however, they did not specifically comment in direct support or opposition.

There was a great range of comments provided, with the supportive comments including statements such as: “common sense prevails”, “broadly supportive”, “I agree with the general intent and direction of the Strategy”, “congratulations for achieving this rural strategy”, “overall a very logical and coherent strategy”, “I like the idea of handing over to the ‘Supercity’ a blueprint for rural Rodney that is easy for them to adopt”, “we strongly support the intentions of the document”, “strategy principles are excellent”, “overall, I think the Rural Strategy document is outstanding” and “...draft Rural Strategy should be introduced as soon as possible...”.

The comments that did not support the Strategy included statements such as “I wish to have the above changes enacted, or failing that the entire RDC Rural Strategy rescinded”, “waste of money”, “we have no confidence in RDC making any changes to the Rural Policy right now...”, and “the RSP has no political mandate and no communication with the various communities of interest has taken place”.



4.1.2 Discussion

Overall, the submissions indicated a general support for the Strategy. Subject to further explanation from those submitters in opposition to the Strategy at the hearing, it is recommended that the Strategy continue through the process to adoption, subject to further changes recommended later in this report.

4.1.3 Draft officer recommendation subject to hearing and Council's decision

Continue with the Strategy through to adoption.

4.1.4 Draft Amendments to the draft Rural Strategy subject to hearing and Council's decision

No changes are recommended as a result of the general submissions.

4.2 Submissions regarding: issues

4.2.1 Outline of issues

The Strategy has been prepared following a consultative process involving a Rural Strategy Reference Group, public opportunities for comment on the technical studies and a series of councillor workshops. From these processes it has been concluded that the rural area of Rodney District is large, varied and challenging in terms of the numbers and scale of issues raised by a Rural Strategy. As a high level strategy document, the Rural Strategy cannot (and nor is it appropriate to) address all of these issues in specific detail. The key issues identified for the Rural Strategy are:

- 1) The amount of subdivision opportunity and the effects associated with it
- 2) Threats to the sustainability and productivity of the rural economy
- 3) Development and environmental outcomes not matching expectations
- 4) Impacts of rates policy and regulations
- 5) Dis-benefits of subdivision for environmental conservation approach
- 6) Sporadic location of development
- 7) Overly general approach to environmental management
- 8) The need to foster and enhance local identity

4.2.2 Outline of submissions received

Overall, the submissions were generally supportive of and in agreement that the right issues have been raised. A number of non issue-related concerns were raised in this section of the submission form and, where possible, these have been addressed later in the report. It is not possible to outline all of the comments received, however, the following comments are reflective of many submitters or raised particular issues.

Issue 1

There was concern over non-notified non-complying subdivisions being lodged and processed, as well as concern over the removal of greenbelts around townships.

Issue 2

The submissions confirmed that threats to productive land due to subdivision and re-zoning were of concern.

Issue 3

A significant number of comments were received regarding issue 3 and the examples given of outcomes not matching expectations included: 0.5 hectare wetlands being too small for many wetland species to survive, poor monitoring of bush blocks and, similar to issue 1, a number of submitters raised concerns over non-complying activity applications being lodged and considered. In particular, one submitter considered that the "Resource Management Act (RMA) allows development as long as many promises are made in order to mitigate any negative impact on the affected community and/or individuals." The submitter then suggested that there were compliance issues if these promises were not kept and that these decisions could be irreversible and devastating.

Issue 4

Thirty-nine submitters considered issue 4, rates, to be a key issue for the Strategy and in particular unfair for farmers. Three submitters considered this not important and over emphasised.

Issue 5

Regarding subdivision for environmental conservation, this resulted in concerns in the submissions about poor quality 'pockets' of bush being protected having little real environmental value, the difficulty in monitoring after the subdivider had gone, conflicts that could result due to incompatible aspirations for rural living, (with those of farmers) and the increasing pressure on harbours due to subdivision. One submitter also noted the need for New Zealanders to foster an attitude of guardianship of our land rather than economic exploitation as being essential for our future.

Issue 6

With regard to the sporadic location of development, the majority of submitters were supportive i.e. confirmed that this was an issue, and concerns were raised with regard to the pressure on infrastructure such as "poor road maintenance, poor postal services, overflowing and blocked stormwater drains and streams that can't cope with average rainfall." The need for well planned and managed development was noted. However, a few submitters sought the opportunity for development under this issue.

Issue 7

This issue was accepted by most submitters as being appropriate.

Issue 8

There was a greater diversity of opinion in regard to issue 8 as many agreed that there was a need to foster and enhance local identity; however, some considered that this was not a Territorial Land Authority (TLA) function and that communities should look after themselves. It was also noted in submissions, that there was a need to accept that rural area local identities were changing and communities were adapting or moving on. Others considered that this identity already existed in Rodney and would be enhanced by successfully implementing the sorts of steps that the Rural Growth Strategy envisages.

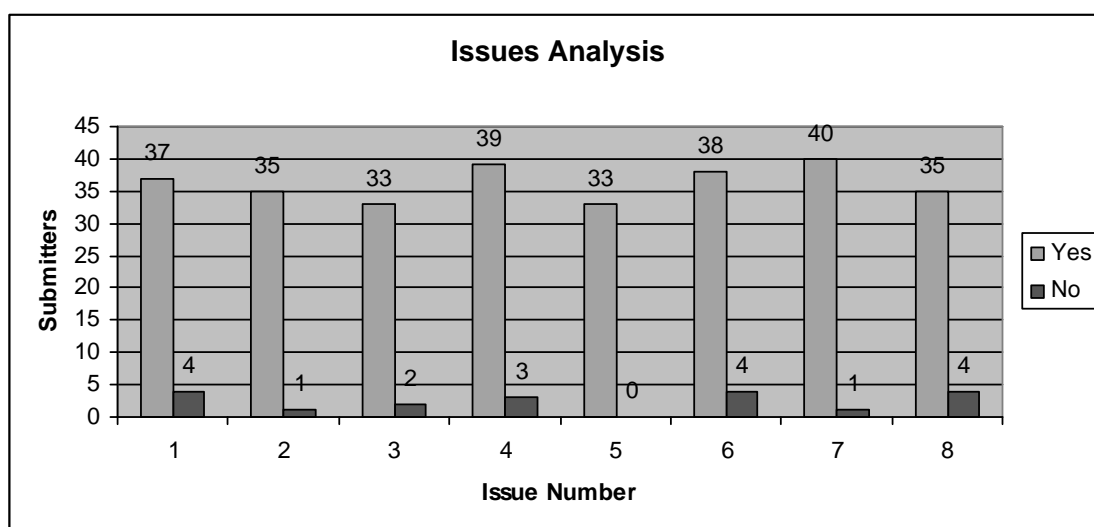
A number of new issues were suggested, however, as mentioned above, many of these were expressed as objectives rather than issues. The potential issues suggested are as follows:

- inability to subdivide unproductive rural land;
- potential loss of biodiversity and impacts on coastal areas through development pressures;
- sporadic development leading to levels of service declining due to infrastructure lagging i.e. metal roads and increased traffic;
- lack of ability to subdivide due to Council inhibitions;
- provision of efficient and economic infrastructure resources of the district (the New Zealand Transport Authority (NZTA))

4.2.3 Discussion

As shown in the bar graph below, all of the issues were strongly supported. It is considered that issues 1 – 7 should remain as stated due to the high level of support provided through submissions. Issue 8: *The need to foster and enhance local identity*, received a mixed response. It is accepted that communities change and that identity already exists. It is suggested that this issue be altered to read: *The need to acknowledge and support local identity*, as this provides greater acceptance of the fact the existing communities have an identity and also is slightly more empowering for the community itself rather than the Council.

With regard to the new suggested issues regarding the inability to subdivide, it is considered the inability to subdivide is not always an issue and in some circumstances, such as in sensitive areas, this may be a benefit. Also, to a degree, this is covered as a part of issue 1.



The suggested identification of an issue regarding sporadic development and infrastructure is accepted to the extent that the phrase: *and the effects associated with it*. should be added to issue 6. Furthermore, it is considered appropriate to include a new issue specifically addressing infrastructure, particularly due to the impact of development on roads and the clear concern surrounding this point in submissions. It is recommended that this issue statement read: *Development resulting in additional pressure on infrastructure, including roads*.

An issue statement was also suggested relating to biodiversity and coastal areas and it is considered that this aspect is not adequately reflected in the issues as presently stated. As such, it is recommended that the following be added as a new issue statement as Issue 10 to read: *Potential loss of biodiversity and impacts on coastal areas through development pressures*.

4.2.4 Draft officer recommendation subject to hearing and Council's decision

Section 3.7 *Key Focus Issues* be amended as stated in Section 4.2.5 below.

4.2.5 Draft amendments to the draft Rural Strategy subject to hearing and Council's decision

(i) Amend the Rural Strategy Section 3.7 *Key Focus Issues* as follows (additions underlined):

- 6) *Sporadic location of development and the effects associated with it*.
- 7) *Overly general approach to environmental management*.
- 8) *The need to ~~foster~~ acknowledge and enhance support local identity*.
- 9) *Development resulting in additional pressure on infrastructure including roads*.

10) Potential loss of biodiversity and impacts on coastal areas through development pressures.

(ii) Undertake consequential changes to the Executive Summary to reflect (i) above.

4.3 Submissions regarding: Strategic Imperatives (Objectives)

4.3.1 Outline of Strategic Imperatives (Objectives)

The consultation process undertaken to prepare the draft Strategy has identified things that people see as important – what we want. These are called ‘strategic imperatives’.

The imperatives identified are:

- 1) Viable productive land – for farming, horticulture, viticulture, forestry and other primary production enterprises
- 2) Quality landscapes – a country look and feel and quality development
- 3) Quality environments – well preserved and protected natural environments
- 4) Strong viable communities
- 5) A range of lifestyle choices
- 6) A well managed utility function
- 7) A well managed recreation function

4.3.2 Outline of submissions received

Imperative 1- viable productive land

The majority of submitters were supportive and it was noted that this imperative would be good for both the local and national economy. Some submitters did note the ‘patchy’ quality soils within Rodney, but nevertheless, supported the intent. Although supportive, one submitter did note that “Many viable productive land uses have detrimental effects on the environment and considerable consideration should be given before allowing such land use activities.” Further to this, it was queried what the definition of ‘other primary production enterprises’ was and one submitter suggested that it should not include light industrial.

One submitter noted that “land that is still large enough to be economically viable for primary agricultural/horticultural production should be preserved and not subdivided further” . This was a recurring theme within the submissions.

A few submitters did not support this imperative and one considered that priority should be given to the area’s cultural potential as ‘Auckland’s Playground’. Another suggested that “there is [are] huge amounts of farmland that (some) could be more productive as developed land i.e. subdivision/recreational”.

Imperative 2 – Quality landscapes

There was strong support for imperative 2, with a significant amount of concern over deteriorating landscapes from inappropriate subdivisions and developments in the rural area. In particular, one submitter raised concern over the loss of country look and feel from the Goodlands Estate Development (Dairy Flat) which the submitter considered “looks more like a slice of the suburbs dumped in the country and should be in the Countryside Living area”. Other submitters raised the point that “Quality landscapes must be a holistic concept and not a façade and to this end a few trees is not adequate mitigation for developments”.

Imperative 3 – Quality environments

This imperative was supported and some submitters emphasised that once quality environments were lost they were gone forever.

Imperative 4- Strong viable communities

Imperative 4 regarding strong viable communities did receive significant support, however, a number of submitters queried the Council's role in this respect, with one submitter stating "TLA responsibility is to set the framework residents want, not dictate outcomes or impose 'community' stuff". Although supportive, another submitter stated "... this must start by recognising the nature, the needs and the desires of the current community in each area, and then allowing sensitive development that enhances the existing community amenities".

Imperative 5 – A range of lifestyle choices

With regard to lifestyle choices, the majority of submitters were very supportive and it was noted that lifestyle choices were important to different sectors of community i.e. families, the elderly etc. Submitters recognised the need to provide a range of opportunities in this regard, however one submitter stated that "personal expectations must be limited in order to achieve the other desired outcomes".

A number of submitters saw this imperative as a way to "help to stop the haphazard development we have now. It will also help the rural property values to level out as opportunities to make a fast buck out of subdividing land diminishes in certain areas". While one submitter viewed this imperative holistically and stated that this approach "reduces commuting distances and benefits of this, thus local schools, shops and other services all play a part in reducing the overall environmental impact of people living in the rural area".

Some submitters were unclear as to what this imperative meant.

Imperative 6 – A well managed utility function

Many submitters were supportive of clear guidance on utilities, with many seeking that the Council "keep utility function in [the] Rural Production zone" and/or "be very clear where utilities can occur". The need to clearly identify future industrial land was noted by one submitter who stated "Yes. Also a very urgent requirement to establish identified industrial zones to stop the ad hoc, non-compliant industrial and semi-industrial development that goes on in the rural areas, particularly General Rural".

One submitter in particular was not supportive and suggested that if the utility "fits" into the local environment then "it will take care of itself" while others noted cleanfill and quarry examples in areas that have developed as lifestyle areas, causing conflict.

Imperative 7 – A well managed recreation function

There was general support for this recreation imperative, however very little comment. One submitter was unclear whether this imperative was referring to "football fields" or natural places and access, as the submitter was not so concerned about the latter.

General comments

General comments about the imperatives varied, with one submitter stating that the objectives had "worthy aims, but conflicts between them" and suggested that the document be relied on as a whole.

Federated Farmers sought that the imperatives be enabling rather than directive.

One group of submitters stated that they supported policies and objectives in a rural strategy for Rodney that perpetuate and strengthen protection of the ecological, landscape and amenity values of the coastal environment and the "ruralness" of the landscape beyond.

A few submitters did not support any of the imperatives, with one submitter stating that "Council should not impose restrictions on rural Rodney".

A number of new imperatives were suggested. The potential imperatives are as follows:

- protecting natural features
- Aquaculture
- "provision of efficient and economic infrastructure as cornerstone of all growth scenarios considered for the rural area" (NZTA)
- "heritage should be addressed" i.e. Kumeu-Huapai wine trail.

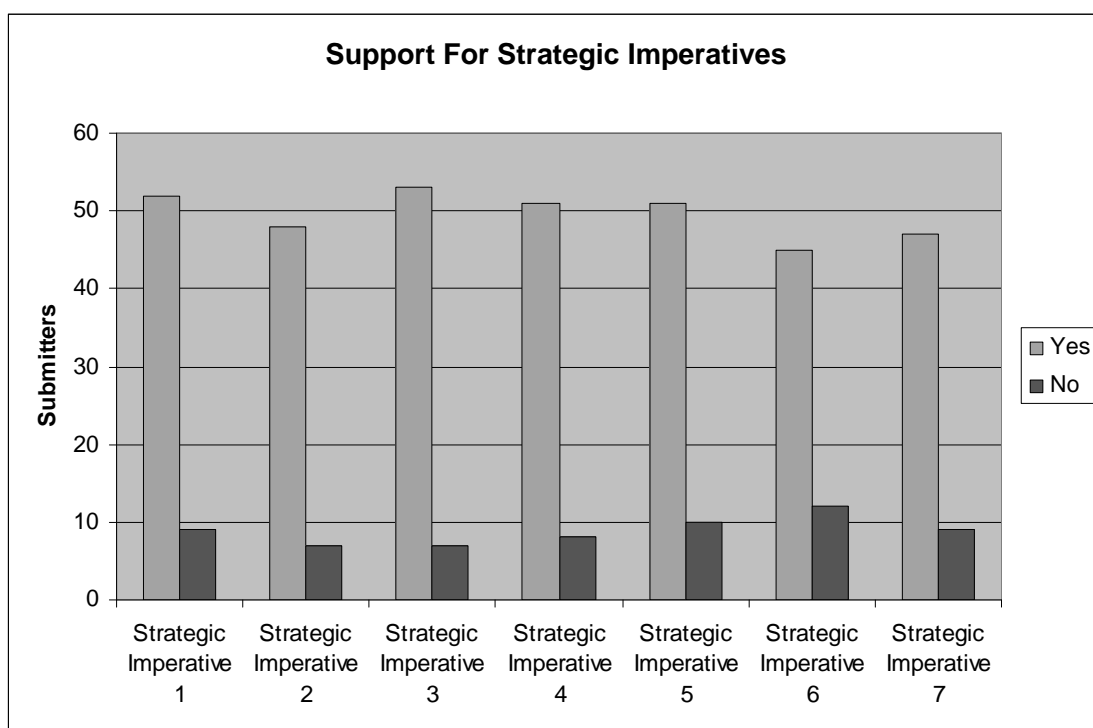
4.3.3 Discussion

As demonstrated in the bar graph below, there was significant support for all of the strategic imperatives within the Strategy. As such, it is recommended that imperatives 1 – 3 are retained. Imperative 4, regarding strong viable communities, was queried in terms of the Council's role in this objective. It is considered that the Council is charged with providing the tools for communities to be strong and viable, this may include things such as infrastructure i.e. roads and services, facilities and where appropriate, employment land. It is recommended that imperative 4 be retained.

Imperative 5, regarding lifestyle choices, refers to the provision of land for lifestyle living in specifically identified areas such as the Country Living and Mixed Rural Environments and the Bush Living Areas. It is recommended that this imperative be retained given the level of support demonstrated.

Imperative 6, although widely supported, resulted in some confusion over what a 'utility function' was. A utility function is defined in Footnote 2 to the Strategy as follows: *The utility function describes the role Rural Rodney is inevitably asked to play in the region for schools, mining of resources, the disposal of waste and cleanfill and the placement of utility sites (power, water, wastewater and telecommunication sites and routes).* (refer page 9 Draft Rural Strategy). It is accepted that the inclusion of *schools* within the definition could be adding some confusion and as such it is recommended that this be removed from the above definition and that the imperative remain.

It is recommended that imperative 7 recreation remain in the Strategy.



Four new imperatives were suggested in the submissions and these imperatives require consideration. The first being the protection of natural features. To some extent this is covered in the imperative: *Quality environments – well preserved and protected natural environments* along with *Quality landscapes – a country look and feel and quality development*. When read in isolation, neither of these imperatives quite adequately covers the objective of protecting natural features. However, it is considered that when read together, they sufficiently cover the protection of natural features as a natural feature is a landscape and a natural environment. Therefore no additional imperative is necessary.

With regard to the inclusion of aquaculture as an imperative of the rural strategy, it is considered that although it is accepted that aquaculture is a priority area in the Council's Economic Development Strategy, it is inappropriate to single out this activity as an objective in the rural strategy. It is covered under imperative 1 – viable productive land.

It is accepted that the imperatives for the rural area should refer to the provision of appropriate infrastructure to serve communities, as requested in submissions. This is particularly focused on roading infrastructure, although not exclusively, and it is recommended that imperative 4 be amended to recognise the role of *...efficient and effective infrastructure* in supporting strong viable communities.

With regard to the insertion of *heritage* into the objectives, it is accepted that this is relevant to the Strategy and it is also recognised that there are no imperatives addressing the issue of local identity. It is recommended that Imperative 4 be amended to recognise the role of *...cultural heritage* in supporting strong viable communities. Comments on this imperative are welcomed at the hearing.

4.3.4 Draft officer recommendation subject to hearing and Council's decision

That imperatives 1 – 7 remain in the Strategy under Section 4.1 with the amendments outlined below in Section 4.3.5.

4.3.5 Draft amendments to the draft Rural Strategy subject to hearing and Council's decision

Amend the Rural Strategy Section 4.1 *Achieving strategic imperatives* as follows (additions underlined, deletions struck through):

- (a) Amend footnote² to read: *The utility function describes the role Rural Rodney is inevitably asked to play in the region for ~~schools~~, mining of resources, the disposal of waste and cleanfill and the placement of utility sites (power, water wastewater and telecommunication sites and routes).* (refer page 9 Draft Rural Strategy).
- (b) Amend imperative 4 to read *Supporting Strong Viable communities – by supporting local cultural heritage and by providing efficient and effective infrastructure.*
- (c) Undertake consequential changes to the Executive Summary to reflect (b) above.
- (d) Undertake consequential changes within the strategy document to reflect (a) above.

4.4 Submissions regarding: Prioritising farming

4.4.1 Outline of submission form question

The submission form sought input on the proposed prioritising of farming in the Rural Strategy. This question was phrased as follows:

The Draft Rural Strategy proposes to prioritise rural farming and rural production in some areas, which may restrict some non – farming activities and subdivision. Do you support this approach? Yes / No (Please circle) Why?

4.4.2 Outline of submissions received

Submissions supportive of prioritising farming

The question of whether to prioritise farming raised a number of responses diverse in nature. There were many submitters who supported prioritising farming, consider the subdivision of productive land as unsustainable, consider that production activities need to be protected and that “non-farming activities and ad hoc subdivision in rural areas impacts on the long term viability of the rural economy.” One submitter stated that “those areas that are currently characterised by large scale commercial farming or rural production properties need the freedom to operate without restrictions which should apply for other areas which are predominantly rural residential.” Some submitters saw the potential of this approach to “... lessen the potential for conflict with residents who do not appreciate the industrial nature of farming and intensive rural production activities.” However, with this support, arose some concern over the following issues:

- “..that quarries and cleanfills are able to locate in the Rural Production area”;
- “unproductive land and small blocks of land should be opened up to subdivision;”

- that there be no industrial development in rural areas;
- that activities such as hamlets should not be precluded from occurring elsewhere in the district i.e. in the Rural Production areas;
- concern over the removal of any existing subdivision provisions, although transferrable title rights (TTRs) were supported;
- that if subdivision was limited in the Rural Production Environment, that it was prioritised elsewhere;
- concern that prioritising farming did not mean that these properties were not subject to good environmental management such as fencing, planting or protecting riparian margins, with incentives.

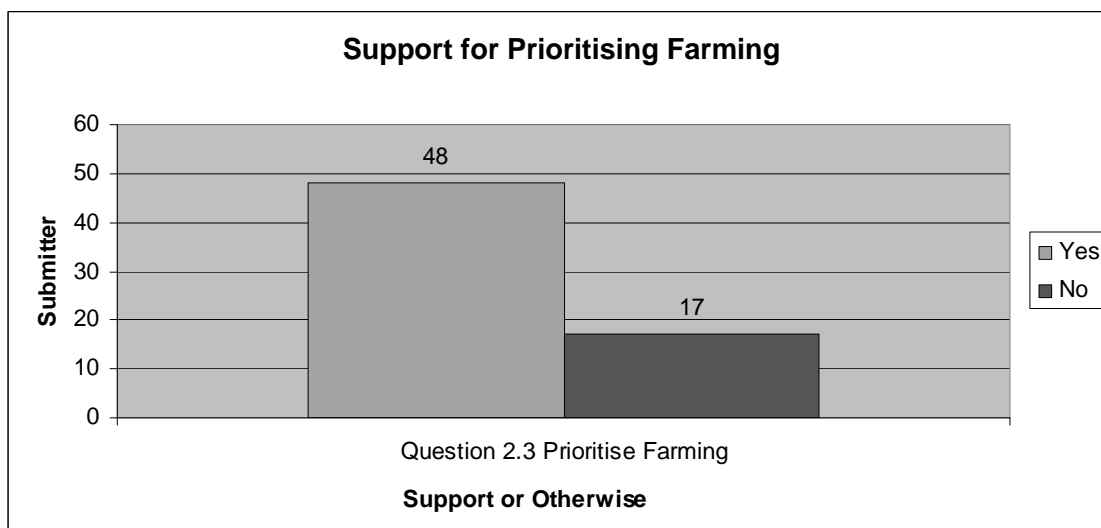
Submissions unsupportive of prioritising farming

A number of submitters were unsupportive of prioritising farming for a variety of reasons. One of the recurring themes was the fact that there were unviable areas of land unsuitable for Rural Production and that "Rural productivity does not usually equate to rural viability". One submitter stated that "Council cannot dictate or foresee the sustainability and profitability of any rural production". Other concerns raised were as follows:

- one submitter was opposed to the prioritising of rural farming and rural production and considered that "lifestyle blocks were able to be sustainable with on site food production as opposed to the 'food miles' created from large production along with overstocked, overgrazed and over-fertilized farms." The submitter saw "...the separation of farms and lifestyle blocks as unnecessary at best, and counterproductive at worst"
- "too general in concept. Some rural subdivision on poor land not suitable for agriculture is acceptable"
- one submitter suggested that rather than prioritising farming, rural residential sites be kept under one hectare, with rules requiring subdividers to use the less productive parts of the land where practically possible. Clustering of sites was also suggested
- a submitter suggested that "limiting non farming activities will only drive prices higher making farming less profitable"
- "situations change and each individual approach should be considered"
- "it is inappropriate to make such arbitrary approaches – rather more work needs to be done to actually identify particular qualities, landscapes, landuse patterns, ecological features etc."
- with regard to Parakai in particular one submitter stated that "No. Farming in Parakai area is hardly of any consequence. It is better to prioritise development of low value farm land in areas adjoining townships."
- concern over what the definition of 'primary production' was and whether it included industries
- one submitter was both supportive and unsupportive due to some areas containing both tourism and viable farms for example. The submitter stated that "Zoning must recognise and protect the reality of the current communities and their activities."

4.4.3 Discussion

As demonstrated by the bar graph below, the majority of submitters supported the approach in the Strategy of prioritising farming, resulting in additional restrictions in the Rural Production Environment.



With regard to subdivision, it is not proposed in the Strategy to remove all rights to subdivision. Rather, the Strategy proposes to take a more tailored approach and 'tighten up' these provisions by increasing the required environmental benefit that will trigger the ability to apply for a subdivision. It is also proposed in the Strategy, to provide alternative locations for subdivided sites by way of increasing areas in which transferrable title rights may be used. It is not the intention to prohibit hamlets within the Rural Production Environment. Should hamlets be adopted as an approach in the Strategy, they would be required to be located within a radius of a village, regardless of the underlying environment.

As stated above, many of the submitters objecting to this approach were concerned that some areas were not viable for farming and as such, these areas should be able to diversify or subdivide. The intent of the Strategy is to identify those areas of Rodney with larger blocks that are predominantly utilised for farming purposes and identify these as Rural Production. It is accepted that there are small pockets of lifestyle activities within the Rural Production Environment. However, it is not feasible to have a site by site zoning pattern and, in order to prioritise farming, a clear line must be drawn to demarcate the area for rural production.

Some submitters suggested that more work needed to be done to identify particular qualities, landscapes, ecological features etc. The Strategy proposes that further landscape work is completed for the greater Auckland area to agree and define those significant landscapes and ecological features etc for any future implementation work such as plan changes. To address this it is recommended that a note be added to Figures 13, 14 and 15 (Pages 32-34 Draft Rural Strategy) to emphasise that *Outstanding Landscapes and Ecological Areas will require further analysis and may result in additional controls.*

With regard to the submitter's suggestion that limiting activities would drive property prices higher, it could also be said that restricting the potential for some activities to occur in the Rural Production Environment would have the opposite effect and moderate price rises by reducing the pressure on farmers to develop non farming activities on their land.

A number of submitters were concerned about the potential for non-rural activities to establish in the Rural Production Environment, particularly industrial activities. It is the intention of the Strategy that many activities be restricted to enable farming to be the key activity in this environment. It is recommended that a statement be added to the *Rural Production Environment* Section of the Strategy (page 22 Draft Rural Strategy) to this effect.

Overall, taking into account the submissions regarding prioritising farming, it is considered that the approach proposed in the Strategy is appropriate and should be retained intact.

4.4.4 Draft officer recommendation subject to hearing and Council's decision

That the approach of the Strategy to prioritise rural farming and rural production should be retained and that the amendments outlined in section 4.4.5 be made.

4.4.5 Draft amendments to the draft Rural Strategy subject to hearing and Council's decision

Amend the Rural Strategy Figures 13, 14 and 15 Pages 32-34 as follows (additions underlined):

- (a) Insert a note on each Figure to state: Outstanding Landscapes and Ecological Areas will require further analysis and may result in additional controls.
- (b) Amend the *Rural Production Environment, HOW COULD THIS BE DONE* Section, Page 22, to insert the following: Farming permitted No consents needed for farming...production. Non-rural activities should be restricted to enable farming activities to dominate in the Rural Production Environment.

4.5 Submissions regarding: Mixed Use Rural Areas

4.5.1 Outline of submission form question

The submission form sought input on the proposed Mixed Use Rural Areas in the Rural Strategy. This question was phrased as follows:

The Draft Rural Strategy proposes to identify mixed use rural areas, which include good quality soils and areas that have generally already been modified (e.g. for subdivision, development and/or rural businesses) and to make these areas available for a range of uses, including non residential uses such as businesses or tourism and rural residential living with certain controls. Do you support this approach? Yes / No (Please circle) Why?

4.5.2 Outline of submissions received

Submissions supportive of the Mixed Rural Environment

The vast majority of submissions received indicated support for the proposed Mixed Rural Environment Approach. This approach was considered to have the following benefits by submitters:

- “further development within these areas will take the pressure off more rugged rural areas which will be allowed to maintain their natural character and beauty”
- “infrastructure planning can be tailored to meet the development requirements”
- it reduces adverse effects because development would occur in appropriate locations
- it takes the pressure off areas currently in use for farming and forestry and avoids conflict of interest
- it prevents lifestyles being subjected to a gradual lowering of level of service
- lifestyle subdivision in the mixed rural zones will ensure that the tensions between lifestyle and production activities are minimised
- support for TTRs to be used in the Mixed Rural Environment
- “it provides capacity for non-agricultural and utility businesses”
- “this approach makes sense as it avoids the pitfalls of treating all areas as the same, thus stifling innovation and vitality”
- “future development can be well controlled to create attractive communities” where horticultural production or intensive farming is not viable

- “sensible approach” and “good planning”
- “tourism is extremely important and should be prioritised”
- provides a “...step between rural production and countryside living zones”

As a part of the submissions in support, a number of key concerns were raised. A recurring theme in submissions was the need to carefully and decisively restrict certain activities within the Mixed Rural Environment. In particular, quarries, cleanfills, landfills, business such as car wrecking, engineering, spraypainters and industrial activities were of concern. Additionally, the need to maintain rural character and protect landscapes was noted, along with the need to preserve wetland and bush in areas that were already heavily subdivided.

A number of submitters also supported the concept of Mixed Use but requested that this not be within the Waiwera Valley.

A number of submitters requested that the minimum site size provided for was one hectare and in some instances the potential environmental benefits of covenanting ecological linkages were noted as the reason.

An alteration of the Mixed Rural Environment rather than the Rural Production Environment was sought so that it encompassed Huapai, Kumeu, Riverhead and Taupaki.

Submissions unsupportive of the Mixed Rural Environment

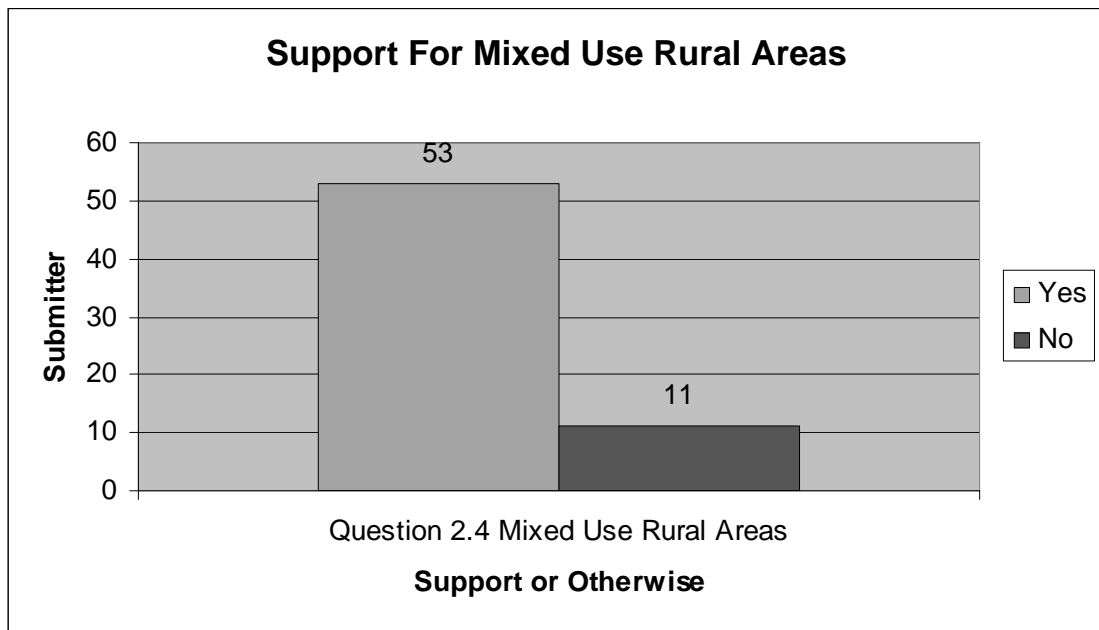
The main concern of those submitters opposed to the introduction of a Mixed Rural Production Environment approach was the removal of “good productive land and the production of more uneconomically viable land areas.” Other concerns were as follows:

- “the aim is to relieve the proposed Mixed Rural Environment from population and development pressure, which already has diminished the quality of life here rather than increase the pressure”
- “it is inappropriate to identify and promote such areas as providing an appropriate location for lifestyle development and other sensitive activities where regionally significant aggregate resource exist, or along access routes serving such resources. Including such areas within a Mixed rural activity area, as is the case with Flat Top and Wainui”
- “these activities are not necessary in our area Te Arai/Tomarata being rural”
- “...mixing industrial and residential areas does not serve either category well”
- “this will create wealthy and poor areas – such an approach will create privileged areas”
- assumes farming is an economic activity, although there is very little ‘good quality’ land
- several existing poultry operations are within the Mixed Rural Environment. The Poultry Industry Association had concerns that the future subdivision potential in these areas would drive property prices up and make farming uneconomic in the long term. The association was also concerned that the lifestyle preferences of block owners would take precedence over primary production activities, such as quarrying, cleanfilling and intensive farming. More detail was sought around this matter.

4.5.3 Discussion

The proposed Mixed Rural Production Environment is a new concept for Rodney District and is key to the providing for growth and entrepreneurial activities, while ensuring that these are carefully controlled or mitigated and the Rural Production Environment is kept available for rural production activities.

The majority of submitters supported this approach, as demonstrated on the bar graph below. However, there were a number of concerns to be addressed.



Significant concern has been raised about the potential for utility sites to be located in Mixed Use Environments. Some sites are currently located in the proposed areas and this is demonstrated by the map attached as **Appendix 3**, showing the proposed Environments with the 'utility sites and resources overlay' imposed on the map.

It is necessary to accept the reality of utility sites in the district as required resources or functions and manage their effects. It is considered that where possible, those significant utility sites should be excluded from the Mixed Rural Production Environment through alterations to the mapping where possible. Where it is not possible to exclude utility sites, the wording around *Utility development* (page 26 Draft Rural Strategy) should be strengthened to make it clear that, although extensions to existing utility sites may occur with mitigation, new utility sites such as quarries and cleanfills in this environment will be discouraged. However, this area is proposed as a 'production' environment and intensive farming activities should be anticipated. Alterations to the text on Page 26 of the Strategy should be undertaken to acknowledge this. It is noted that a future possible aggregate resource near Waitoki is identified on the utility map (Figure 9) within the Mixed Rural Production Environment, as noted on Figure 34. This area has diversified into a level of lifestyle living and due to the utility being a potential resource only, the Mixed Rural Production Environment has been retained in this area.

With regard to the queries about Waiwera Valley, this is not proposed as a Mixed Rural Production Environment as shown on Figure 13 of the Strategy.

Some submitters have suggested a smaller site size than the proposed four hectare minimum. The Rural Strategy is intended as a high level document and details such as site sizes will be resolved at a later date through District Plan processes. However, four hectares has been suggested as a guide to enable some agricultural use and retain a rural look and feel to these production areas. At this stage therefore it should be retained. It will also help to lessen the potential for tensions between different uses.

With regard to some submitters concerns about industrial activities in the Mixed Rural Production Environment, it should be noted that some small scale activities may establish where the effects of these can be avoided or mitigated.

It should be noted that due to the 'high level' concept approach of the Rural Strategy the detailed extent of different mapped areas will need to be confirmed before being implemented through district plan processes. For example some areas shown as Mixed Rural Production

Environment may be flood sensitive and downstream effects could occur. It is recommended that a note to this effect be imposed on Figures 13, 14 and 15 of the Strategy.

4.5.4 Draft officer recommendation subject to hearing and Council's decision

That the approach of the Strategy to introduce Mixed Rural Production Environments be retained and that the amendments outlined in section 4.5.5 be undertaken.

4.5.5 Draft amendments to the draft Rural Strategy subject to hearing and Council's decision

(i) Amend the Rural Strategy Figures 15 Page 34 to exclude some existing utility sites from the Mixed Rural Production Environment as shown in **Appendix 2**.

(ii) Amend the Rural Strategy Figures 13, 14 and 15 Pages 32-34 as follows (additions underlined):

(a) Insert a note on each Figure to state Due to the 'high level' concept approach of the Rural Strategy the detailed extent of different mapped areas is indicative rather than definitive, and the detail will need to be confirmed before being implemented through District plan processes. For example better definition of constraints such as flood hazard/sensitivity may result in changes.

(iii) Amend the Rural Strategy text as follows (additions underlined, deletions struck through)

(a) Amend Page 26, *Mixed Rural Production Environment* to alter the following:

Utility development

Although extensions to existing utility sites may occur with appropriate mitigation, new utility sites such as ~~Cautious approach to activities like major quarrying and clean filling should be discouraged~~ and intensive farming operations acknowledging the expectations of lifestyle activities in the area.

(b) Amend Page 26, *Mixed Rural Production Environment* to alter the following:

Farm diversification

Reconsider the need for...and leisure facilities. Acknowledge that the Mixed Rural Environment is a 'production' environment and intensive farming activities should be anticipated.

4.6 Submissions regarding: Growing Rural Communities

4.6.1 Outline of submission form question

The submission form sought input on the proposed expansion of small rural villages in the Rural Strategy. This question was phrased as follows:

The Draft Rural Strategy identifies some opportunities to allow the expansion of small rural villages or settlements for example by making additional land available to permit limited development on the fringes of these settlements. Do you support this approach? Yes / No (Please circle) Why?

4.6.2 Outline of submissions received

Submissions supportive of the expansion of small rural villages

There is strong support for the expansion of rural villages as a method for managing growth without further subdividing Rural Production land. The key themes in submissions were that this approach is the best use of existing infrastructure such as schools and will "...boost these local communities and provide locally based business opportunities." In addition to schools and community halls "Some expansion will assist in having sufficient population for local retail e.g. local store, perhaps a chemist or vet". Many submitters also noted that providing for logical settlement expansion concentrated the effects of urban development and minimised journey length. However, a significant concern was that any expansion needed to be supported with careful controls and clearly defined limits.

Some other specific comments were as follows:

- need to allow for different forms of settlement expansion depending on topography, roads and other physical limitations
- “it keeps potential adverse effects contained in small areas and will increase the sustainability of rural communities, providing more local jobs and other benefits”
- suggested larger lots in ‘bands’ surrounding the villages, determined through the structure plan process rather than “broken down land up side roads”
- supported, provided that walkways and recreation facilities were provided
- requested limits to the size of small coastal villages with preference given to inland settlements
- “only allow developments to service the rural community. Farming goods and service facilities/schools/preschools/halls. There should also be small parcels of land available for the employees of such rural services”
- “...good planning process”
- supportive of the concept and seeks this approach around Kumeu village
- will enable young people to live and work in an area that they have grown up in. “Creating townships builds communities”
- new forms of settlement should encourage a reduction in the dependency on cars for local travel and facilitate the use of alternative modes of transport due to a more “compact form”
- “rural villages will benefit from additional development to ensure that these areas are encouraged and maintained as vibrant independent communities”.

Submissions unsupportive of the expansion of small rural villages

There were very few comments provided to explain any opposition to the proposed expansion of small rural villages. However, the following was stated:

- inconsistent with existing structure plans
- “loss of rural village [in] which we choose to live”
- unsupportive of “...a blanket approach to this issue. Each case must be considered on its merits and preferably be covered by a structure plan”.

4.6.3 Discussion

A number of submitters who were supportive of the expansion of rural villages outlined the positive benefits of this approach, including but not exclusively, potential increase in services, creation of vibrant communities and reduction in car dependence.

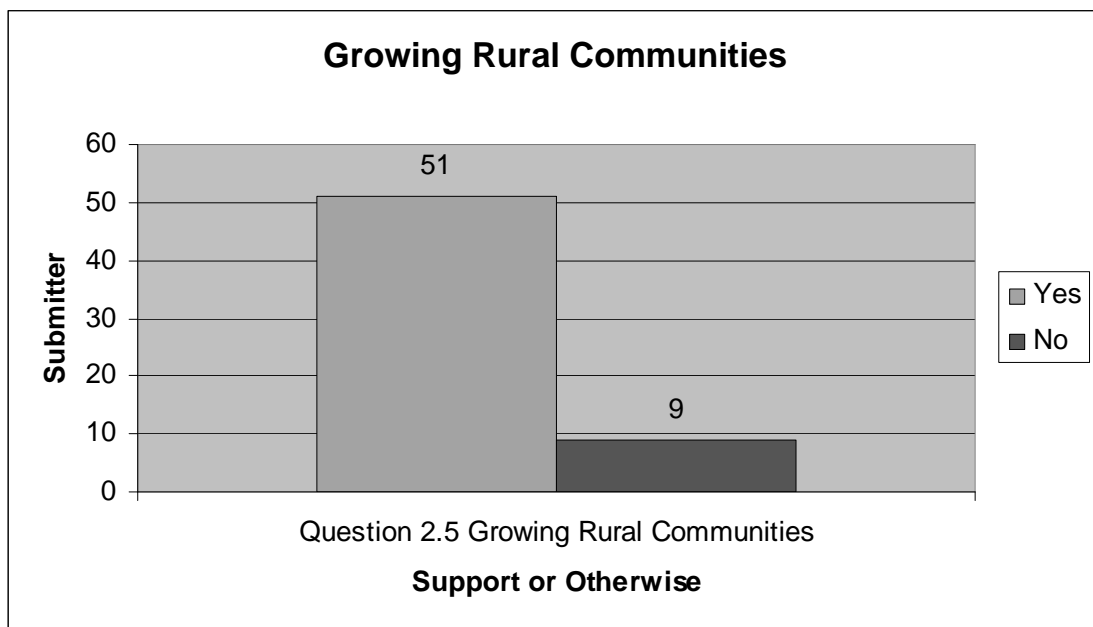
It is has become apparent through the submissions that there is support for not only ‘expansion’ but also ‘diversification’ of rural villages. A number of submitters suggested that the opportunity for employment and or a shop or two would strengthen communities. This is the intent of the Strategy, although this diversification does not always require expansion. This concept is supported by Planning Rodney which refers to some rural community service villages in which:

Council may consider limited residential expansion in some cases, but only within defined village limits to prevent any ‘blurring’ of town and country. The Council generally will not consider or carry out major infrastructure installation or expansion. Water and wastewater servicing will be carried out on-site. (Page 31, Section 3.5.3 Planning Rodney).

The process of diversification has occurred, for example in Waitoki, where a process of creating a 'vision document' was undertaken and as a result there was no real expansion of the village extent, but rather a rezoning within it. It is recommended that this diversification be recognised more clearly in the Rural Strategy through an alteration to the wording in Section 5.3.2 Key Initiatives – Growing Rural Communities, *HOW COULD THIS BE DONE*, page 39 to read: *In many instances it may be appropriate to diversify existing land within a village to accommodate a wider range of land uses such as café's or general stores, as opposed to expanding the village.*

Although the significant majority of submitters supported this approach, as shown in the bar graph below, some concern was raised about the need to ensure that careful controls were placed on any expansion and that there were defined limits. These controls and limits are essential to any expansion and it is considered that uncontrolled sprawl would be contrary to the intent of the Rural Strategy. Prior to any expansion, the Rural Strategy recommends that a structure plan process be entered into. This process and any subsequent plan change process would provide for public input into matters such as appropriate locations for expansion, and the density and other controls that should be imposed. To ensure that this is clear in the Strategy, it is recommended that an additional sentence be added to Section 5.3.2 Key Initiatives – Growing Rural Communities, *HOW THIS COULD BE DONE* which would state: *Prior to the expansion/diversification of any of the above rural community service villages, a structure plan process or process of adopting a 'community vision' should be undertaken to determine the extent, location, density and any key controls appropriate to the proposed expansion/diversification within physical and infrastructure constraints.*

With regard to the submissions in opposition, it is considered that the structure plan/community visioning approach addresses these concerns.



It has also been noted that text surrounding this concept in the Rural Strategy document is unclear in part and is slightly ambiguous. The sentence in question in Section 5.3.2 Key Initiatives – Growing Rural Communities, *HOW THIS COULD BE DONE*, *Planning Rodney sets out a rigorous case for focusing growth management in Matakana, Snells Algies, Puhoi, Waiwera, Kaukapakapa, Huapai and Riverhead in the first instance which Rodney District Council has responded to by resourcing structure planning and statutory plan changes.* The intent of this sentence was to outline that these are 'towns under pressure' which, while they may be considered for some further growth, will require a precautionary management focus and as such may not be suitable for expansion. It is recommended that the above sentence be reworded to reflect this.

It is also noted that Figures 13, 14, and 15 do not reflect the potential expansion/diversification of the identified villages being: Kaipara Flats, Tomarata, Coatesville, Pakiri, Tapora, Tauhoa, Wainui, Dairy Flat, Taupaki and Waitoki. It is therefore recommended that a 'star' or other notation be added to reflect this component of the Strategy.

Given the above discussion, it is recommended that with the clarifications recommended, the approach of expansion/diversification of/to rural villages should remain in the Rural Strategy.

4.6.4 Draft officer recommendation subject to hearing and Council's decision

That the approach of the Strategy to accommodate growth through the expansion/diversification of rural villages be retained and that the amendments outlined in section 4.6.5 be made to the Strategy.

4.6.5 Draft amendments to the draft Rural Strategy subject to hearing and Council's decision

- (i) Amend the Rural Strategy text as follows (additions underlined, deletions struck through):
- (a) Insert the following sentence at the end of Section 5.3.2 *Key Initiatives – Growing Rural Communities, HOW THIS COULD BE DONE* that reads: *Prior to the expansion/diversification of any of the above rural community service villages, a structure plan process or process of adopting a 'community vision' should be undertaken to determine the extent, location, density and any key controls appropriate to the proposed expansion/diversification within physical and infrastructure constraints.*
 - (b) Amend the following sentence in Section 5.3.2 *Key Initiatives – Growing Rural Communities, HOW THIS COULD BE DONE*, to read as follows: *Planning Rodney sets out a number of 'towns under pressure' that require a precautionary management focus and as such may not be suitable for expansion, these include rigorous case for focusing growth management in Matakana, Snells Algies, Puhoi, Waiwera, Kaukapakapa, Huapai and Riverhead in the first instance which Rodney District Council has responded to by resourcing structure planning and statutory plan changes.*
 - (c) Amend Section 5.3.2 *Key Initiatives – Growing Rural Communities, HOW COULD THIS BE DONE*, page 39 to read: *In many instances it may be appropriate to diversify existing land within a village to accommodate a wider range of land uses such as café's or general stores, as opposed to expanding the village.*
- (ii) Amend Figures 13, 14 and 15 of the Rural Strategy to identify Kaipara Flats, Tomarata, Coatesville, Pakiri, Tapura, Tauhoa, Wainui, Dairy Flat, Taupaki, Waitoki and Woodhill as subject to potential village expansion and/or diversification.

4.7 Submissions regarding: rural hamlets

4.7.1 Outline of submission form question

The submission form sought input on the proposed rural hamlets in the Rural Strategy. This question was phrased as follows:

One of the ideas set out in the Draft Rural Strategy is to permit rural hamlets. These are small settlements located within 3km of existing villages. Do you support this approach? Yes / No (Please circle) Why?

4.7.2 Outline of submissions received

Submissions supportive of rural hamlets

Submitters appear to be quite divided regarding the concept of hamlets, many submitters considered that there were significant positives to this approach as follows:

- may take the pressure off areas of high landscape value
- “provides for environmental protection but keeps effect in areas where they already exist. A sensible option”
- consolidates the effects of countryside living built form and maintains open space and productive activities while providing an alternative lifestyle form

- provides alternative lifestyle opportunities in safer communities without the need to maintain larger lifestyle blocks
- "...ideal model to confine residential developments in rural areas"
- creates a sense of community between residents while maintaining large semi productive rural areas
- the strategic rearranging of rural titles into a more compact form is seen as a potential tool for addressing sustainability issues in rural areas.

These submitters, while supportive, did have concerns regarding the detail of hamlets. In particular there were concerns that hamlets did not rapidly expand into small towns, that they should not appear to be 'ring fenced' and that there be a gradual blending from a more urban intensity, through a band of lifestyle size properties to the surrounding rural land.

The three kilometre limit from existing villages was suggested as appropriate by some submitters and unnecessary by other submitters. Many suggested the location of hamlets should be close to towns or villages that have reticulated services, although one suggested that they should be self contained. The general theme of submissions was that hamlets should be located only "...where appropriate, and where it does not alter the existing environment look and feel beyond that which is reasonable for the local community" .

Walking and cycling tracks linking hamlets to the villages were also requested and a submission was also received requested that the name 'Hamlets' be altered.

One submitter (ARC) suggested "significant design work is required prior to the identification of suitable locations". Another suggested a trial of hamlets.

Submissions unsupportive of rural hamlets

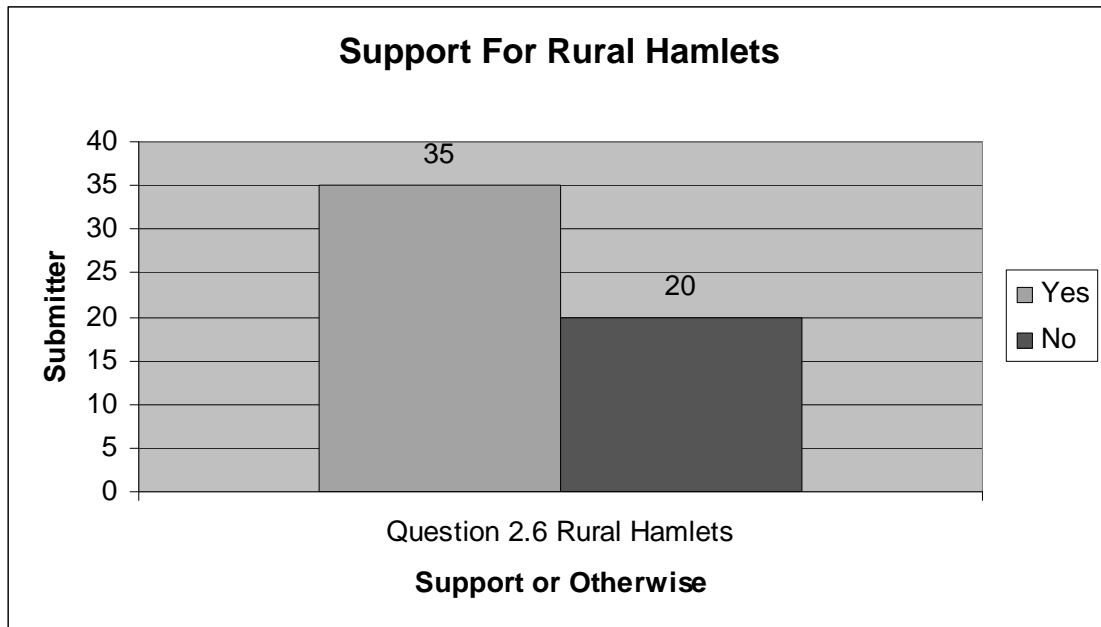
There were a number of concerns raised regarding hamlets as a concept. However, the two recurring issues were the increase in car reliance and the impacts of infrastructure in this respect; and the concern that hamlets would effectively create rural sprawl.

Concerns raised by individual submitters included the following:

- hamlets were inconsistent as an attachment or an addition to a more normal rural village
- hamlet approach was too general in concept, needed a more definitive approach
- concerns regarding hamlets at Tomarata and queries on any research regarding this
- it was more appropriate to expand rural villages rather than provide for hamlets
- "hamlets so close to villages would encourage the space between to be filled"
- concern that lots would involve 'prime producing lots' and not identify with existing settlements, nor contribute to their economic health and sense of community
- would lead to piecemeal development with undesirable results and the potential for problems with body corporates
- design of the approach to hamlets should be as a part of the "strategic assessment of the region which again will occur during the preparation of the Spatial Plan."

4.7.3 Discussion

The submissions received regarding the concept of rural hamlets were mixed, as shown in the bar graph below.



The distance of hamlets from rural villages, which was suggested as three kilometres, was queried. This distance is effectively a suggested starting point and in reality, the distance that hamlets should be located from rural villages is really dependant upon whether the subject site is a part of the village catchment. This is very subjective, however, the suggestion around hamlets is that their occupants should be sufficiently close to identify with a particular village even if they were physically detached from it by, for example, a river or landscape form, by sheer distance, or by being physically closer to another village. These factors would all play a part and would be different for each village and could be determined through either the structure plan process or some other public consultation process.

It is recommended that Section 5.3.3 *Key Initiatives – Provide For Rural Hamlets Around Suitable Existing Centres, HOW COULD THIS BE DONE*, be altered to reflect this determination by inserting the following sentence: *No hamlet development should occur without a public consultation process, be it a structure plan process or other initiative prior to the notification of a plan change, to define whether hamlets are appropriate for specific villages and if so the potential ‘limits’ within which hamlets could occur around existing villages.*

The above mentioned process should also address opportunities for walking and cycling between hamlets and villages, avoid altering the country look and feel and ensure that there is no 'infill' between hamlets and villages.

With regard to the submissions about loss of prime producing lots; it is noted that the intention of clustering houses together in a hamlet development, is so that the remainder of the land is left in a larger block, which is held in joint ownership and is potentially able to be used for farming purposes.

The suggestion of a trial is accepted as it is noted that there is one site within Rodney District which has had rules imposed enabling a hamlet as a part of an Environment Court appeal.

One of the key issues throughout submissions raised on the Rural Strategy has been that of car reliance. It is accepted that hamlets will have a reasonable level of car reliance. However, this will be less than where lots are spread across the rural production area. Residents of clustered houses have the ability to car pool, or if appropriately located, they may be able to walk to the local village. This part of the Rural Strategy, combined with other initiatives, such as the expansion of local villages, may increase the availability of services in the area and reduce the travel required.

One submitter raised a concern that Tomarata was suggested as a possible area for hamlet development. It should be noted that the Rural Strategy is a long term (25 years) outcome focused strategy. It is considered inappropriate to rule out the possibility of hamlets around Tomarata without further investigations, when the alternative is the potential for sporadic rural development fragmenting this area. Investigations and public consultation may determine that hamlet development is not appropriate, however, this strategy suggests that it is worthy of investigation.

It was noted by one submitter that Puhoi was mentioned twice in the third paragraph under Section 5.3.3 *Key Initiatives – Provide For Rural Hamlets Around Suitable Existing Centres, HOW COULD THIS BE DONE*. This was in part an error. The Strategy was indicating that Puhoi is currently undergoing a structure plan process and it is this process that may determine opportunities or otherwise for hamlets. However, as this strategy has not been adopted at this point, it is recommended that the second reference to Puhoi be removed, to avoid pre-empting any particular outcome. Additionally it has been noted that Puhoi was incorrectly noted as a *Dormitory, resort and bach settlement* on page 17 of the Draft Rural Strategy and also on Figure 6 (page 18 of the Draft Rural Strategy). It is recommended that Puhoi be deleted from this list and that Figure 6 be amended to identify Puhoi as a Rural Service Village, refer to **Appendix 6**.

With regard to the term 'hamlet', although it is accepted that there may be a better name for these types of developments, this term has become known and understood over time and as such it is considered that, in the absence of a more appropriate term, it should be retained. However, suggestions made at the hearing would be welcomed.

The ARC suggested that the design of the approach to hamlets should be as a part of the "strategic assessment of the region which again will occur during the preparation of the new Auckland Spatial Plan". The reporting officers agree that this is an appropriate approach and consider that by including the proposed concept within the rural Strategy, this concept will feed into the Spatial Plan preparation process.

Given that the process for enabling hamlet development is subject to public consultation and may be different for each community, and given that this can be clarified in the Rural Strategy text, it is considered that the concept should be retained in the document.

4.7.4 Draft officer recommendation subject to hearing and Council's decision

That the concept of hamlets be retained and that the amendments outlined in section 4.7.5 be made to the Strategy.

4.7.5 Draft amendments to the draft Rural Strategy subject to hearing and Council's decision

Amend the Rural Strategy Text as follows (additions underlined, deletions struck through):

- (a) Insert the following sentence in Section 5.3.3 *Key Initiatives – Provide For Rural Hamlets Around Suitable Existing Centres, HOW COULD THIS BE DONE*, prior to the paragraph beginning with *As a starting point...* to read: No hamlet development should occur without a public consultation process, be it a structure plan process or other initiative prior to the notification of a plan change, to define whether hamlets are appropriate for specific villages and if so the potential 'limits' within which hamlets could occur around existing villages.
- (b) Amend the following sentence in Section 5.3.3 *Key Initiatives – Provide For Rural Hamlets Around Suitable Existing Centres, HOW COULD THIS BE DONE*, paragraph three be altered to read: *...could also be potential locations for hamlets, as could ~~Puhoi~~, Kaukapakapa depending on the outcome of ~~their~~-its structure plans.*
- (c) Amend Page 17 *Well Managed Recreation Function, What we want?* to read: ~~Puhoi~~, Jamieson/Opahi Bay.
- (d) Amend Section 5.3.3 *Key Initiatives – Provide For Rural Hamlets Around Suitable Existing Centres, HOW COULD THIS BE DONE*, to insert the following sentence at the end of this section which reads: The assessment of suitability for hamlets across

Rodney could occur as part of the process for the preparation of Auckland's Spatial Plan.

4.8 Submissions regarding: other comments

4.8.1 Outline of submissions received

In addition to the specific questions asked by the submission form, there were a number of other topics on which submitters commented. These have been separated into the following categories for discussion:

- Process and consultation
- Country Living Areas
- Kaipara Coast Production Area
- East Coast Rural Areas
- Rural Service Villages
- Greenbelts
- Landscapes and view corridors
- Subdivision
- Ecological values and biodiversity
- Utility function, mineral extraction/quarries and landfills
- Rates
- Farming friendly practices and branding and promotion
- Land potential
- Broadband
- Sandspit
- Process
- Miscellaneous

In addition, there were a number of more specific topics that, for various reasons, are not relevant to this high level strategy. Many of these matters were very relevant to the downstream detailed development of the ideas in the Strategy, but they were too specific for consideration as a part of the Rural Strategy itself i.e. the Strategy simply does not need to go into the detail raised in these submissions.

4.8.2 Discussion

4.8.2.1 Process and consultation

Some of the submitters queried the process in terms of the 'Supercity', Auckland's Regional Documents, the relationship of the Strategy to the existing District Plan and the appropriateness of a strategy of this type being drafted at this time.

Although there were a number of submissions querying the process, the majority were supportive of the Strategy as outlined in Section 4.1 of this report.

The reporting officers' view is that the preparation of the Strategy is appropriate and, if anything, has become more relevant with the impending local government reorganisation in Auckland. The Strategy has been signalled in the LTCCP and it will now be offered as an input into the new spatial plan for Auckland. It will not influence the current District Plan process where the rural appeals are almost entirely resolved, but it is intended that it guide future changes to the District Plan.

It is recommended that an additional statement be added to Section 3 *Basis of the Rural Strategy* to explain where the Strategy sits in relation to the District Plan and regional documents and its consistency with them. This statement should be inserted under Section 3.5 *Influences* and should read as follows:

The Strategy sits outside of the District Plan and should be used as a guiding document to inform future plan changes for the rural area. The Strategy considers spatially what is appropriate for the rural areas in Rodney and given that it is a high level strategic

document, the concepts must be tested to determine whether they are given effect to through the relevant statutory planning documents.

The Strategy has also been considered in light of new zones and activities within the boundary of neighbouring local authorities such as planned new employment areas in Westgate and the existing Albany developments. The Strategy has also taken into account similar strategic processes occurring within Franklin District, being the other rural Council that will form a part of the new Auckland Council.

4.8.2.2 Country Living areas

Submissions regarding Country Living sites included some suggesting smaller site sizes of 0.4 hectares to 0.75 hectares and some suggesting that there was too much land identified as Country Living. Others suggested that the existing Countryside Living rules should remain, due to the expectations of those property owners who have purchased in the area due to the potential subdivision rights. Many submissions also generally supported the provision of Country Living land.

The ARC raised concerns as it stated: "Given the scale of growth of Countryside Living in the Rodney District the identification of new Countryside Living areas of this form [1-2ha] has the potential to adversely affect rural character, the productive capacity of the land and regionally significant infrastructure projects. The Auckland Regional Policy Statement (ARPS) does not envisage any additional Countryside Living, particularly where located on highly versatile soils. Furthermore, the identification of these Countryside Living areas is not part of an overall coherent strategy to address matters such as the low density residential sprawl currently occurring in these areas and an appropriate transition between urban and rural areas."

With regard to the ARC's submission, it is noted that the Northern and Western Sectors Agreement and Auckland Regional Growth Strategy recognises growth in rural areas up to 2021 and beyond. The Rural Strategy is the first step in finding more effective ways to cater for this growth.

Another specific issue raised by some submitters was the concern over the proposed Country Living area between Kumeu/Huapai, with the Kumeu/Huapai Residents' and Ratepayers' Association stating that "A broad brush approach to lifestyle blocks joining Riverhead, Kumeu and Huapai is unacceptable resulting in good soils and productive land being lost and the townships being eventually joined by lifestyle blocks". "Highly productive soils need to be identified and not obliterated as is proposed by countryside living proposal as on Maps, page 34." On this same matter of concern, another submitter stated that "Rezoning from Rural to Countryside Rural in areas surrounding Riverhead is contrary to our Structure Plan, and risks the 'joining' of neighbouring townships Riverhead/Huapai/Kumeu/Coatesville into one town".

It is considered that these latter concerns are valid and that a Mixed Rural Production Area would better separate the Riverhead and Kumeu/Huapai urban areas. Therefore, it is recommended that the area of Country Living between Kumeu and Riverhead be altered on Figure 15 (Page 34 Draft Rural Strategy) to Mixed Rural Production as shown in **Appendix 2** and that consequential changes be made to Figure 7.

The Taupaki Residents' and Ratepayers' Association submission raised the need for a 'greenbelt' along the southern boundary of Rodney and sought that Country Living or Mixed Rural extend between Taupaki and the Bush Living Area shown on Figure 15, Page 34 of the Strategy. The loss of productive soils to Country Living between Kumeu and Riverhead was also challenged. The reasons for the greenbelt to the south include the need to reflect the existing situation in terms of land use and lots sizes and also the pressure on this area from Auckland.

It is recommended that Figure 15, page 34 be altered to change the Rural Production Environment to a Mixed Rural Production Environment in the area between Taupaki, the proposed Bush Living area and State Highway 16, extending to the west of Huapai as shown in map attached as **Appendix 2**.

Additionally, it is noted that the area currently zoned as Countryside Living south of Kumeu/Huapai is not shown on Figure 15, page 34. It is recommended that this be altered to Country Living to reflect the existing zone as shown in the map attached as **Appendix 2**.

4.8.2.3 Kaipara Coast Production Area (KCPA)

The Poultry Association was generally supportive of the KCPA overlay, however, it had some concern that controls on structures and earthworks may unduly restrict primary production activities from expanding or altering existing buildings. The Association suggested that the overlay area was too wide and should not cover the 'inland' areas to the extent that it currently did. More detail was sought on the overlay area.

One submitter considered that the existing recent rules in the District Plan regarding the Kaipara area were adequate and raised concern over restrictions on farmers erecting buildings. This submitter also noted the particular sensitivity of the Dune Lakes area within Kaipara and suggested that a special zone may be a possibility.

Mighty River Power was concerned that the KCPA overlay would result in "...a blanket restriction at the expense of a range of other development opportunities such as the potential for renewable electricity generation".

Mighty River Power requested that "...the Rural Strategy be amended to acknowledge that in certain situations, electricity generation and transmission may be appropriate in the Kaipara Coast Production Environment and that potential landscape effects need to be balanced against the need to provide a reliable consistent electricity supply".

The provisions of the KCPA relate specifically to the location of building platforms and structures at the time of subdivision, rather than any activity or development control on structures on existing sites and are intended to deter residential subdivision whilst supporting rural production. However, other aspects of the Rural Strategy such as the landscape overlay may impose additional restrictions district wide.

With regard to exact width and location of the overlay area, it is considered inappropriate to reduce the extent of the overlay in this high level strategic document as the area is a guide only subject to further investigation.

With regard to the potential for renewable energy with the Kaipara Coast area, it is understood that there is the potential for this activity to occur, however, it is not appropriate for this Strategy to identify specific future sites for these activities. Later sections of this report recommend changes to the *Utilities* section of the Rural Strategy to introduce the concept of renewable energy.

Regarding the landscape controls, refer to section 4.8.2.7 of this report.

It is recommended that the Kaipara Coast Production Area remain unchanged in the Strategy document.

4.8.2.4 East Coast Rural areas

Overall, there was general support for the East Coast Rural area through submissions. Therefore, no change is recommended.

4.8.2.5 Rural Service Villages

Requests have been made to retain Waitoki, Coatesville, Pakiri, Puhoi and Warkworth on the list of *rural community villages* and to add Silverdale and Waimauku to the list of *rural community service villages/settlements*.

It should be noted that these titles were used in Planning Rodney to help understand the different roles that places have in Rodney. Silverdale is a 'Primary Urban Centre' under Planning Rodney and is earmarked as one of the District's major urban growth nodes with capacity for 2,500 additional households established under Variation 52, and with many hectares of business zones being established via current variations. It is not considered to be a village. In Planning Rodney, Waimauku was signalled as a town under pressure from growth requiring careful planning to determine its future. The recently adopted structure plan for Waimauku has confirmed its status as a small town. Although it will serve the surrounding rural area, the term 'rural service villages' is intended to refer to smaller settlements which will

be managed in a unique and particular way. Therefore, no change is recommended to include these two places as 'rural service villages'.

The submissions have however, highlighted a degree of inconsistency and confusion arising from the Draft Rural Strategy on the intended status of various towns and settlements. The list of *rural service villages* on page 13 of the Strategy includes Waimauku and excludes villages like Wainui, Dairy Flat, and Waitoki which are already well known as having a 'rural service' function. The list on page 13 also includes some of the larger towns like Matakana, Leigh, Waimauku and Riverhead some of which (subject to structure planning processes) may grow quite considerably into quite large towns.

The list of towns and villages on page 39 of the draft Rural Strategy is inconsistent with that on page 13. It is recommended that both page 13 and 39 be amended to list all of the towns and villages that serve a rural service function in two lists as follows:

- Rural service towns which may (subject to structure planning processes) be subject to considerable further growth. The list should include – Snells Beach/Algies Bay, Matakana, Riverhead, Waimauku, Waiwera and Kaukapakapa.
- Rural service villages which may be subject to some growth and/or diversification but will generally be retained as small contained villages. The list should include – Kaipara Flats, Tomarata, Coatesville, Pakiri, Tapora, Tauhoa, Wainui, Dairy Flat, Taupaki, Waitoki and Woodhill.

4.8.2.6 Greenbelts

Several submitters addressed greenbelts in their submissions, in particular seeking the retention of GB1, GB2 and GB3 which are also shown in Planning Rodney. Other submissions sought a "green belt – coast to coast" in southern Rodney.

As mentioned in Section 4.4.5 of this report, it is recommended that a note be added to Figures 13, 14 and 15 (Pages 32-34 Draft Rural Strategy) to emphasise that Outstanding Landscapes and Ecological Areas will require further analysis and may result in additional controls. It is considered that these greenbelts are effectively being achieved through different means. Firstly, GB1 and GB2 will be retained as Rural Production areas, with some additional landscape and ecological overlays potentially in the future. While GB3 is achieved through the use of Country Living and Bush Living areas which fix the land use and create a different sort of greenbelt. Therefore, no changes are recommended to the Rural Strategy.

4.8.2.7 Landscapes and view corridors

A number of submitters emphasised their "strong support for quality landscapes..." and the Rodney Economic Development Trust (REDT) stated that "...it is vital to all rural economic activity that a realistic balance is established between important aesthetic values and practical production values and economic reality".

Federated Farmers was most concerned with the "untested Landscape Analysis of Rural Rodney 2009". In particular it was concerned that the justification for the Kaipara Coast Production Area overlay appeared to be founded entirely on the analysis. The analysis refers to Plan Change 8 of the ARPS although this remains unresolved. Submitters requested that the Strategy "...generally recognises the relationship between landscape and how rural land use can alter that landscape" and "...emphasises that rural parts of the District are dynamic working areas...".

The Snells Beach Residents' and Ratepayers' Association Incorporated requested that "...attention be given to the preservation of the view corridor overlooking Kawau Bay from Mahurangi East Road when approaching Snells Beach from the North".

With regard to the concerns above about suggested landscape controls and rural land use, the Strategy recognises that rural production uses should continue to occur and is suggesting that careful identification be undertaken of those areas of significance, rather than by using a 'blanket protection' approach. These basic principles are in line with the general thrust sought in the submissions.

With regard to the view corridor, it is acknowledged, (without professional landscape comment), that the Snells Beach view corridor referred to may well be an important amenity element in the District. However, with a high level strategy of this nature, specific view corridors cannot be addressed here. Nevertheless, it is recommended that Section 5.5.2 *Key Changes – Identify Landscapes and Manage Development, OUTCOMES BEING SOUGHT* be amended to insert the following: Protect locally significant view shafts from public areas including roads, and amend *HOW COULD THIS BE DONE* to insert the following: Identify suitable areas as locally significant view shafts.

4.8.2.8 Subdivision

Some submitters encouraged caution with the use of enhancement planting subdivision, due to potential exploitation of these types of rules and allowances resulting in widespread subdivision.

A number of submitters supported the 'reset subdivision benefit ratios' in Section 5.4.2 of the Strategy and welcomed the change, however, other submitters considered them onerous and considered that the current District Plan provisions were suitable, while one submitter requested that the requirements be eased to encourage more marginal land to be conserved.

The concept of TTRs appears to be generally accepted by submitters. Although one submitter queried whether TTRs were economically viable.

The ARC noted the increase in threshold for bush protection for subdivision entitlement. Tentative support was provided, subject to detailed assessments regarding yield, landscape and rural character impacts.

Overall, there was some variance of opinion on the detail of the subdivision provision which should not be debated here. There was also variance of opinion in regard to the suggested 'raising of the bar' in terms of subdivision. However, it has been determined through the background research, that sporadic subdivision is occurring with often poor environmental benefits. The majority of submitters wished to see farming prioritised and this will not be able to occur in the future given the current rate of subdivision. Therefore, it is recommended that there be no change to the recommendations in the Rural Strategy surrounding subdivision. The wording or detail of specific provisions following on from the direction set in the Strategy will be developed in subsequent processes such as structure plans and District Plan provisions.

4.8.2.9 Ecological values and biodiversity

Some submitters raised concerns regarding natural area protection and restoring and protecting biodiversity. They sought to ensure a cautious approach to managing future subdivision and activities. It was felt that the high ecological values of Te Arai as a habitat for threatened species and high natural and amenity values, including a remote wilderness character, low level of built environment and a largely undeveloped eastern coastline should be recognised. An ecological overlay and landscape criteria were suggested.

It was requested that the development of new sand extraction sites around the Tomarata Dune Lakes be prohibited and non farming buffers around the lakes be put in place due to the cumulative adverse effects on natural, wildlife and amenity values.

With regard to the sensitive ecological areas around Te Arai, it is recommended that Figure 8 be amended to clearly identify these areas as shown in **Appendix 4**. The current map provides an overlay of four layers on top of each other, making it hard to see the lower layers. It is also considered that the information on the maps is not clearly identified in the key. Changes in this respect are recommended, along with the removal of the 'green haze' on the map which is also not referenced. It is considered that the ecological overlay will be appropriately used in determining any future plan change, however, it has also been recommended in Section 4.4.5 of this report that a note be imposed on Figures 13, 14 and 15 referring to the ecological overlay. Specific controls on the Dune lakes and other areas will need to be addressed in processes other than this strategic document.

4.8.2.10 Utility Function, mineral extraction/quarries and landfills

The submission from Winstone Aggregates raised concerns over reverse sensitivity with regard to its existing quarries and, in particular, had concerns over existing quarries being located within the Mixed Rural Production Environment. This matter has been addressed in Section 4.5 of this report and, where practicable, amendments will be made to the Mixed Rural Production Environment to exclude these utility sites. This submitter has requested a number of other changes to wording within the document and these have been considered. It is recommended that the following changes be made to the text of the Rural Strategy - Page 16 *Well Managed Utility Function*:

- alter the first sentence of *What we have* to read: *There are already a number of aggregate ~~and~~-extraction sites and refuse, cleanfill and infrastructure sites in rural Rodney, such as significant mineral extraction resources at Flat Top and Wainui.*
- alter the word *Cautious* to *Considered* under the *What we want* section in the second bubble down.
- alter the word *isolated* to *buffered* under the *What we want*ⁿ section in the second bubble down.
- insert the following sentence as a new bubble under the *What we want* section to read: *Well managed and efficient extraction of identified significant mineral extraction resources.*

A number of submissions sought to ensure that utility sites were not located near future or existing lifestyle areas.

Transpower requested a number of amendments to recognise that the national grid should be protected from inappropriate subdivision and development. These have been considered and it is recommended that the following changes be made to the text and maps of the rural Strategy:

- page 9, Section 4.1 *Achieving Strategic imperatives*, amend the definition of utility function to state: *...cleanfill and the placement of utility sites and networks (power, water, wastewater...*
- page 16, *Well Managed Utility Function*, amend the *What we have* section to insert: *A national power grid traversing the District*
- page 16, *Well Managed Utility Function*, amend the *What we want* section to insert: *The retention of an efficient and effective national power network through the District*
- page 16, *Well Managed Utility Function*, amend the *How do we get it* section to insert as a part of the fourth bullet point, the words: *Rules discouraging lifestyle residential activity in close proximity to utility sites and networks....*
- amend Figure 9, Page 19 to show the location of high voltage transmission lines within the District (refer to **Appendix 5**).

Mighty River Power had concerns that the Strategy fails to acknowledge wind as a natural resource in the rural area and that heavy emphasis has been placed on protecting natural landscapes, at the expense of providing for other necessary development such as electricity generation facilities. As mentioned in earlier sections of this report, specific amendments to the Kaipara Coast Production Area were also sought.

The amendments sought by Mighty River Power have been given consideration and it is recommended that the following changes be made to the text and maps of the rural Strategy:

- amend Figure 9, Page 19 to note that: *Future utility sites should also be considered in any strategic decision*
- page 16, *Well Managed Utility Function*, amend the *What we have* section to insert the words: *Potential Renewable Energy Sites*
- page 16, *Well Managed Utility Function*, amend the *What we want* section to insert the words: *The retention of an efficient and effective national power network through the District and the careful consideration of sources of and sites for renewable energy.*

4.8.2.11 Rates

Although rates was a significant topic of discussion at the open consultation evenings, this was not reflected in the written submissions. Very few submissions were received on the topic of rates. Those that did submit, commented as follows:

- one submitter stated that “industrial uses approved on rural land, need to be paying not only development levies but also continuing commercial or industrial rates”
- a submission was received supporting rates remission to prevent the grazing of bush and a 50% grant of the cost of fencing as an added inducement. The submitter also suggested that rates relief could be considered where economic farms had land values which were based on neighbouring country lifestyle blocks
- a submitter stated that “the Rural Rating policy hints at a policy to encourage farming and horticulture. I believe that this is the key to maintaining a greenbelt in south Rodney. It must be linked to Open Country Covenants that allow farmers, growers and vineyards to stay productive during economic downturns and not be tempted to carve up their land”
- a submitter suggested that the Council “use a base rate per household based on average of urban rates and then add 2 percent of gross production”
- one group of submitters supported the principle of not rating productive activity off of rural land as a result of planning and artificial pressures, nor the inappropriate application of rating changes.

All of the above are accepted as valuable suggestions and comment. With regard to industrial or commercial rates on rural land, this concept could prove difficult to manage. It is recommended that the rural rates policy suggestions in the Rural Strategy remain, because they suggest a range of possible areas for consideration without limiting these to particularly specific measures.

4.8.2.12 Farming friendly practices and branding and promotion

There were very few submissions on these proposals, however, one submitter raised concerns that farming friendly practices can lead to a lessening of the environmental controls. It is considered that the Strategy needs to be read in a holistic manner, taking into account other actions to ensure high quality environmental outcomes.

Federated Farmers supported both farming friendly practices and culture and the branding and promotion actions. However, it suggested that a memorandum of understanding (MOU) would be not be necessary for the latter to be achieved. No other comments were received on this point. The MOU was suggested as one option of achieving the outcomes required not as a mandatory requirement.

The REDT supported the Branding and Promotion actions and consider that there is scope for Rodney to become a centre for excellence in sustainable systems and technologies.

Given the above, it is recommended that these sections of the Strategy be retained.

4.8.2.13 Land potential

A number of submitters stated “don’t undertake further investigation of land potential – establish appropriate policies/criteria and let landowners/applicants undertake the analysis and design response. A ‘command and control’ approach rarely leads to good design and innovative response”. It is unclear what is sought by these submissions and, as such, no changes are recommended to the Strategy. It would be appropriate for the submitters to elaborate on this point at the hearing.

4.8.2.14 Broadband

The REDT stressed the importance of broadband to the rural community in its submission, stating that existing rural export businesses and home based businesses were hampered by dial-up restrictions.

It is recommended that the Section 5.7 Specific Initiatives – Rural Infrastructure, Page 53 *OUTCOMES BEING SOUGHT*, should be amended to include the following statement: Rural broadband is available to the majority of rural communities within Rodney District.

4.8.2.15 Sandspit

The Sandspit Residents’ and Ratepayers’ Association (SRRRA) requested that Sandspit be identified as Bush Living. This area is currently considered urban under the Rodney District Plan 2000 – Operative in Part, as it falls under the residential zone chapter and so was identified as an *urban zone* on Figure 13, Page 32 of the Strategy. The SRRRA considers this an error. The submission advised that the SRRRA has sought a rural zoning for the area since 1999 and considered that the bush clad environment in which there is no reticulated water or sewerage should be considered rural. The submission outlined that “Sandspit has 271 sections, mainly zoned Residential – landscape protection (165), some Residential low intensity (61), and a small area of Residential M – township policy (45). The majority of sites are a minimum of 8000m², being the minimum site sizes for the low intensity and landscape protection areas”. The residents of Sandspit are clearly passionate about natural areas and living in harmony with their environment.

It is noted that the Strategy currently states in the *Bush Living Areas* section of the report under *WHY THIS APPROACH*, that: *A unique approach can be developed for areas like Weiti Forest Park and Kawau Island settlement area to provide for their unique issues and circumstances. There are a number of other areas which could potentially benefit with this approach, including Sandspit.* It is not recommended that the Sandspit area be noted as rural in the Strategy as this would be inconsistent with other areas of Landscape Protection and Low Intensity Residential that have not been considered in this Strategy.

However, it is acknowledged that the Residential – Landscape Protection and Residential Low Intensity planning provisions at Sandspit, although set down in the District Plan as urban, are achieving desirable bush living outcomes. It is recommended that the aforementioned sentence be altered to state that: *A unique approach can be developed for areas like Weiti Forest Park and Kawau Island settlement area to provide for their unique issues and circumstances. There are a number of other areas which could potentially benefit with this approach including Sandspit which displays clear characteristics consistent with the proposed Bush Living Environment within its existing Landscape Protection and Low Intensity Residential Areas and may be re-considered as a rural zone in the future. These provisions, where they are proven to be successful, could be more widely used in other rural areas.*

4.8.2.16 Miscellaneous

It was noted by attendees at the open consultation evenings that Figures 13, 14 and 15 on pages 32-34 of the Strategy, do not cover the entire District due to the map format. It is recommended that these figures be amended to ensure that they include all land within the District.

4.8.3 Draft officer recommendation subject to hearing and Council's decision

That the amendments outlined in Section 4.8.4 be made.

4.8.4 Draft Amendments to the draft Rural Strategy subject to hearing and Council's decision

That the recommended amendments set out in Sections 4.8.2.1, 4.8.2.2, 4.8.2.5, 4.8.2.6, 4.2.8.7 and 4.8.2.9, 4.8.2.10, 4.8.2.14, 4.8.2.15 and 4.8.2.16 be made.

4.9 Consultation with iwi

4.9.1 Consultation

As outlined earlier in this report, Ngati Whatua Nga Rima o Kaipara and Te Uri o Hau have provided comments and attended meetings with Council staff.

It was noted at the meeting with Nga Rima o Kaipara, that overall, any rural strategy will impact quite significantly on Maori. The main issues that arose during the meeting with Ngati Whatua Nga Rima o Kaipara were as follows:

1. The need to encourage the fencing of waterways and ensure that culverts allow for fish passage.
2. It was noted that the Strategy does not discuss Papakainga housing nor Maori being able to use their land for businesses.
3. Concerns were raised over restricting bush subdivision, concern that no compensation is given for tightening the rules to take away the right to subdivide or requiring that bush be protected.
4. The Rural Strategy should recognise Maori knowledge of sustainability and environmental management, recognise the issue of Maori aspirations for development of land and for living on their land as a very significant landowner, and address how land in and around Marae can be dealt with.

It is noted that Maori knowledge of sustainability is referred to in Section 5.9 *Specific Initiatives – Maori Owned Land* of the Strategy. With regard to the other issues raised, they are considered to be too detailed for the high level of the Strategy and in the cases of Papakainga housing and the removal riparian vegetation, rules exist within the current District Plan provisions to address these matters.

Detailed comments have been provided by Environs Holdings Ltd for Te Uri o Hau. Te Uri o Hau supported the development of a rural strategy, however, it considered that the draft, in its current form, did not adequately address its concerns. Some of its concerns and the matters that it requested are addressed including the following:

- (a) the need to refer to the Te Uri o Hau (TUOH) Settlement Act and Statutory Acknowledgements and settlement legislation
- (b) the lack of reference to climate change and genetically modified organisms and genetic engineering
- (c) the Strategy should include reference to the Regional Policy Statement
- (d) the Strategy should include specific reference to cultural values and relationships of tangata whenua with natural and physical resources within the *focus issues, strategic imperatives* and *outcomes*.
- (e) would like to see more focus on improving our environment, for example by requiring infrastructure prior to development and active management and enhancement of riparian margins
- (f) broader consideration of cultural heritage values e.g. specific mention of water quality
- (g) better consideration of how productive soils are to be protected

- (h) recognition and provision for access for Maori to areas for cultural purposes and restricted public access where necessary
- (i) recognition of the importance of the Kaipara Harbour in the *Kaipara Coast Production Area* section of the Strategy
- (j) mention of the impacts on communities that lifestyle development has, e.g. schools
- (k) rates were raised as an issue along with the need to recognise Maori land as a resource
- (l) Maori need to be able to use and develop their land in order to provide for their economic, social and cultural wellbeing
- (m) include specific mention of Papakainga and marae.

It is recommended that the following amendments be made to the Strategy to address some of the concerns of Te Uri o Hau, these may be altered or extended following the presentation of their submission at the hearing:

- (i) refer to the TUOH Settlement Act and Statutory Acknowledgements and settlement legislation in a new subsection after Planning Rodney in Section 3.5, page 8 of the Strategy
- (ii) brief reference be included to relevant statutory planning documents, which would include the Regional Policy Statement, as already recommended in Section 4.8.2.1 of this report
- (iii) Discuss (d), (e), (f), (h) and (l) above in section 5.9 *Maori Owned Land* of the Strategy, page 56
- (iv) Discuss the importance of the Kaipara Harbour in the *Kaipara Coast Production Area* section of the Strategy, Page 24.

With regard to climate change, it is considered that it is inherent that any future rules will deal with climate change. With regard to genetically modified organisms, it is understood that Council has a position on this and that it is being dealt with as a part of a separate process. Further detail regarding points (g) (j) and (l) would be welcomed at the hearing.

4.9.2 Draft officer recommendation subject to hearing and Council's decision

That the amendments outlined in Section 4.9.1 be made to the Strategy.

4.9.3 Draft amendments to the draft Rural Strategy subject to hearing and Council's decision

That the following amendments to the text of the Strategy be undertaken.

- (a) amend the Strategy, to refer to the TUOH Settlement Act and Statutory Acknowledgements and settlement legislation in a new subsection after Planning Rodney in Section 3.5, Page 8 of the Strategy
- (b) amend Section 5.9 *Maori Owned Land* of the Strategy on Page 56, to discuss (d), (e), (f), (h) and (l) in Section 4.9.1 of this report
- (c) amend the *Kaipara Coast Production Area* section of the Strategy on Page 24, to discuss the importance of the Kaipara Harbour.

5.0 Conclusion

The rural areas of Rodney have a set of particular values and tensions that warrant a coherent strategy to be managed well. Rural land use planning, and rural growth and environmental management are complex issues. This Strategy has now been compiled and consultation has been undertaken with stakeholders.

It is considered that the submissions on the Rural Strategy have identified the main issues and that overall there is strong support for the Strategy. It is accepted that there are differing views on the ways to manage rural Rodney. This has necessitated a careful balancing of views/submissions to ensure a coherent strategy rather than placing issues in isolation. Overall the writers believe that the

Strategy strikes a balanced view focused on issues of consensus to provide a good basis for future detail.

It is recommended that, following deliberations, the Council resolve to adopt the Rural Strategy with the recommended changes outlined in **Appendix 7** and pass it on to the new Auckland Council as an input to the Spatial Plan and subsequent District Plan review.

APPENDIX 7

APPENDIX 7

BASIS OF THE RURAL STRATEGY

Add an additional statement to Section 3.5 *Influences* to read as follows:

The Strategy sits outside of the District and Plan and should be used as a guiding document to inform future plan changes for the rural area. The Strategy considers spatially what is appropriate for the rural areas in Rodney and given that it is a high level strategic document, the concepts must be tested to determine whether they give effect to the Regional Policy Statement before they are utilised as the basis for any plan changes.

The Strategy has also been considered in light of new zones and activities within the boundary of neighbouring local authorities such as planned new employment areas in Westgate and the existing Albany developments. The Strategy has also taken into account similar strategic processes occurring within Franklin District, being the other rural Council that will form a part of the new Auckland Council.

Amend the strategy, to refer to the TUOH Settlement Act and Statutory Acknowledgements and settlement legislation in a new subsection after Planning Rodney in Section 3.5, page 8 of the Strategy.

KEY FOCUS ISSUES

Amend the Rural Strategy Section 3.7 *Key Focus Issues* as follows (additions underlined):

- 6) Sporadic **location of development** and the effects associated with it.
- 7) Overly general approach to environmental management.
- 8) The need to ~~foster~~ acknowledge and ~~enhance~~ support local identity.
- 9) Development resulting in additional pressure on infrastructure including roads.
- 10) Potential loss of biodiversity and impacts on coastal areas through development pressures.

Undertake consequential changes to the Executive Summary to reflect the above.

STRATEGIC IMPERATIVES

Amend the Rural Strategy Section 4.1 *Achieving strategic imperatives* as follows (additions underlined, deletions struck through):

- (a) Amend footnote² to read: *The utility function describes the role Rural Rodney is inevitably asked to play in the region for ~~schools~~, mining of resources, the disposal of waste and cleanfill and the placement of utility sites (power, water wastewater and telecommunication sites and routes).* (refer page 9 Draft Rural Strategy).
- (b) Amend **imperative 4** to read: **Supporting Strong Viable communities** – by supporting local cultural heritage and by providing efficient and effective infrastructure.
- (c) Undertake consequential changes to the Executive Summary to reflect (b) above.
- (d) Undertake consequential changes within the strategy document to reflect (a) above.

STRATEGIC RESPONSES

Page 9, Section 4.1 *Achieving Strategic imperatives*; amend the definition of utility function to state ...*cleanfill and the placement of utility sites and networks (power, water, wastewater...)*

Amend page 13 *Strong Viable Communities* to list all of the towns and villages that serve a rural service function in two lists as follows:

- Rural service towns which may (subject to structure planning processes) be subject to considerable further growth. The list should include – Snells Beach/Algies Bay, Matakana, Riverhead, Waimauku, Waiwera and Kaukapakapa.
- Rural service villages which may be subject to some growth and/or diversification but will generally be retained as small contained villages. The list should include – Kaipara Flats, Tomarata, Coatesville, Pakiri, Taporā, Tauhoa, Wainui, Dairy Flat, Taupaki, Waitoki and Woodhill.

Amend Page 16 *Well Managed Utility Function* as follows:

- Alter the first sentence of *What we have* to read: *There are already a number of aggregate ~~and~~ extraction sites and refuse, cleanfill and infrastructure sites in rural Rodney, such as significant mineral extraction resources at Flat Top and Wainui.*
- Alter the word *Cautious* to *Considered* under the *What we want* section in the second bubble down.
- Alter the word *isolated* to *buffered* under the *What we want* section in the second bubble down.
- Insert the following sentence as a new bubble under the *What we want* section to read: *Well managed and efficient extraction of identified significant mineral extraction resources.*
- Amend the *What we have* section to insert: *A national power grid traversing the District.*
- Amend the *What we want* section to insert: *The retention of an efficient and effective national power network through the District.*
- Page 16, *Well Managed Utility Function*, amend the *How do we get it* section to insert as a part of the fourth bullet point the words: *Rules discouraging lifestyle residential activity in close proximity to utility sites and networks....*
- Page 16, *Well Managed Utility Function*, amend the *What we have* section to insert the words *Potential Renewable Energy Sites.*
- Page 16, *Well Managed Utility Function*, amend the *What we want* section to insert the words *The retention of an efficient and effective national power network through the District and the careful consideration of sources of and sites for renewable energy.*
- Amend Page 17 *Well Managed Recreation Function, What we want?* to read *Puhoi, Jamieson/Opahi Bay.*
- Amend Figure 6 to clearly identify Puhoi as a Rural Service Village.
- Amend Figure 7 to make consequential changes to the Mixed Rural Production Area.
- Amend Figure 8 to clearly identify the overlays as shown in Appendix 4 and make other minor amendments to clarify the information shown in the figure including amending the wording within the key and removing the 'green haze' on the figure.
- Amend Figure 9, Page 19 to show the location of high voltage transmission lines within the District.
- Amend Figure 9, Page 19 to note that Future utility sites should also be considered in any strategic decision.

FIGURES 13, 14 AND 15

Amend the Rural Strategy Figures 13, 14 and 15 as follows (additions underlined):

- (a) Insert a note on each Figure to state Outstanding Landscapes and Ecological Areas will require further analysis and may result in additional controls.
- (b) Insert a note on each Figure to state Due to the 'high level' concept approach of the Rural Strategy the detail of mapped areas is indicative rather than definitive, and the detail will need to be confirmed before being implemented, for example better definition of constraints such as flood hazard/sensitivity may result in changes.
- (c) Amend Figure 15, Page 34, to exclude some existing utility sites from the Mixed Rural Production Environment as shown in **Appendix 2.**
- (d) Amend to identify Kaipara Flats, Tomarata, Coatesville, Pakiri, Tapora, Tauhoa, Wainui, Dairy Flat, Taupaki, Waitoki and Woodhill as subject to potential village expansion and/or diversification.
- (e) Amend to identify the area of Country Living between Kumeu and Riverhead as Mixed Rural Production as shown in **Appendix 2.**
- (f) Amend to change the Rural Production Environment to a Mixed Rural Production Environment in the area between Taupaki, the proposed Bush Living area and State Highway 16 extending to the west of Huapai as shown in map attached as **Appendix 2.**
- (g) Amend to Country Living to reflect the existing zone as shown in map attached as **Appendix 2.**

RURAL PRODUCTION ENVIRONMENT

Amend the *Rural Production Environment, HOW COULD THIS BE DONE* Section, Page 22, to insert the following, **Farming permitted** *No consents needed for farming...production. Non-rural activities should be restricted to enable farming activities to dominate in the Rural Production Environment* .

KAIPARA COAST PRODUCTION AREA

Amend the *Kaipara Coast Production* Section of the Strategy on Page 24, to discuss the importance of the Kaipara Harbour.

MIXED RURAL PRODUCTION ENVIRONMENT

Amend the Rural Strategy Text as follows Page 26, *Mixed Rural Production Environment* to alter the following (additions underlined, deletions struck through):

- (a) **Utility development**
Although extensions to existing utility sites may occur with appropriate mitigation, new utility sites such as ~~Cautious approach to activities like~~ major quarrying and clean filling should be discouraged ~~and intensive farming operations~~ acknowledging the expectations of lifestyle activities in the area.
- (b) **Farm diversification**
Reconsider the need for...and leisure facilities. Acknowledge that the Mixed Rural Environment is a 'production' environment and intensive farming activities should be anticipated.

BUSH LIVING AREAS

Amend *Bush Living Areas* section of the strategy under *WHY THIS APPROACH*, to read *A unique approach can be developed for areas like Weiti Forest Park and Kawau Island settlement area to provide for their unique issues and circumstances. There are a number of other areas which could potentially benefit with this approach including Sandspit which displays clear characteristics consistent with the proposed Bush Living Environment within it's existing Landscape Protection and Low Intensity Residential Areas and may be re-considered as a rural zone in the future. These provisions, where they are proven to be successful, could be more widely used in other rural areas.*

KEY INITIATIVES

Amend the Rural Strategy text as follows (additions underlined, deletions struck through):

- (a) Insert the following sentence at the end of Section 5.3.2 *Key Initiatives – Growing Rural Communities, HOW THIS COULD BE DONE* that reads Prior to the expansion/diversification of any of the above rural community service villages, a structure plan process or process of adopting a ‘community vision’ should be undertaken to determine the extent, location, density and any key controls appropriate to the proposed expansion/diversification within physical and infrastructure constraints.
- (b) Amend the following sentence in Section 5.3.2 *Key Initiatives – Growing Rural Communities, HOW THIS COULD BE DONE*, to read Planning Rodney sets out a number of ‘towns under pressure’ that require a precautionary management focus and as such may not be suitable for expansion, these include ~~figours case for focusing growth management in~~ Matakana, Snells Algies, Puhoi, Waiwera, Kaukapakapa, Huapai and Riverhead ~~in the first instance which Rodney District Council has responded to by resourcing structure planning and statutory plan changes.~~
- (c) Amend Section 5.3.2 *Key Initiatives – Growing Rural Communities, HOW COULD THIS BE DONE*, page 39 to read In many instances it may be appropriate to diversify existing land within a village to accommodate a wider range of land uses such as café’s or general stores, as opposed to expanding the village.
- (d) Amend page 39, Section 5.3.2 *Key Initiatives – Growing Rural Communities* to list all of the towns and villages that serve a rural service function in two lists as follows:
 - Rural service towns which may (subject to structure planning processes) be subject to considerable further growth. The list should include – Snells Beach/Algies Bay, Matakana, Riverhead, Waimauku, Waiwera and Kaukapakapa.
 - Rural service villages which may be subject to some growth and/or diversification but will generally be retained as small contained villages. The list should include – Kaipara Flats, Tomarata, Coatesville, Pakiri, Taporā, Tauhoa, Wainui, Dairy Flat, Taupaki, Waitoki and Woodhill.
- (e) Insert the following sentence in Section 5.3.3 *Key Initiatives – Provide For Rural Hamlets Around Suitable Existing Centres, HOW COULD THIS BE DONE*, prior to the paragraph beginning with *As a starting point...* to read No hamlet development should occur without a public consultation process, be it a structure plan process or other initiative prior to the notification of a plan change, to define whether hamlets are appropriate for specific villages and if so the potential ‘limits’ within which hamlets could occur around existing villages.
- (f) Amend the following sentence in Section 5.3.3 *Key Initiatives – Provide For Rural Hamlets Around Suitable Existing Centres, HOW COULD THIS BE DONE*, paragraph three be altered to read ...could also be potential locations for hamlets, as could ~~Puhoi~~, Kaukapakapa depending on the outcome of ~~their-its~~ structure plans.
- (g) Amend Section 5.3.3 *Key Initiatives – Provide For Rural Hamlets Around Suitable Existing Centres, HOW COULD THIS BE DONE*, to insert the following sentence at the end of this section which reads: The assessment of suitability for hamlets across Rodney could occur as part of the process for the preparation of Auckland’s Spatial Plan.

KEY CHANGES

Amend Section 5.5.2 *Key Changes – Identify Landscapes and Manage Development*, *OUTCOMES BEING SOUGHT* be amended to insert the following *Protect locally significant view shafts from public areas including roads.* and amend *HOW COULD THIS BE DONE* to insert the following *Identify suitable areas as locally significant view shafts.*

SPECIFIC INITIATIVES

Amend Section 5.7 *Specific Initiatives – Rural Infrastructure*, Page 53 *OUTCOMES BEING SOUGHT*, should be amended to include the following statement *Rural broadband is available to the majority of rural communities within Rodney District.*

Amend Section 5.9 *Maori Owned Land* of the Strategy on Page 56, to discuss (d), (e), (f), (h) and (l) in Section 4.9.1 of this report.

- Appendix 1** – **Summary of submissions**
- Appendix 2** – **Figures 13, 14 and 15 incorporating recommended amendments and consequential amendments to Figure 7**
- Appendix 3** – **Utilities overlay map**
- Appendix 4** – **Figure 8 incorporating recommended amendments**
- Appendix 5** – **Figure 9 incorporating recommended amendments**
- Appendix 6** – **Figure 6 incorporating recommended amendments**
- Appendix 7** – **Summary of recommended amendments**

