

Revenue and Financing Policy 2024 Amendment

ATT 1: Submissions Analysis

February 2026

Executive Summary

- 64 written submissions were received on the proposed Revenue and Financing Policy 2024 amendment
- 50 submitters (78.1%) supported the proposed wording to reinstate the collection of development contributions.
- 3 submitters raised concerns about affordability and development impacts; 8 suggested alternative or retaining suspension wording; 2 raised broader accessibility / equity issues; 1 opposed enabling the collection of development contributions.
- Issues about contributions levels, exemptions, affordability, and wider funding strategy related to the Utu Whakawhanake Development Contributions Policy and Council's overall financial strategy, not the narrow scope of the RFP wording change.
- Staff consider the amended wording clear, legally robust, and aligned with Council's October 2025 decision, and recommend adoption without substantive change, with any minor drafting refinements delegated to the Chief Executive.

Purpose

Council received 64 written submissions on the proposed amendment to the Revenue and Financing Policy 2024 (RFP). No verbal submissions were requested. This public consultation was held between 19 January – 15 February 2026.

The public consultation sought feedback on changing the RFP proposed wording amendment to enable the reinstatement of development contribution collection under the Utu Whakawhanake Development Contributions Policy 2025 (UWDCP). The purpose of this report is to analyse the submissions received, present recommendations, and support Council's decision-making.

Background

The Local Government Act 2002 (LGA) mandates that all statutory funding mechanisms, including development contributions (section 103(2)(g) LGA), be clearly identified in the Council's Revenue and Financing Policy (RFP). The current RFP, (adopted in June 2024), outlines various funding sources but currently suspends the collection of development contributions, except for legacy consents and development contributions collected through development agreements.

To implement the new UWDCP set to commence on 29 May 2026, an amendment to the RFP is legally necessary. Failure to amend the RFP exposes the Council to potential legal risks and growth-related capital works infrastructure funding shortfalls.

At its 11 December 2025 Council meeting, Council adopted the consultation document that proposed the procedural amendment to the RFP.

The current RFP wording is:

“While the council has resolved to continue to suspend the charging of development contributions for this LTP. Outstanding contributions charged prior to the suspension of the 2015 Development Contributions Policy will continue to be received.”

The proposed amended wording is:

“The council has resolved to reinstate the charging of development contributions for this LTP. Outstanding contributions charged prior to the suspension of the 2015 Development Contributions Policy will continue to be received”.

The public were asked whether they supported the proposed amendment or had suggestions for alternative wording. The consultation material made clear that feedback should relate to the amended policy amendment wording, not the substantive provisions of the UWDCP.

Summary of Submissions

Council received **64 submissions** during the consultation period. The responses were:

- **50 submitters** (78.1%) answered “Yes” indicating they support the proposed amended wording.
- **14 submitters** (21.9%) selected “Other”

Among the 14 submitters who selected “Other”:

- **1 submitter** (Submitter 55) explicitly stated opposition to the amendment, representing 1.6% of total submissions
- **3 submitters** (Submitters 7, 42, 43) expressed concerns about the impacts of reinstating development contributions, representing 4.7% of total submissions
- **8 submitters** (Submitters 19, 20, 26, 28, 63, 65, 66) suggested alternative wording or changes to the RFP text, representing 12.5% of total submissions
- **2 submitters** (Submitters 62, 64) raised matters that were assessed as out of scope of this wording amendment, representing 3.1% of total submissions.

Among the 14 “Other” responses, some submissions also raised wider issues such as exemptions to Māori land, housing affordability, and the broader funding strategy, which were considered through the earlier consultation on the draft UWDCP.

Table 1: Support for the proposed Revenue and Financing Policy Amendment

Theme	Submitter IDs	Count	%	Notes
Theme 1: Yes – Support	1, 2, 3, 4, 5, 6, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 22, 23, 24, 25, 27, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 58, 59, 60,61	50	78.1%	All “Yes” responses
Theme 2: Other – Concerns about Impacts	7, 42, 43	3	4.7%	Developer concerns
Theme 3: Other – Alternative Wording	19, 20, 21, 26, 28, 63, 65, 66	8	12.5%	In conflict with Council’s previous decisions
Theme 4: Other – Explicit opposition	55	1	1.6%	Opposes amendment itself
Theme 5: Out of Scope	62, 64	2	3.1%	Accessibility, broader policy
TOTAL		64	100%	

General Feedback

Most submitters supported the proposed wording and recognised that the amendment is necessary to enable Council to legally collect development contributions under the UWDCP. A smaller number raised concerns about the impacts of development contributions or proposed alternative wording approaches.

This report summarises the key themes from submissions, provides staff analysis, and sets out recommendations for Council consideration.

Theme 1: Support For Clarified and Strengthened Wording

Submissions Received

50 submissions expressed clear support for the proposed wording. Submitters valued the clear statement that Council resolved to reinstate development contributions and the removal of confusing language.

Examples include:

- **Submitter 25:** “Good to see it CLEARLY WRITTEN IN ENGLISH!”
- **Submitter 44:** “Wholeheartedly agree with Proposed Wording.”
- **Submitter 2:** “Just get on with it!!!”

- **Submitter 49**, who noted: *“We never should have suspended development contributions in the first place. The council may not be able to raise rates in the future if central government has their way so we need to ensure new developments contribute to the increased infrastructure costs they bring.”*

Other submitters provided substantive rationale for supporting the wording change.

Submitter 11 explained the fundamental fairness underpinning development contributions, drawing on extensive experience with Auckland Council:

“Development contribution is to focus the additional costs of infrastructure load on the new users. Users should pay for the services they receive. Otherwise, you are loading the additional cost on legacy users who have already paid their share. The developers are the people being subsidised by the ratepayers. I worked at Auckland Council for 25 years and saw the avoided deferred overheads morph into huge rate increases in later years fall on unrelated users, and developers benefit hugely from development that they made massive profits from.”

Submitter 40, a retired geotechnical engineer with over 40 years of experience in subdivision development, provided professional support for the policy change:

“As a retired Consulting Geotechnical Engineer who has worked on many large & small scale subdivisions over 40+ years, I support the charging of development contributions so as to assign the indirect societal costs where they belong. I do however, wonder if there should not be a stated commencement date in the wording.”

Submitter 48 addressed the broader accountability benefits of the wording change:

“I believe that the word change will put responsibility back onto those businesses that create the need for more infrastructure. This type of impact should be included as a required report at resource consent stage. Many businesses use the s91 RMA clause to apply for smaller building permits when in fact they are part of a larger building project and therefore can apply the non-notification clause and this doesn't trigger the requirement to do a CIA or SIA. So I believe the word change to be fair in terms of putting responsibility back on those creating the extra spending and which ultimately is on ratepayers.”

Staff Analysis

The strong level of support (**78.1%**) for the proposed amended wording indicates public confidence that the wording change appropriately reflects Council's policy direction and provides clarity about the status of development contributions in the Far North District. Submitters clearly understood that the amendment serves an enabling function, allowing Council to implement the UWDCP that was adopted following a comprehensive consultation in October 2025.

The current wording in the RFP contains internal inconsistencies. It states that “the council has resolved to suspend” development contributions while simultaneously acknowledging

ongoing collection of contributions from pre-2015 consents. This creates confusion about Council's actual position and undermines the effectiveness of the RFP as a strategic document. The proposed amended wording eliminates this ambiguity by clearly stating Council's decision to reinstate charging.

The suggestion by **Submitter 40** regarding including a commencement date in the wording has merit from a transparency perspective. However, the commencement date for the UWDCP is established in that policy itself (29 May 2026) and does not need to be duplicated in the RFP. The RFP serves as an enabling document that provides for development contributions as a funding mechanism, while the specific operational details including commencement dates are appropriately contained in the UWDCP itself. This approach maintains clarity in the policy hierarchy and avoids potential inconsistencies if the dates were stated in multiple documents.

Theme 1 Staff Recommendation

Council Staff recommend no changes to the proposed amended wording in response to submissions supporting the clarification. The level and quality of support demonstrates that the proposed wording effectively communicates Council's policy position and provides the necessary clarity for stakeholders.

Theme 2: Concerns About Development Contribution Impacts

Submissions Received

Some submitters who selected "other" in the survey, raised concerns about the broader implications of reinstating development contributions, though these concerns related primarily to the substance of the UWDCP rather than the specific RFP wording amendment that was subject of this consultation.

Submitter 7 expressed concern about the cumulative financial burden on developers:

"New builds already pay enough with the numerous consultants that they are now required to engage, even before committing to a new build. This puts enormous financial stress, and risk on the person building. The rates should be covering all current and future infrastructure, not requiring developers to pay for it."

Submitter 42 was concerned about the affordability of section prices stating:

"This is a double dipping tax that will see section prices rise as developer pass on costs to people that will be paying rates anyway."

Submitter 43 indicated they had previously been charged development contributions and expressed confusion about whether they would face additional charges.

While **Submitters 63, 65, and 66** are grouped under Theme 3 for their alternative wording suggestions, their submissions also raised concerns about housing affordability, equal treatment, and transitional provisions which relate to the theme and are included for completeness. Key concerns raised included:

- That poorly structured contributions could slow growth and reduce housing supply (**Submitters 63, 65**)

- Questions about equal treatment regarding exemptions for Māori land status (**Submitters 63,64,65,66**)
- Suggestions that charges should be suspended while infrastructure delivery is prioritised (**Submitters 63, 65, 66**)

Staff Analysis

The concerns raised by these submitters largely address matter that were within the scope of the consultation on the draft UWDCP, which occurred between August and October 2025 and generated 257 submissions. That consultation process specifically sought feedback on matters including:

- The quantum and structure of development contribution charges
- Exemptions and the fact that the UWDCP does not provide remissions, including the policy decision to exempt residential development on Māori land
- Transitional arrangements and the commencement date
- The impact of development contributions on housing affordability and development viability

Council considered these matters in detail when adopting the UWDCP on 7 October 2025, making amendments to address submitter concerns including bringing the commencement date forward to 29 May 2026 to ensure that it was operative before the notified District Plan came into effect, and clarifying the land-status basis for Māori land exemptions.

The current consultation specifically asked for feedback on the proposed wording amendment to the RFP. The consultation materials clearly indicated that this was a procedural amendment to enable the implementation of the already adopted UWDCP. The scope of this consultation was therefore limited to whether the proposed words accurately and appropriately reflect Council's decision to reinstate development contributions.

Matters relating to the substantive provisions of the UWDCP itself, including charge levels, exemptions, and broader funding strategy, are outside the scope of this amendment consultation. These matters were thoroughly canvassed in the earlier, more extensive consultation process and are reflected in the adopted policy.

The suggestion by **Submitters 63, 65, and 66** for alternative wording that would “continue to suspend” development contributions while “prioritising efficient infrastructure delivery” represents a fundamental policy reversal than a wording refinement. That decision was made following the comprehensive consultation and analysis of the UWDCP. The purpose of the RFP amendment is to enable implementation of that decision, not to revisit the policy choice itself.

Regarding concerns about equal treatment and exemptions raised by **Submitters 63, 64, 65, and 66**:

The UWDCP provides exemptions based on the legal status of the land as defined under Te Ture Whenua Māori Act 1993, not on the ethnicity of applicants, this matter was comprehensively addressed under **clause 34.4** of the UWDCP. This land-status based approach was confirmed as legally sound during the UWDCP development process and

aligns with section 102(3A) of the LGA, which requires development contributions policies to support the Preamble of Te Ture Whenua Māori Act 1993. The RFP amendment does not alter or affect these provisions.

Theme 2 Staff Recommendation

Council staff recommend no changes to the proposed amended wording in response to these submissions. The concerns raised, while sincerely held, relate to matters outside the scope of this consultation and were addressed through the section 83 LGA special consultation process that occurred prior to Council adoption of the UWDCP 2025.

Theme 3: Request For Alternative Wording

Submissions Received

Eight submitters who selected “Other” provided specific suggestions to change the proposed wording, or to retain or refine the existing RFP text. These submissions focused on clarity, signalling, language, and the relationship between the RFP and Council’s wider policy position on development contributions.

Submitter 28 expressed concern that “the wording used have two meanings,” and considered the transition from ‘suspend’ to ‘reinstate’ unclear without further explanation.

Submitter 19 requested that Council “use the old wording,” signalling a preference to retain the current RFP text that continues the suspension of development contributions collection for this Long Term Plan period.

Submitter 21 suggested a technical refinement to the second sentence to improve clarity around outstanding contributions, stating that adding words such as ‘continue to be payable’ would better express the intention that pre-2015 charges remain due.

Submitters 63, 65 and 66 proposed identical alternative wording:

“The Council will continue to suspend the charging of development contributions for this LTP period while prioritising efficient infrastructure delivery, affordability, and growth-enabling policies. Outstanding contributions charged prior to the suspension of the 2015 Development Contributions Policy will continue to be received.”

These submitters argued that this wording would better reflect a cautious approach, signal Council’s broader strategic intentions, and avoid reinstating charges ahead of perceived progress on infrastructure delivery and affordability.

Submitter 20 raised concerns about the use of te reo Māori in the UWDCP title, stating: “*using Maori in the titles does not help anyone to understand what it is.*” and requesting a clearer English description of development contributions. **Submitter 26** similarly commented that ‘*one language everybody understands only . problems happen when direct translation is ambiguous*’, highlighting concerns about potential confusion arising from bilingual or translated wording.

Staff Analysis

Taken together, the submissions under this theme fall into three main strands:

1. Requests to retain or restate existing suspension of development contributions,
2. Suggested technical refinements to the proposed text, and
3. Concerns about language and the accessibility of policy wording.

Requests to 'use the old wording' or to 'continue to suspend' development contributions (**Submitters 19, 63, 65, 66**) would have the effect of reversing Council's adopted policy directions rather than refining the expression of that direction. Council resolved on 7 October 2025 to adopt the UWDCP 2025 and to commence charging development contributions from 29 May 2026. The RFP must accurately record that decision and enable its implementation. Retaining the current RFP wording, which signals suspension, or adopting alternative wording that continues the suspension, would create direct conflict between the RFP and the UWDCP as well as introduce legal compliance issues along with policy uncertainty.

The suggested technical refinement from **submitter 21**, to clarify that outstanding contributions 'continue to be payable', is consistent with Council's intent and could be addressed as a minor drafting improvement if Council wishes.

The substantive effect of the second sentence in the proposed wording is already that pre-2015 development contributions remain receivable, and this is supported by the existing practice of continuing to collect those charges. Staff consider that any additional wording should be treated as a minor presentational change rather than a policy change and, if adopted, could be implemented under the Chief Executive's delegated authority to correct minor drafting or presentation errors.

Concerns about language accessibility and the use of te reo Māori (**Submitters 20 and 26**) relate more to how policy titles and supporting material are presented than to the specific enabling sentence in the RFP. The operative wording consulted on is short, plain English, and clearly states that Council has resolved to reinstate development contributions for this Long Term Plan and that outstanding contributions remain receivable. This meets the LGA requirement (sections 102 and 103 LGA) or clear identification of funding mechanisms in the RFP. Council's broader commitment to te reo Māori and bilingual naming is given effect across a range of documents and can continue to be managed through naming conventions, glossaries, and explanatory material without altering the core enabling sentence in the RFP.

There is no ambiguity in these statements. Each serves a distinct purpose, and together they provide complete information about Council's position on development contributions. This eliminates any possibility of misunderstanding about Council's current position.

Regarding the alternative wording proposed by Submitters 63,65 and 66:

This suggestion would fundamentally contradict Council's adopted UWDCP policy position rather than merely refining the expression of that position. Council resolved on 7 October 2025 to adopt the UWDCP 2025 and to commence charging development contributions from 29 May 2026. The proposed alternative wording would indicate a continued suspension, which directly conflicts with that resolution.

The RFP must accurately reflect Council’s actual policy decisions. The suggested alternative wording would create a disconnect between what Council has decided (to reinstate development contributions) and what the RFP states (that contributions remain suspended). This would undermine policy coherence and create confusion for developers, ratepayers, and staff about what policy framework actually applies.

In summary, the alternative wording requests either:

- Conflict with Council’s adopted decision to reinstate development contributions,
- Introduce aspirational or strategic language more appropriately located in the Long Term Plan, Infrastructure Strategy or UWDCP, or
- Related to presentational issues that can be addressed without changing the core enabling wording.

Theme 3 Staff Recommendation

Council staff recommend no substantive changes to the proposed amended wording in response to Theme 3 submissions. The alternative wordings that would continue the suspension of development contributions or materially alter the policy signal are inconsistent with Council’s adopted UWDCP 2025 and would undermine policy coherence and legal certainty including compliance with the LGA.

If Council wishes to respond to **Submitter 21’s** concern about clarity, staff consider that a minor drafting refinement to the second sentence (for example, clarifying that existing contributions ‘continue to be payable’ or ‘remain due and payable’) could be made under delegated authority without changing the policy intent.

No other changes are recommended.

Theme 4: Opposition To Enabling Development Contributions

Submissions Received

One submitter (**Submitter 55**) explicitly opposed the amendment, stating:

“I do not support amending the Finance and Revenue Policy because the amendments effect is to enable Development Contributions.”

This represents clear opposition to the policy mechanism itself rather than concerns about the specific wording of the amendment.

Staff Analysis

Submitter 55’s opposition is directed at the fundamental policy decision to collect development contributions, rather than at the proposed wording amendment specifically. Council resolved this policy question on 7 October 2025 when it adopted the UWDCP 2025 following a section 83 LGA Special consultation process and analysing the 257 submissions it received.

That consultation process provided the community with a comprehensive level of information and opportunity to consider whether development contributions should be reinstated in the Far North District. Council carefully considered the arguments for and against development contributions, including concerns about impacts on development viability, housing affordability, and district

growth. The decision to adopt the UWDCP reflected Council's determination and public support that 'growth pays for growth', and that the funding mechanism outweighed the concerns, particularly given the substantial infrastructure investment required to support growth in areas like Kerikeri-Waipapa.

The current consultation on the RFP amendment serves a different purpose. It implements Council's already made decision by updating the enabling policy language. While **Submitter 55's** opposition to development contributions generally is noted, this consultation is not the appropriate forum for revisiting that fundamental policy choice. Council has established processes for reviewing its strategic and financial policies, and the UWDCP will be subject to regular review and will be considered as part of future Long Term Plans processes.

It is worth noting that **Submitter 55** represents 1.6% of the total submissions received on this amendment. In contrast, 78.1% of submitters supported the proposed wording that enables the collection of development contributions and many of those supporters specifically referenced the fairness and appropriateness of reinstating contributions after an 11-year suspension.

Theme 4 Staff Recommendation

Council staff recommend no changes to the proposed amended wording in response to this submission. The fundamental policy decision to reinstate development contributions has been made through an appropriate consultation process. This amendment consultation appropriately focusses on implementing that decision through clear policy wording.

Theme 5: Out Of Scope Submissions

Submissions Received

The RFP amendment consultation was clearly scoped to address whether the proposed wording accurately reflect Council's decision to reinstate and collect development contributions, rather than to consider the substantive content of the UWDCP 2025 or wider strategic settings. The consultation material directed submitters to comment on the specific wording or to suggest alternative wording if they considered different text more appropriate.

Submitter 62 (Disabled Persons Assembly NZ) provided a comprehensive submission supporting the reinstatement of development contributions but concentrating on accessibility outcomes, Universal Design, the impact of rates and infrastructure costs on disabled people (who are more than likely to be on low incomes), and the role of the Disability Advisory Group in decision-making. The submissions proposed actions such as promoting Universal Design to developers, engaging barrier-free advisors, and involving the Disability Advisory Group in decisions about accessible community infrastructure and facilities.

Submitter 64 addressed the policy at a strategic level, including support for development contributions in principle. Concerns about housing affordability, equal treatment between different types of land ownership, the need for broader growth funding strategy and stronger central government advocacy on mechanisms such as GST and infrastructure funding were the matters raised in this submission. While these points are relevant to Council's overall approach to growth funding and equity, they relate to the design and application of development contributions and other funding tools, not to the wording amendment of the RFP.

Staff Analysis

The submissions in this theme provide useful perspectives on how development contributes and related funding tools affect disabled people, ratepayers, and different development scenarios, but they do not raise issues with the clarity or correctness of the proposed RFP wording. The proposed amendment is a procedural change to align the RFP with Council's earlier decision to adopt the UWDCP 2025 and reinstate development contributions from 29 May 2026.

The accessibility and Universal Design matters raised by **Submitter 62** are primarily implementation issues for infrastructure planning, development assessment, and broader accessibility strategy work. These can be addressed through operation practice and do not require changes to the enabling wording in the RFP.

Similarly, **Submitter 64's** concerns about housing affordability, equal treatment, and the need for broader growth funding reform related to the structure and application of the UWDCP and Council financial strategy, which were canvassed through the 2025 draft UWDCP consultation process. **Submitter 64's** matters are more appropriately considered as part of future Long Term Plan and policy review processes.

Neither submission identified ambiguity in the proposed amended RFP sentence or suggests wording that would better express Council's existing decision to reinstate development contributions.

Theme 5 Staff Recommendation

Council staff recommend no changes to the proposed amended wording in response to Theme 5 submissions. The matters raised, while important in their own contexts, fall outside the scope of this consultation and do not provide a basis for amending the current proposed wording in the RFP.

Staff recommend that the points raised by **Submitters 62** and **64** be referred to the relevant operation and policy teams for consideration in the implementation of the UWDCP 2025, future affordability and rating work, and ongoing accessibility and community wellbeing initiatives.

Conclusion

The consultation on the proposed RFP amendment demonstrated strong public support, with 78.1% of submitters (50 out of 64) explicitly endorsing the updated wording that reinstates development contributions as a funding mechanism for this Long Term Plan period. The proposed wording resolves the ambiguity in the current policy text, which refer to a suspension of development contributions while still collecting legacy charges and provides a clear policy foundation for implementing the UWDCP 2025 from 29 May 2026.

Submissions that did not support or were uncertain about the wording largely raised matters outside the narrow scope of this consultation, including:

- the level and structure of development contributions
- exemptions (particularly in relation to Māori land)
- housing affordability
- infrastructure delivery sequencing

- accessibility and Universal Design, and
- wider growth funding and equity questions.

These issues were, or are more appropriately, considered through the consultation process for the draft UWDCP 2025, future Long Term Plan processes, and related policy and operational work, rather than through this procedural amendment to the RFP.

Overall, the amended wording is clear, unambiguous, and accurately reflects Council’s adopted policy position that development contributions are to be reinstated. It supplies the necessary enabling language in the RFP without duplicating operational detail that properly sits within the UWDCP and associated implementation frameworks.

Table 2: Recap of Staff recommendations for each Submission Theme.

Theme	Staff Recommendation
Theme 1: Support For Clarified and Strengthened Wording	Council Staff recommend no changes
Theme 2: Concerns About Development Contribution Impacts	Council Staff recommend no changes
Theme 3: Request For Alternative Wording	Council Staff recommend no changes
Theme 4: Opposition To Enabling Development Contributions	If Elected Members wish to make any minor changes to direct the changes be made under the Chief Executives delegation. Staff are recommending no changes.
Theme 5: Out Of Scope Submissions	Staff recommend no changes, and that the points raised by Submitters 62 and 64 be referred to the relevant operation and policy teams for consideration.

Final Recommendation

Staff consider the amended wording clear, legally robust, and aligned with Council’s October 2025 decision to reinstate development contribution charges. Staff are recommending the proposed wording amendment for the RFP be adopted without substantive change, and any minor drafting refinements delegated to the Chief Executive.

APPENDIX 1 – LIST OF SUBMISSIONS RECEIVED

Submitter ID	Organisation
1	Individual Submission
2	Individual Submission
3	Individual Submission
4	Individual Submission
5	Individual Submission
6	Individual Submission
7	Individual Submission
8	Individual Submission
9	Individual Submission
10	Individual Submission
11	Individual Submission
12	Individual Submission
13	Individual Submission
14	Individual Submission
15	Individual Submission
16	Individual Submission
17	Individual Submission
18	Individual Submission
19	Individual Submission
20	Individual Submission
21	Individual Submission
22	Individual Submission
23	Individual Submission
24	Individual Submission

25	Individual Submission
26	Individual Submission
27	Individual Submission
28	Individual Submission
29	Individual Submission
30	Individual Submission
31	Individual Submission
32	Boarder Real Estate Northland
33	Individual Submission
34	Individual Submission
35	Individual Submission
36	Individual Submission
37	Individual Submission
38	Individual Submission
39	Individual Submission
40	Retired Geotechnical Engineer
41	Individual Submission
42	Individual Submission
43	Individual Submission
44	Individual Submission
45	Individual Submission
46	Individual Submission
47	Individual Submission
48	Individual Submission
49	Individual Submission
50	Individual Submission

51	Individual Submission
52	Individual Submission
53	Vision Kerikeri
54	Individual Submission
55	Individual Submission
58	Ōtangaroa Landcare/Forest & Bird Northland Conservation Advocate
59	Resident, ratepayer
60	Individual Submission
61	Individual Submission
62	Disabled Persons Assembly New Zealand Inc
63	Individual Submission
64	Individual Submission
65	Ototere Farms Ltd
66	Individual Submission