20 September 2019

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Tēnā koe

Far North 2100 District Strategy and Spatial Plan “Mapping Our Future”

On behalf of Te Rūnanga-ā-iwi o Ngāpuhi the following is provided in response to your letter dated 5 September 2019 requesting feedback on the draft public discussion document.

Te Rūnanga-ā-iwi-o Ngāpuhi is the mandated iwi authority and representative body of descendants of Ngāpuhi, the largest iwi in Aotearoa with over 125,600 constituents (2013 census). Te Whare Tapu o Ngāpuhi is our operational rohe (boundary) i.e. the tribal lands and shores of the mid-North region, including Taumārere (the Bay of Islands) through to Manaia, Whangārei, from the Hokiang down the West Coast to Maunganui and all lands in between those coasts.

Te rohe pōtae (boundary) o Ngāpuhi-Nui-Tonu extends from the Pōkeno in the South to Cape Reinga in the North, often referred to as, Tāmaki Makaurau ki Te Reenga Wairua or the house of the eponymous ancestors, Puhkaiariki, Puhimoanariki and Puhitaniwharau.

Te Rūnanga-ā-iwi o Ngāpuhi predominantly services Māori from the Southern shores of the Hokiang Harbour in the West, Mangamuka/Mangataipa in the North, Whaingāroa and Rākaumangamanga in the East to Takahiwi/Manaia in the South.

The role of the Te Rūnanga-ā-iwi-o Ngāpuhi is to be the interface between government, both local and central, and their respective agencies that have fiduciary obligations to Māori. The Mission of Te Rūnanga-ā-iwi-o Ngāpuhi is to protect, enhance and promote the well-being of our Taonga and assets of our people whilst ensuring the government continues to uphold and carry out its obligations under He Whakaputanga o te Rangatiratanga o Niu Tireni and Te Tiriti o Waitangi.
Comment and Feedback

Te Tiriti o Waitangi
Te Tiriti o Waitangi is absent. We recommend this be acknowledged and included.
- How does the Plan respond to Ngāpuhi aspirations and well-being?
  - This process will require a significantly higher level of collaboration, as well as resolution and resourcing. It will require significant commitment of Council funding to its long-term implementation.
  - It would be important for Council to scope and agree with Ngāpuhi, on the matters that a spatial plan would address, as this would influence the costs and complexity of its production.
  - Also important is for Council to develop a set of fair processes and procedures that are agreed and locked in from the beginning, and a formal, collective commitment is made to ensure that the process is adequately resourced and managed and the resultant plan implemented.
  - Typically, spatial planning involves a collaborative process and is not solely centred on land use or prescriptive regulation. How does the Spatial Plan enable better integration between Ngāpuhi plans and aspirations, and infrastructure investment planning.

Economic
- How does the Plan provide stability, certainty and confidence for investment relating to Ngāpuhi?
- What lands within Ngāpuhi have been identified to meet the need for economic development?
- How will Council ensure that land for development meets the needs of Ngāpuhi and local communities?

Social
- How will Council develop a common understanding of the needs of Ngāpuhi in social policy development?
- How will Council improve and maintain accessibility for Ngāpuhi when considering the location of new developments?
- In what ways does Council support the provisions of local facilities for Ngāpuhi where they are lacking?

Environmental
- How will Council conserve important environmental, historical and cultural resources that are significant to Ngāpuhi?
- How does the Plan address potential environmental risks and improve Ngāpuhi resilience?
- How does the Plan provide for the protection and enhancement of areas for recreation and natural heritage?
- How does the Plan encourage energy efficiency in the layout and design of developments?
We are also interested in your comments on the following:

**Key issues regarding a Spatial Plan**
- The relationship and integration between the Plan and other planning documents, especially Iwi / Hapū Environment Management Plans and other iwi / hapū planning documents.
- In terms of a statutory framework for the development of the strategy and spatial plan, some strategies and spatial plans sit within the RMA process allowing input, feedback and challenges. It would be worth knowing if Council has a view to seek an alternative legislative process.
- Spatial planning integrates cross sector based policy, underpinned by evidence. The extent to which the evidence base that affects policy and decision makers, can provide unanticipated consequences for certain natural resources and communities when considering a Spatial Plan.

**Spatial Plan Delivery Options**
Moving from land use planning to strategic spatial planning will require a considerable collaborative process. However, to advance the preparation and implementation of a spatial plan for the area, in the event that an agreement in principle is reached. Potential options are:
- Collaborative spatial plan development – as a mechanism to provide collective governance oversight centred on the development and implementation of the spatial plan. The Committee should comprise equal political representation from contributing local authorities, Iwi, NZTA etc.
- Enter into a spatial planning shared service arrangement or transfer of responsibility – this would see one of the constituent councils being contracted to either prepare and implement the Plan on behalf of all councils or prepare the plan, with implementation undertaken by individual councils.
- Establishment of a dedicated spatial planning agency – an amendment to the Local Government Act is envisaged under this option.

Thank you for the opportunity to provide comment and we look forward to your response. Please contact my EA Donna Tukariri 021 786 889 should you wish to discuss further.

Ngā mihi

[Signature]

Lorraine Toki
Te Tumuhere - CEO