Membership:

Kahika - Mayor Moko Tepania - Chairperson
Cr Chicky Rudkin
Cr Arohanui Allen
Cr Rachel Baucke
Cr Ann Court
Cr Felicity Foy
Cr Hilda Halkyard-Harawira
Cr Kelly Stratford
Cr Davina Smolders
Cr Tāmati Rākena
Cr John Vujcich

Te Kaunihera o Te Hiku o te Ika
Far North District Council

AGENDA

Supplementary Reports

Ordinary Council Meeting

Thursday, 11 December 2025
Time: 10:00 AM
Council Chamber
Memorial Ave
Kaikohe

Te Paeroa Mahi / Order of Business

5 HE PĀNUI WHAKAMŌTINI / NOTICE OF MOTION

5.2 NOTICE OF MOTION - SEALING OF MARAE AND KŌHANGA REO

File Number: A5312369

I, Hilda Halkyard-Harawira, give notice that at the next Ordinary Meeting of Council to be held on 11 December 2025, I intend to move the following motion:

MŌTINI / MOTION

That Council;

a) approve sealing 250 metres of unsealed road either side (i.e, up to 500m) of 8 Kōhanga Reo education sites/Marae (as per list 1 below), within the 2025/28 term;

b) direct the Chief Executive to ensure staff include the 37 Marae (as per list 2 below) in the prioritisation matrix used for seal extension projects, ensuring their proximity and community significance are appropriately weighted in the algorithm used to rank unsealed roads; taking into account the heavy usage of vehicles during tangihanga and community hui gatherings.

c) request that the resourcing, design, and delivery of sealed access to these Marae be incorporated into all of the Council's work programmes, including the Infrastructure Strategy, Roading Maintenance Plans, and Seal Extension Programme.

d) further resolve that the inclusion of these Marae be reflected in the following planning documents:

- **i) the Long-Term Plan (LTP) 2024–2027, with appropriate budget allocation and prioritisation,**
- **ii) the Annual Plan, to ensure short-term implementation and accountability,**
- **iii) the District Plan, to support long-term infrastructure and land use planning that enhances Marae accessibility and resilience.**

TAKE / RATIONALE

To advocate for the prioritisation and resourcing of road sealing projects in front of Kōhanga Reo and Marae across the Far North District, recognising their educational, cultural, social, and community significance.

The Far North District has a total of 2,508 km of roads, of which only 35% (858 km) are sealed. This means 65% (1,650 km) remain unsealed, disproportionately affecting rural communities, many of which are Māori and located near Kōhanga Reo and Marae.

Far North District Council (FNDC) does not have a standalone policy that mandates sealing roads in front of Kōhanga Reo and Marae. However, several foundational documents and programmes explicitly include Marae and Kōhanga Reo as a prioritisation factor in road sealing decisions.

For example the:

Priority Seal Extensions Programme;

- was launched in 2019 to seal roads that *did not qualify for Waka Kotahi subsidies; and* −
- uses a Dust Prioritisation Matrix that ranks roads based on;
  - Traffic volumes

- Number of residents
- Presence of schools, Marae and other community facilities *(e.g. Parapara Toatoa Road was sealed up to and including Parapara Marae).*

Dust Prioritisation Matrix;

- this matrix measures 22 criteria including proximity to Marae;
- is used to ensure transparent and fair selection of roads for sealing, and notes that roads near Marae are considered *high priority* due to community impact.

Longterm Plan (LTP) commitments;

- FNDC has committed $11 million over the last 10 years to seal critical risk roads that were selected based on community concerns, including dust near Marae.

Unsealed roads pose serious health and safety risks:

- **Dust Pollution:** Dust from gravel roads contaminates roof-collected water supplies, infiltrates homes, and settles on clothing and food. This is especially harmful to young children and kaumātua, who are more vulnerable to respiratory issues.
- **Road Hazards:** Unsealed roads are prone to potholes, corrugation, and instability when wet, increasing the risk of vehicle accidents, especially for school transport and kaumātua mobility.
- **Emergency Access:** During severe weather events, unsealed roads are often impassable, delaying emergency services and isolating communities

Cultural and Educational Significance

Marae and Kōhanga Reo are cultural anchors and civil defence sites for Māori and rural communities:

- Marae serve as places of gathering, ceremony, and refuge. Their accessibility is vital for tangihanga, hui, and whānau support.
- Kōhanga Reo are foundational to the revitalisation of te reo Māori, and their connection to Marae reinforces intergenerational learning and tikanga.
- Sealing roads to these sites affirms the mana and dignity of Māori institutions and supports Te Tiriti-based infrastructure planning.

Educational Equity - Kōhanga Reo are 40 years old

Unsealed roads hinder access to early childhood education:

- **Transport Barriers:** Whānau may avoid sending tamariki to Kōhanga Reo due to unsafe or unreliable road conditions, especially in winter.
- **Attendance and Retention:** Poor access contributes to lower attendance rates, undermining the goals of Māori-medium education and language revitalisation.
- **Equity and Inclusion:** Sealing roads to Kōhanga Reo ensures equal access to education, aligning with national outcomes for Māori success as Māori.

Strategic and Economic Rationale

While sealing all unsealed roads would cost an estimated $500 million, FNDC has acknowledged that targeted sealing is feasible and necessary. It

Prioritising roads to Marae and Kōhanga Reo:

- Aligns with existing council commitments to seal roads where the need is greatest.
- Supports community wellbeing and reduces long-term health costs.
- Demonstrates partnership with Māori, fulfilling obligations under Te Tiriti o Waitangi.

Conclusion

Sealing roads to Marae and Kōhanga Reo is not just a matter of infrastructure, it is a matter of justice, equity, and cultural respect. It enhances health, safety, education, and cultural resilience for Māori communities and reflects a commitment to inclusive and future-focused planning.

I have highlighted these roads in each of my Elected Member reports since the **11th December 2023** and staff have not considered or advanced this matter since then:

- Council Agenda 11 December 2023 - page 133
- Council Agenda 14 March 2024 - page 223
- Council Agenda 11 April 2024 – page 22 (supplementary agenda)
- Council Agenda 9 May 2024 – page 104
- Council Agenda 13 June 2024 – page180
- Council Agenda 11 July 2024 – pages 146 & 147
- Council Agenda 8 August 2024 – page 234
- Council Agenda 12 September 2024 – page 479
- Council Agenda 17 October 2024 – page 501
- Council Agenda 14 November 2024 – page 185
- Council Agenda 12 December 2024 – page 488
- Council Agenda 13 February 2025 – page 258
- Council Agenda 13 March 2025 – page 154
- Council Agenda 10 April 2025 – page 242
- Council Agenda 8 May 2025 – page183
- Council Agenda 5 June 2025 – pages 187 & 188
- Council Agenda 3 July 2025 – pages 383 & 384
- Council Agenda 31 July 2025 – pages 565 & 567

Furthermore there have been numerous reports to Council on FNDC Seal Extension Prioritisation. Some examples are:

LIST 1 - 8 KŌHANGA REO/ MARAE COMBINATION ROADS IN THE FAR NORTH

1	Whangapē Kōhanga Reo , Kotahitanga Marae	Herekino Rd, Whangapē
2	Pā Arapeta , Ngāti Manawa Marae, Panguru	340 West Coast Road
3	Whakamaharatanga Kōhanga Reo, Whakamaharatanga Marae, Waimamaku	14 Waimamaku Beach Rd, Waiotemarama
4	Taurangi Kōhanga Reo, Waimate North	140 Whakataha Road
5	Maungataniwha Kōhanga Reo, Ngāpuhi Marae	9 Iwitaua Rd, Mangamuka
6	Mōtatau Kōhanga Reo,	103 Henare Rd, Mōtatau
7	Matawaia Kōhanga Reo, Matawaia Marae Kawakawa	Pokapū Rd, RD1, Kawakawa.

8	Wharepunga Kōhanga Reo, Pukerata Marae ,	613 Wharepunga Rd, Otaua

LIST 2 - MARAE LOCATED ON UNSEALED ROADS IN FNDC AREA.

1	Haititaimarangai Marae – Karikari	176 Whatuwhiwhi Road,
2	Wainui Marae – Ahipara	17 Wainui Road , 0481
3	Rangikohu Marae – Herekino Kaitaia	7 Settlement Way, 0481
4	King Hori Marae Owhata	Owhata, Herekino
5	Morehu Marae – Pawarenga	10 –12 Te Riha Roadway0496
6	Waiparera Marae – Kohukohu	384 Rangi Point Road 0492
7	Motuti (Tamatea) Marae – Kohukohu	325 Motuti Rd RD2 0492
8	Matihetihe (Mitimiti) Marae	3733 Hohaia Road Mitimiti.
9	Te Arohanui Marae – Mangataipa	203 Mangataipa Road, Mangamuka Bridge 0476
10	Ngāi Tupoto Marae – Motukaraka	201 Motukaraka Point, 0491
11	Pateoro (Te Karae) Marae – Kohukohu	414 Kohukohu Road ,0491
12	Pikipāria Marae – Kohukohu	53 Smith Deviation Road,0491
13	Piki Te Aroha Marae – Rāhiri	46 Harris Road Rāhiri 0475
14	Motukiore Marae – Hōreke	651 Motukiore Road, 0475
15	Puketawa Marae – Utakura	1400 Hōreke Road , 0475
16	Rangatahi Marae – Hōreke	1560 Hōreke Road Maraeroa , 0475
17	Otātara Marae – Waimā	36 Otātara Marae Rd, 0473
18	Moehau – Waimā	2 Mission Oak Road 0473
19	Mahuri Marae – Taheke, Kaikohe	154 Ramsay Road,
20	Kaingahoa (Mataraua) Marae – Kaikohe	945 Mataraua Road 0474
21	Ngai Tawake Marae – Mataraua	1235 Mataraua Road, 0474

22	Te Huehue Marae – Ōtaua	31 Stewart Road,
23	Mokonuiārangi Marae – Maraeroa	1627 Hōreke Road , 0475
24	Ōkorihi Marae –Te Iringa	34 Te Iringa West Road, 0473
25	Te Patunga Marae – Kāeo	585c Pupuke Mangapa Road 0479
26	Tahaawai Marae –Pupuke	231 Weber Road Pupuke 0479
27	Pupuke (Te Huia) Marae – Otangaroa	11 Te Huia Marae Road, Pupuke , 0479
28	Waimahana Marae –Turn left at 227 Taupo Bay Road, drive for 8km (keep left) to Waimahana Bay. Drive along beachfront track to Marae (300 m up creek)	Waimahana Bay- Ngāti Kahu
29	Akerama Marae – Towai	19 Haile Rd,Hukerenui,0182
30	Mohinui Marae – Kawakawa 0281	234 Waiomio Road , 0281
31	Kaikou Marae – Matawaia	3923 Pipiwai Road 0281
32	Kaimaumau Marae , Waiharara	Kaimaumau, 0627
33	Taemaro,	HIhI, 0295
34	Matai Aronui, Whirinaki	Wikaira Rd, Whirinaki 0473
35	Te Piiti Marae, Omanaia	28 Omanaia Road, 0473
36	Tākou Marae	Tākou, 0295
37	Other Marae to be added if omitted from this list	

I commend this Notice of Motion to Council.

Mover: Kaikaunihera Hilda Halkyard-Harawira. **Seconded:** Kaikaunihera Babe Kapa & Tāmati Rākena.

ĀPITIHANGA / ATTACHMENTS

1. **Attachment 1 - 8 Kōhanga/Marae Combined Roads in FNDC Area - A5348009**
2. **Attachment 2 - Marae located on Unsealed Roads in FNDC Area - A5348010**

Hōtaka Take Ōkawa / Compliance Schedule: Completed by Democracy Services Staff

Meeting procedures are set out in the Local Government Act 2002 (LGA), the Local Government Official Information and Meetings Act 1987 (LGOIMA), and Standing Orders. Standing Orders Clause 26 outlines procedures for Notices of Motion.

Please note that nothing in this standing order removes the requirement to meet the provisions of Part 6, LGA with regard to consultation and decision-making.

Full consideration must been given to the provisions of the Local Government Act 2002 S77 in relation to decision making, in particular:

1. A Local authority must, in the course of the decision-making process,

   Seek to identify all reasonably practicable options for the achievement of the objective of a decision; and

   Assess the options in terms of their advantages and disadvantages; and

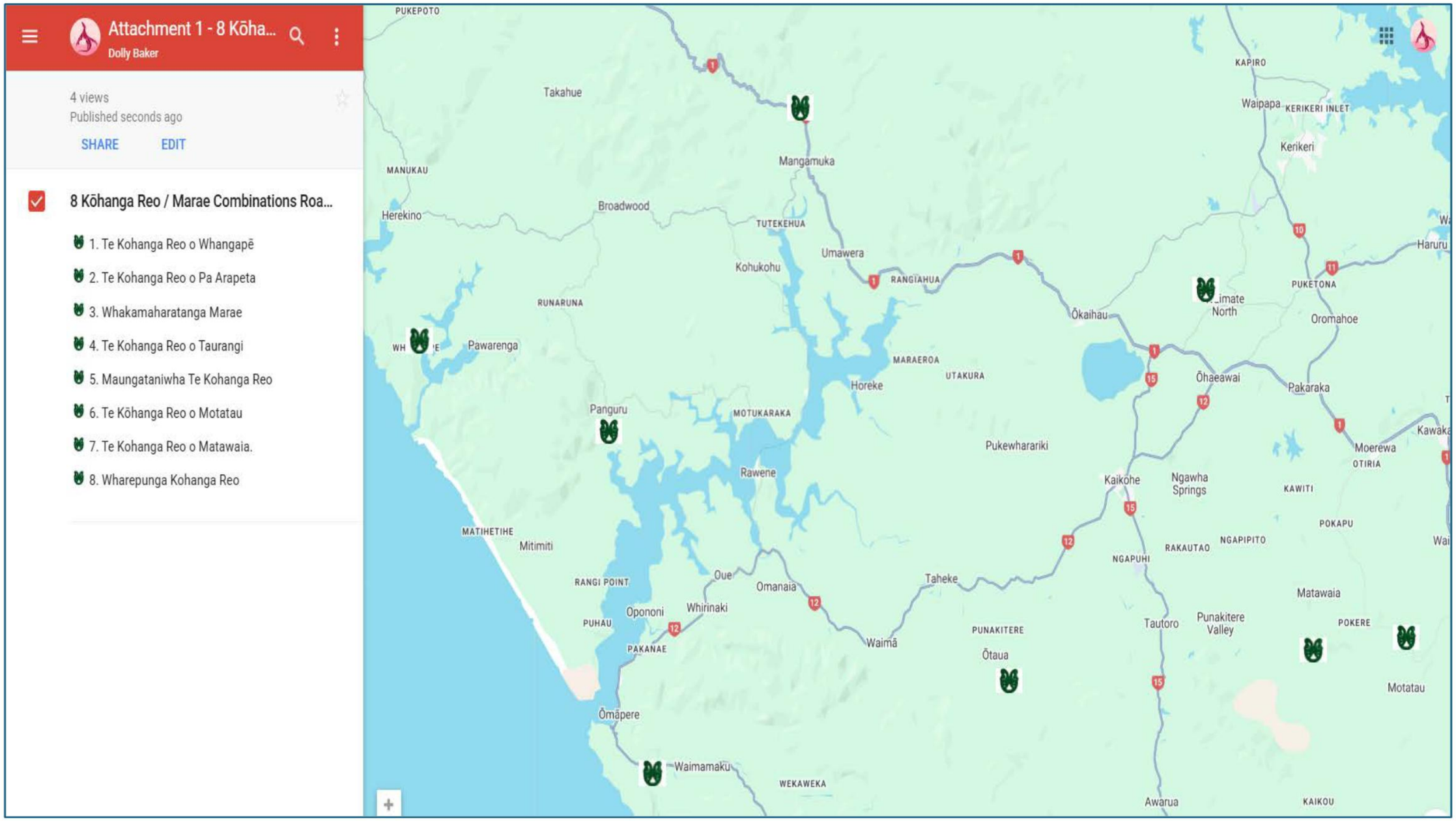
   If any of the options identified under paragraph (a) involves a significant decision in relation to land or a body of water, take into account the relationship of Māori and their culture and traditions with their ancestral land, water sites, waahi tapu, valued flora and fauna and other taonga.

This section is subject to Section 79 - Compliance with procedures in relation to decisions.

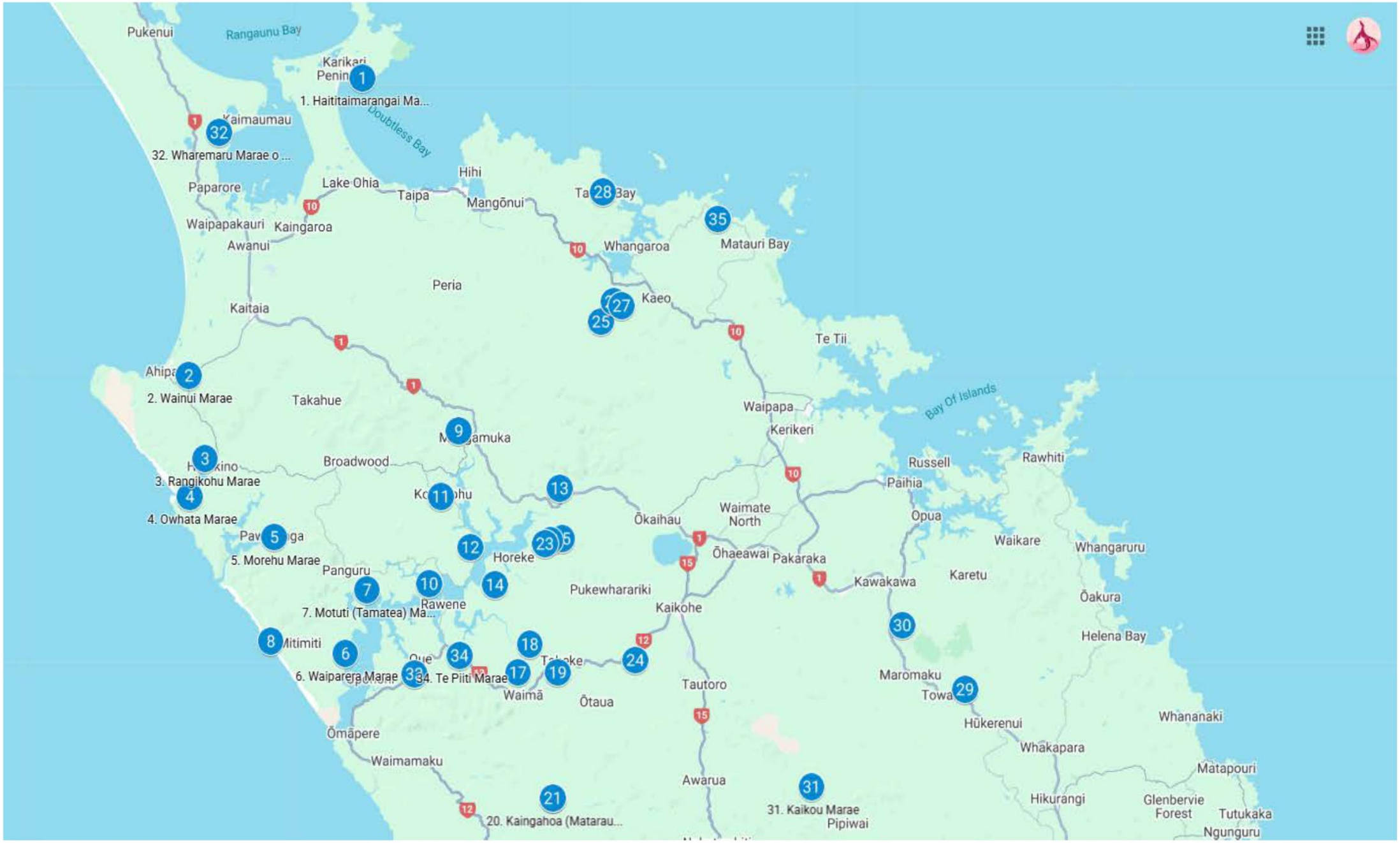
He Take Ōkawa / Compliance Requirement	**Aromatawai Kaimahi / Staff Assessment**
State the level of significance (high or low) of the issue or proposal as determined by the Council's Significance and Engagement Policy	This Notice of Motion is assessed as having a high level of significance under the Council's Significance and Engagement Policy, given its potential impact on community wellbeing, financial commitments, and strategic infrastructure planning.
State the relevant Council policies (external or internal), legislation, and/or community outcomes (as stated in the LTP) that relate to this decision.	Local Government Act 2002 Activity Management Plan (AMP) Dust Control Policy
State whether this issue or proposal has a District wide relevance and, if not, the ways in which the appropriate Community Board's views have been sought.	Because the Notice of Motion and associated decisions affect communities district-wide, consultation and engagement is undertaken at the Council level. If specific Community Board views are required for particular sites or implementation phases, these will be sought as part of the ongoing engagement and reporting process.
State the possible implications for Māori and how Māori have been provided with an opportunity to contribute to decision making if this decision is significant and relates to land and/or any body of water. State the possible implications and how this report aligns with Te Tiriti o Waitangi / The Treaty of Waitangi.	The proposal directly affects Māori communities, particularly those associated with Marae and Kōhanga Reo.
Identify persons likely to be affected by or have an interest in the matter, and how you have given consideration to their views or preferences (for example – youth, the aged and those with disabilities).	Māori communities, especially those associated with Marae and Kōhanga Reo Residents living near unsealed roads, including rural families and property owners Youth and children attending Kōhanga reo, schools, and using school bus routes

	The aged and those with disabilities who may be more vulnerable to health impacts from dust and require reliable road access Community groups and organisations that use marae and other gathering places
State the financial implications and where budgetary provisions have been made to support this decision.	The financial impact of sealing and dust suppression at Marae and Kōhanga Reo sites will be outlined in the staff response The financial implications of this Notice of Motion will be determined by the response from staff. Final budgetary provisions will be made by Council
Chief Financial Officer review.	This report has not been reviewed by the CFO.

Attachment 1: 8 Kohanga Reo / Marae Combined Roads in the Far North



Attachment 2 - MARAE LOCATED ON UNSEALED ROADS IN FNDC AREA.



5.3 NOTICE OF MOTION - REVIEW OF MANA WHAKAHONO Ā ROHE AGREEMENT AND MEMORANDUMS OF UNDERSTANDING

File Number: A5497095

I, Councillor Davina Smolders, give notice that at the next Ordinary Meeting of Council to be held on 11 December 2025, I intend to move the following motion:

MŌTINI / MOTION

That the Far North District Council:

1. **Notes concerns that the Ngāpuhi Mana Whakahono a Rohe (MWaR) and the Te Rarawa and Ngāti Rēhia Memoranda of Understanding may give rise to potential breaches of the Resource Management Act 1991, the Local Government Act 2002, the Regulatory Standards Act 2025, and the Far North District Council Significance and Engagement Policy.**
2. **Initiates a review of the Ngāpuhi MWaR and the Te Rarawa and Ngāti Rēhia MOUs to identify and report on any such potential breaches or areas of non compliance, including but not limited to issues of significance, consultation, transfer of powers, fettering of discretion, property rights, equality before the law, transparency of costs, and long term financial obligations.**
3. **Directs the Chief Executive to report back to Council with the findings of that review and clear options for addressing any identified breaches or risks, including any amendments, reconsideration or other remedial actions that may be required.**

TAKE / RATIONALE

Reasoning: Potential breaches
Based on the text of the signed Ngāpuhi Mana Whakahono a Rohe (MWaR) and the Te Rarawa and Ngāti Rēhia MOUs, assigning a “Medium” significance level to the Ngāpuhi MWaR is highly contentious and provides strong grounds to argue that the Council may have breached the Local Government Act 2002 (LGA), specifically regarding its Significance and Engagement Policy.

While the Council has carefully worded the document to avoid an immediate technical breach of the Resource Management Act 1991 (RMA), the “Medium” designation arguably circumvents the transparency requirements of the LGA.

Below is an analysis of why this designation is legally vulnerable.

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1. Breach of “Significance” under the LGA 2002

Under the LGA, a decision is “significant” if it has a high degree of importance to the district, involves large financial consequences, or affects strategic assets.

The “Medium” designation argument
The Council likely argues this is “Medium” because the MWaR itself is just a “relationship protocol” and a framework for future decisions, rather than a direct transfer of assets today. They rely on clauses such as clause 6.1, which says the Council only “commits to deliberating” on funding in the next Long Term Plan.

The counter argument: Why it should be “High” or significant
The MWaR contains commitments that fundamentally alter the governance structure of the district, which should trigger the “significant” threshold.

Transfer of powers under RMA section 33

- The text: Clause 8.0 explicitly sets up the process for the “transfer and delegation of powers and functions”. It states that upon request by Ngāpuhi, the parties “will discuss the potential for transfer of powers”.
- The breach concern: While it says “discuss”, clause 8.3 commits the parties to “agree a process and timeframe for facilitating the transfer”. By signing this, the Council has effectively pre determined that transfers will be facilitated if agreed, skipping the public debate on whether they should be transferred at all. A transfer of regulatory power is a change in the level of service, which triggers significance.

Irreversible constitutional change

- The text: Clause 5.0 mandates that Ngāpuhi representatives “will be appointed” to Council committees such as Te Kuaka.
- The breach concern: Altering the decision making body of the Council to include non elected appointees with voting rights is a matter of high public interest and constitutional significance. Labelling this “Medium” minimises the structural change to local democracy.

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2. The RMA “transfer of powers” trap

The Council has likely not yet breached the RMA, but the MWaR sets a pathway that may lead to a breach later.

RMA section 33 requirement

- The RMA states that a local authority may transfer functions to an iwi authority, but it must use the Special Consultative Procedure (section 33(4)(c) RMA).

The conflict

- By signing the MWaR under a “Medium” designation, without a Special Consultative Procedure, the Council has agreed to a forward work programme and resourcing to facilitate these transfers.

The argument

- Ratepayers can argue that the Council is using the MWaR to “bake in” the outcome of the section 33 transfer before the public consultation actually happens. Once the Council has contractually agreed to “facilitate the transfer” in the MWaR, the future public consultation risks becoming a sham and may be viewed as predetermination.

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3. Fettering of discretion in administrative law

A Council cannot sign a contract that prevents it from making a free decision in the future. This is the principle against fettering discretion.

- The clause: Clause 6.1 states the Council “commits to deliberating on the inclusion of specific resourcing in its next Long Term Plan”.
- The issue: While “commits to deliberating” sounds safe, clause 6.2 goes further, stating the Council “commits to providing annual funding” subject to clause 6.1.
- The breach concern: If the Council has signed a binding contract (the MWaR) promising funding before the Long Term Plan (LTP) process has occurred, it has effectively rendered the LTP public consultation meaningless regarding those line items. This arguably breaches the principles of the LGA regarding open decision making.

In addition, Waitangi Tribunal decisions are not binding on their own. However, once a Council signs a binding MWaR or MOU that agrees to “give effect” to those decisions, it effectively converts non binding Tribunal findings into binding local government policy. This bypasses the Crown and creates a binding obligation on the Council without going through a Special Consultative Procedure for the transfer of land or interests pursuant to a Waitangi Tribunal decision.

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4. Comparison with Te Rarawa and Ngāti Rēhia MOUs

The Ngāpuhi MWaR is significantly more aggressive and detailed than the other two arrangements, which makes the “Medium” designation even more questionable.

- Ngāti Rēhia MOU: This is largely aspirational. It focuses on vision, values, and meeting annually. It mentions designing a work programme but lacks the specific statutory provisions and mechanisms found in the Ngāpuhi document.
- Te Rarawa MOU: This focuses mainly on relationship and consultation.
- Ngāpuhi MWaR: This explicitly invokes RMA section 33 (transfer of powers) and section 36B (joint management) and it sets specific governance arrangements and work programmes.

Conclusion: The Ngāpuhi document is a statutory instrument under the RMA (a Mana Whakahono a Rohe), whereas the others are common law MOUs. Treating the Ngāpuhi MWaR with the same "Medium" significance as a standard MOU is a misclassification of its legal weight.

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5. Summary of potential breaches

LGA Significance

- Council's likely defence: "It is just a protocol for talking, no assets are transferred yet."
- Ratepayer challenge: "It commits to a process of transferring regulatory powers in clause 8, which is a significant change in levels of service."

LGA Consultation

- Council's likely defence: "We will consult on the funding in the 2027 LTP under clause 6.1."
- Ratepayer challenge: "Signing the MWaR now creates a contractual liability that pre determines the LTP outcome, making consultation a sham."

RMA section 33

- Council's likely defence: "We have not transferred powers yet, we have only agreed to discuss it."
- Ratepayer challenge: "Clause 8.3 obligates you to facilitate the transfer, signalling intent without the required Special Consultative Procedure."

The Ngāpuhi MWaR explicitly invokes RMA section 33 (transfer of powers) and section 36B (joint management). A decision to enter an agreement that facilitates the future transfer of regulatory functions fundamentally alters the level of service provided by the Council. Under the LGA, this triggers the significance threshold. By classifying this as "Medium", the Council has avoided the Special Consultative Procedure normally required for such constitutional changes.

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6. Regulatory Standards Act 2025

There are also concerns regarding alignment with the newly enacted Regulatory Standards Act 2025.

The MWaR commits the Council to "give effect" to Waitangi Tribunal findings and signals a move toward the transfer of powers under section 33 of the RMA. This raises questions about consistency with the Principles of Responsible Regulation now set in law.

Specific concerns include:

1. **Impairment of property rights and compensation**
   Section 8 of the Regulatory Standards Act states that regulation should not impair property rights without good justification and fair compensation.
   Questions that arise include:
   - Has the Council conducted a legal analysis to determine if new planning rules or wāhi tapu designations arising from this MWaR will trigger a requirement for the Council to financially compensate affected landowners for loss of property value or utility
   - If so, where is this potential liability accounted for in the Long Term Plan
2. **Equality before the law**
   The Act requires that every person is equal before the law.
   - If the Council transfers section 33 regulatory powers to a non elected iwi authority, how does the Council justify granting regulatory privileges to a specific group based on descent

- Has the Council received advice on whether this arrangement is consistent with the "equality before the law" principle of the Regulatory Standards Act

3. **Regulatory Standards Board review**
   - Will the Council voluntarily submit its proposed implementation plan for this MWaR to the new Regulatory Standards Board for an independent review to ensure it does not breach the statutory principles of responsible regulation

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7. The "significance" trap: where it becomes unlawful

The Council breaches the law, specifically the Local Government Act 2002, when a decision or spending triggers the Council's Significance and Engagement Policy and the required processes are not followed.

For the Far North District Council, a decision is typically "significant" and requires LTP or public consultation if it:

1. Involves unbudgeted operational spending that exceeds 2.5 percent of total rates, which is approximately 2.5 to 3 million dollars.
2. Involves transferring ownership or control of a strategic asset, such as a park, water infrastructure, or decision making power over such assets.
3. Creates large divisions in community interest or is highly controversial.

The concern is that while initial spending on meetings or relationship activities may appear modest, the signed MWaR commits the Council to a path that will inevitably trigger these thresholds later. By signing it now without explicit LTP approval, Council may be effectively bypassing its own Significance and Engagement Policy.

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8. How the Regulatory Standards Act changes this

The Regulatory Standards Act provides a new lens to challenge "business as usual" spending and regulatory design.

A. The transparency principle

- The rule: The Act requires that the process of making law, including secondary legislation and regulatory frameworks derived from these agreements, is transparent.
- The breach concern: If the Council is spending funds to develop a regulatory framework through the MWaR that will bind ratepayers, but is hiding the cost of that development in general operational budgets, this breaches the transparency principle. A full accounting of all workstream costs associated with the Ngāpuhi MWaR should be available.

B. The "taxes and charges" principle

- The rule: Taxes and rates should only be used to provide benefits that are linked to the payer or to the general public good.
- The breach concern: If the Council is paying iwi representatives fees to sit at the table that far exceed normal or reasonable meeting costs, for example one thousand dollars per hour compared to standard meeting fees, this may be viewed as a transfer of wealth rather than legitimate cost recovery. Under the Regulatory Standards Act this could be challenged as an unreasonable use of levied funds.

C. Stewardship duty

- The rule: Regulators, including councils, have a duty of stewardship to ensure systems remain fit for purpose.
- The breach concern: Entering into a binding agreement that creates a perpetual financial liability, for example resourcing iwi participation indefinitely, without explicitly budgeting for it in the LTP is a failure of financial stewardship.

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9. Legal versus illegal actions summary

- Paying iwi meeting fees, for example around fifty thousand dollars per year, is likely legal and falls under the Chief Executive's operational authority within existing budgets.

- Signing an MWaR that promises ongoing resourcing may be technically legal at the point of signing, but it creates an unfunded mandate that effectively forces future Councils to pay.
- Transferring decision making powers under RMA section 33 without a Special Consultative Procedure is unlawful, because transferring powers is significant and must go through LTP or Annual Plan processes.
- Hiding the total cost of the MWaR across multiple budgets risks breaching the Regulatory Standards Act transparency principles, because it prevents ratepayers from seeing the true cost.

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10. Executive sign off

It is noted that neither the Chief Executive nor the Chief Financial Officer signed off on the information submitted to Council for consideration. Given the highly complex nature of the intersection between the various statutes and the complexity of the potential financial obligations that may bind Councils into the future, the highest level of executive guidance would have been very useful to Council. As a result, the understanding of all implications of the agreements by elected members may have been very limited.

I commend this Notice of Motion to Council.

ĀPITIHANGA / ATTACHMENTS

Nil

Hōtaka Take Ōkawa / Compliance Schedule: Completed by Democracy Services Staff

Meeting procedures are set out in the Local Government Act 2002 (LGA), the Local Government Official Information and Meetings Act 1987 (LGOIMA), and Standing Orders. Standing Orders Clause 26 outlines procedures for Notices of Motion.

Please note that nothing in this standing order removes the requirement to meet the provisions of Part 6, LGA with regard to consultation and decision-making.

Full consideration must been given to the provisions of the Local Government Act 2002 S77 in relation to decision making, in particular:

1. A Local authority must, in the course of the decision-making process,
    a) Seek to identify all reasonably practicable options for the achievement of the objective of a decision; and
    b) Assess the options in terms of their advantages and disadvantages; and
    c) If any of the options identified under paragraph (a) involves a significant decision in relation to land or a body of water, take into account the relationship of Māori and their culture and traditions with their ancestral land, water sites, waahi tapu, valued flora and fauna and other taonga.
2. This section is subject to Section 79 - Compliance with procedures in relation to decisions.

He Take Ōkawa / Compliance Requirement	**Aromatawai Kaimahi / Staff Assessment**
State the level of significance (high or low) of the issue or proposal as determined by the Council's Significance and Engagement Policy	There is low degree of significance in receiving this Notice of Motion.
State the relevant Council policies (external or internal), legislation, and/or community outcomes (as stated in the LTP) that relate to this decision.	Local Government Act 2002; Resource Management Act (RMA) in 2017
State whether this issue or proposal has a District wide relevance and, if not, the ways in which the appropriate Community Board's views have been sought.	District-wide relevance. Community Board views have not been sought.
State the possible implications for Māori and how Māori have been provided with an opportunity to contribute to decision making if this decision is significant and relates to land and/or any body of water. State the possible implications and how this report aligns with Te Tiriti o Waitangi / The Treaty of Waitangi.	No direct implications identified.
Identify persons likely to be affected by or have an interest in the matter, and how you have given consideration to their views or preferences (for example – youth, the aged and those with disabilities).	This does not impact any identified persons under legislation.

State the financial implications and where budgetary provisions have been made to support this decision.	No financial implications.
Chief Financial Officer review.	The Chief Financial Officer has not reviewed this report.

7 NGĀ PŪRONGO / REPORTS

7.8 RESPONSE TO NOTICE OF MOTION FOR THE SEALING OF MARAE & KŌHANGA REO ROADS

File Number: **A5483419**

Author: **Margriet Veenstra, Transportation Business Manager**

Authoriser: **Charlie Billington, Group Manager - Corporate Services**

TAKE PŪRONGO / PURPOSE OF THE REPORT

To provide a response to the Notice of Motion (NoM) dated 28 August 2025 regarding sealing of unsealed road sections near selected Kōhanga reo and Marae, outlining our planned approach, key considerations, and next steps.

WHAKARĀPOPOTO MATUA / EXECUTIVE SUMMARY

- Responds to the Notice of Motion (NoM) dated 28 August 2025, requesting sealing of unsealed road sections near selected Kōhanga Reo and Marae.
- Proposes a strategic, district-wide approach using the Waka Kotahi NZTA Dust Matrix for fair, data-driven prioritisation and funding eligibility.
- Integrates sealing and dust mitigation projects into existing work programmes and planning documents (Long Term Plan, Annual Plan, District Plan).
- Combines routine maintenance, seasonal dust suppression, targeted seal extensions, and alternative surfacing for both immediate and long-term solutions.
- Manages costs by leveraging NZTA subsidies for high-risk sites and applying Council's Dust Control Policy for others.
- Provides a clear timeline for policy development, implementation, and review, with ongoing reporting to Council

TŪTOHUNGA / RECOMMENDATION

That Council:

a) Endorse the strategic approach of the Unsealed Roads Strategy for unsealed roads

i. Agree to include the identified Marae and Kōhanga Reo sites in the prioritised programme for road sealing and dust mitigation

ii. Direct the Chief Executive to continue working closely with Waka Kotahi NZTA to secure funding for dust mitigation at high-risk sites, including those affecting Marae and Kōhanga Reo, and to report back on the outcome of these funding discussions.

iii. Direct the Chief Executive to finalise the Unsealed Roads Strategy and present the updated dust risk findings and Draft Dust Control Policy for Council approval by mid-2026.

iv. Direct the Chief Executive to incorporate budgetary requirements into the next Annual Plan and LTP.

1) TĀHUHU KŌRERO / BACKGROUND

Council has received a Notice of Motion from Councillor Hilda Halkyard-Harawira (28 Aug 2025) advocating for improved dust control and sealing of roads fronting certain Kōhanga Reo and Marae. The motion requests that Council::

a. Seal up to 500m of road (250m each side) at 8 specified Kōhanga Reo/Marae sites within the 2025–28 term.
b. Include 37 marae (listed) in the road prioritisation matrix for seal extensions, with appropriate weighting for their proximity and heavy usage during tangihanga (funerals) and hui.
c. Incorporate the design & delivery of sealed access to these marae into existing work programmes
d. Reflect the above in key planning documents – specifically the 2024–27 Long Term Plan (LTP) with budget allocation, Annual Plan for short-term actions, and the District Plan for long-term land use planning support.

2) MATAPAKI ME NGĀ KŌWHIRINGA / DISCUSSION AND OPTIONS

This report provides a detailed analysis of the Notice of Motion's requests and Council's proposed response. For further context, the discussion covers:

- Background and Context: Outlines the rationale for improved dust control and sealing at Marae and Kōhanga Reo sites.
- Data-Driven Prioritisation: Explains the adoption of the Waka Kotahi NZTA Dust Matrix for fair and effective site selection.
- Risk Categories and GIS Analysis: Details how sites are assessed and ranked for dust risk, with supporting data layers.
- Integration into Planning: Describes how the strategy aligns with Council's planning documents and long-term objectives.
- Programme Options: Summarises the mix of maintenance, dust suppression, seal extensions, and alternative surfacing methods available.
- Cost Implications: Reviews funding options, cost management strategies, and the importance of avoiding isolated "orphan" sealed sites.
- Next Steps: Provides a timeline for policy development, implementation, and review.

For full details and supporting analysis, please refer to the attached briefing paper and supporting documentation.

TAKE TŪTOHUNGA / REASON FOR THE RECOMMENDATION

By endorsing the strategic approach of the Unsealed Roads Strategy for unsealed roads (incorporating the Waka Kotahi NZTA dust matrix and Dust Control Policy), Council would be addressing the Notice of Motion (NOM) by:

- Agreeing to include the identified Marae and Kōhanga Reo sites in the prioritised programme, rather than approving an isolated sealing project for 8 sites out of context. The eight named locations will be treated as high-priority candidates and if the updated analysis confirms their need, staff will proceed with designing sealing or dust control solutions for them as part of the programme *(with a target to implement within the 2025–28 term, resources permitting)*. For any sites that do not rank highly, Council can decide *(via the Dust Policy)* if it still wishes to fund their sealing for community reasons.
- Directing the Chief Executive to continue working closely with Waka Kotahi NZTA to secure funding for dust mitigation at High-risk sites, including those affecting marae, and to report back on the outcome of these funding discussions.
- Directing the Chief Executive to finalise the Unsealed Roads Strategy and present the updated dust risk findings and Draft Dust Control Policy for Council approval by mid-2026. In the meantime, operational efforts through dust suppression and maintenance upgrades will continue at affected sites to mitigate dust this summer and beyond. Progress on implementation will be reported periodically through Council workshops or committee updates, keeping Councillors informed as we move from planning to tangible results on the ground.
- Incorporating the outcomes into the next Annual Plan and LTP as required. For example, if Waka Kotahi NZTA funding is confirmed for some marae road seals, Council's co-funding share would

need to be budgeted. Conversely, if certain projects remain unsubsidised but Council deems them critical per the new policy, we will allocate local funding accordingly.

By following this approach, Council demonstrates a commitment to improving rural Māori community infrastructure in a prudent yet proactive way. It addresses the NoM's core intent, enhancing access and reducing dust at culturally and socially important sites, while also establishing a robust framework to manage all unsealed roads fairly across the district. This ensures that our response is not only effective for the Marae and Kōhanga Reo highlighted, but also for any other community that faces similar challenges now or in the future.

3) PĀNGA PŪTEA ME NGĀ WĀHANGA TAHUA / FINANCIAL IMPLICATIONS AND BUDGETARY PROVISION

The financial impact of sealing and dust suppression at Marae and Kōhanga Reo sites is outlined in the attached briefing paper, including estimated costs for both Council-funded and Waka Kotahi NZTA-subsidised projects.

The financial implications of this proposal, including costs for sealing and dust suppression at Marae and Kōhanga Reo sites, will be determined by the outcome of this report and the subsequent completion of the Unsealed Roads Strategy. While indicative costs and funding options have been outlined in the attached briefing paper, final budgetary provisions will be made once Council confirms priorities and the strategy is adopted.

ĀPITIHANGA / ATTACHMENTS

1. **Notice of Motion - Sealing of Marae and Kōhanga Reo - A5312369** ⇩
2. **Notice of Motion Response - Briefing Paper - A5495301** ⇩

Hōtaka Take Ōkawa / Compliance Schedule:

Full consideration has been given to the provisions of the Local Government Act 2002 S77 in relation to decision making, in particular:

1. A Local authority must, in the course of the decision-making process,
   a) Seek to identify all reasonably practicable options for the achievement of the objective of a decision; and
   b) Assess the options in terms of their advantages and disadvantages; and
   c) If any of the options identified under paragraph (a) involves a significant decision in relation to land or a body of water, take into account the relationship of Māori and their culture and traditions with their ancestral land, water sites, waahi tapu, valued flora and fauna and other taonga.
2. This section is subject to Section 79 - Compliance with procedures in relation to decisions.

He Take Ōkawa / Compliance Requirement	**Aromatawai Kaimahi / Staff Assessment**
State the level of significance (high or low) of the issue or proposal as determined by the Council's Significance and Engagement Policy	This proposal is assessed as having a high level of significance under the Council's Significance and Engagement Policy, given its potential impact on community wellbeing, financial commitments, and strategic infrastructure planning.
State the relevant Council policies (external or internal), legislation, and/or community outcomes (as stated in the LTP) that relate to this decision.	Local Government Act 2002 Activity Management Plan (AMP) Dust Control Policy
State whether this issue or proposal has a District wide relevance and, if not, the ways in which the appropriate Community Board's views have been sought.	Because the strategy and associated decisions affect communities district-wide, consultation and engagement is undertaken at the Council level. If specific Community Board views are required for particular sites or implementation phases, these will be sought as part of the ongoing engagement and reporting process.
State the possible implications for Māori and how Māori have been provided with an opportunity to contribute to decision making if this decision is significant and relates to land and/or any body of water. State the possible implications and how this report aligns with Te Tiriti o Waitangi / The Treaty of Waitangi.	The proposal directly affects Māori communities, particularly those associated with Marae and Kōhanga Reo. At this stage, Council is responding to the Notice of Motion submitted. No formal consultation with iwi or hapū has been undertaken as part of this process, and it is not known whether consultation occurred prior to the NoM submission. Further engagement with affected Māori communities may be considered as the programme progresses
Identify persons likely to be affected by or have an interest in the matter, and how you have given consideration to their views or preferences (for example – youth, the aged and those with disabilities).	Māori communities, especially those associated with Marae and Kōhanga Reo Residents living near unsealed roads, including rural families and property owners Youth and children attending Kōhanga reo, schools, and using school bus routes

	The aged and those with disabilities who may be more vulnerable to health impacts from dust and require reliable road access Community groups and organisations that use marae and other gathering places
State the financial implications and where budgetary provisions have been made to support this decision.	The financial impact of sealing and dust suppression at Marae and Kōhanga Reo sites is outlined in the attached briefing paper, including estimated costs for both Council-funded and Waka Kotahi NZTA-subsidised. Projects. The financial implications of this proposal will be determined by the outcome of this report and the subsequent completion of the Unsealed Roads Strategy. While indicative costs and funding options have been outlined in the attached briefing paper, final budgetary provisions will be made once Council confirms priorities and the strategy is adopted.
Chief Financial Officer review.	This report has been submitted to the CFO for review

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5.1 NOTICE OF MOTION - SEALING OF MARAE AND KŌHANGA REO

File Number: A5312369

I, Hilda Halkyard-Harawira, give notice that at the next Ordinary Meeting of Council to be held on 11 December 2025, I intend to move the following motion:

MŌTINI / MOTION

That Council;

a) approve sealing 250 metres of unsealed road either side (i.e, up to 500m) of 8 Kōhanga Reo education sites/Marae (as per list 1 below), within the 2025/28 term;

b) direct the Chief Executive to ensure staff include the 37 Marae (as per list 2 below) in the prioritisation matrix used for seal extension projects, ensuring their proximity and community significance are appropriately weighted in the algorithm used to rank unsealed roads; taking into account the heavy usage of vehicles during tangihanga and community hui gatherings.

c) request that the resourcing, design, and delivery of sealed access to these Marae be incorporated into all of the Council's work programmes, including the Infrastructure Strategy, Roading Maintenance Plans, and Seal Extension Programme.

d) further resolve that the inclusion of these Marae be reflected in the following planning documents:

i) the Long-Term Plan (LTP) 2024–2027, with appropriate budget allocation and prioritisation,

ii) the Annual Plan, to ensure short-term implementation and accountability,

iii) the District Plan, to support long-term infrastructure and land use planning that enhances Marae accessibility and resilience.

TAKE / RATIONALE

To advocate for the prioritisation and resourcing of road sealing projects in front of Kōhanga Reo and Marae across the Far North District, recognising their educational, cultural, social, and community significance.

The Far North District has a total of 2,508 km of roads, of which only 35% (858 km) are sealed. This means 65% (1,650 km) remain unsealed, disproportionately affecting rural communities, many of which are Māori and located near Kōhanga Reo and Marae.

Far North District Council (FNDC) does not have a standalone policy that mandates sealing roads in front of Kōhanga Reo and Marae. However, several foundational documents and programmes explicitly include Marae and Kōhanga Reo as a prioritisation factor in road sealing decisions.

For example the:

Priority Seal Extensions Programme;

- was launched in 2019 to seal roads that *did not qualify for Waka Kotahi subsidies; and* −
- uses a Dust Prioritisation Matrix that ranks roads based on;
  - Traffic volumes
  - Number of residents
  - Presence of schools, Marae and other community facilities *(e.g. Parapara Toatoa Road was sealed up to and including Parapara Marae).*

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Dust Prioritisation Matrix;

- this matrix measures 22 criteria including proximity to Marae;
- is used to ensure transparent and fair selection of roads for sealing, and notes that roads near Marae are considered *high priority* due to community impact.

Longterm Plan (LTP) commitments;

- FNDC has committed $11 million over the last 10 years to seal critical risk roads that were selected based on community concerns, including dust near Marae.

Unsealed roads pose serious health and safety risks:

- **Dust Pollution:** Dust from gravel roads contaminates roof-collected water supplies, infiltrates homes, and settles on clothing and food. This is especially harmful to young children and kaumātua, who are more vulnerable to respiratory issues.
- **Road Hazards:** Unsealed roads are prone to potholes, corrugation, and instability when wet, increasing the risk of vehicle accidents, especially for school transport and kaumātua mobility.
- **Emergency Access:** During severe weather events, unsealed roads are often impassable, delaying emergency services and isolating communities

Cultural and Educational Significance

Marae and Kōhanga Reo are cultural anchors and civil defence sites for Māori and rural communities:

- Marae serve as places of gathering, ceremony, and refuge. Their accessibility is vital for tangihanga, hui, and whānau support.
- Kōhanga Reo are foundational to the revitalisation of te reo Māori, and their connection to Marae reinforces intergenerational learning and tikanga.
- Sealing roads to these sites affirms the mana and dignity of Māori institutions and supports Te Tiriti-based infrastructure planning.

Educational Equity - Kōhanga Reo are 40 years old

Unsealed roads hinder access to early childhood education:

- **Transport Barriers:** Whānau may avoid sending tamariki to Kōhanga Reo due to unsafe or unreliable road conditions, especially in winter.
- **Attendance and Retention:** Poor access contributes to lower attendance rates, undermining the goals of Māori-medium education and language revitalisation.
- **Equity and Inclusion:** Sealing roads to Kōhanga Reo ensures equal access to education, aligning with national outcomes for Māori success as Māori.

Strategic and Economic Rationale

While sealing all unsealed roads would cost an estimated $500 million, FNDC has acknowledged that targeted sealing is feasible and necessary. It

Prioritising roads to Marae and Kōhanga Reo:

- Aligns with existing council commitments to seal roads where the need is greatest.
- Supports community wellbeing and reduces long-term health costs.
- Demonstrates partnership with Māori, fulfilling obligations under Te Tiriti o Waitangi.

Conclusion

Sealing roads to Marae and Kōhanga Reo is not just a matter of infrastructure, it is a matter of justice, equity, and cultural respect. It enhances health, safety, education, and cultural

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resilience for Māori communities and reflects a commitment to inclusive and future-focused planning.

I have highlighted these roads in each of my Elected Member reports since the **11th December 2023** and staff have not considered or advanced this matter since then:

- Council Agenda 11 December 2023 - page 133
- Council Agenda 14 March 2024 - page 223
- Council Agenda 11 April 2024 – page 22 (supplementary agenda)
- Council Agenda 9 May 2024 – page 104
- Council Agenda 13 June 2024 – page180
- Council Agenda 11 July 2024 – pages 146 & 147
- Council Agenda 8 August 2024 – page 234
- Council Agenda 12 September 2024 – page 479
- Council Agenda 17 October 2024 – page 501
- Council Agenda 14 November 2024 – page 185
- Council Agenda 12 December 2024 – page 488
- Council Agenda 13 February 2025 – page 258
- Council Agenda 13 March 2025 – page 154
- Council Agenda 10 April 2025 – page 242
- Council Agenda 8 May 2025 – page183
- Council Agenda 5 June 2025 – pages 187 & 188
- Council Agenda 3 July 2025 – pages 383 & 384
- Council Agenda 31 July 2025 – pages 565 & 567

Furthermore there have been numerous reports to Council on FNDC Seal Extension Prioritisation. Some examples are:

LIST 1 - 8 KŌHANGA REO/ MARAE COMBINATION ROADS IN THE FAR NORTH

1	Whangapē Kōhanga Reo , Kotahitanga Marae	Herekino Rd, Whangapē
2	Pā Arapeta , Ngāti Manawa Marae, Panguru	340 West Coast Road
3	Whakamaharatanga Kōhanga Reo, Whakamaharatanga Marae, Waimamaku	14 Waimamaku Beach Rd, Waiotemarama
4	Taurangi Kōhanga Reo, Waimate North	140 Whakataha Road
5	Maungataniwha Kōhanga Reo, Ngāpuhi Marae	9 Iwitaua Rd, Mangamuka
6	Mōtatau Kōhanga Reo,	103 Henare Rd, Mōtatau
7	Matawaia Kōhanga Reo, Matawaia Marae Kawakawa	Pokapū Rd, RD1, Kawakawa.
8	Wharepunga Kōhanga Reo, Pukerata Marae ,	613 Wharepunga Rd, Otaua

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LIST 2 - MARAE LOCATED ON UNSEALED ROADS IN FNDC AREA.

1	Haititaimarangai Marae – Karikari	176 Whatuwhiwhi Road,
2	Wainui Marae – Ahipara	17 Wainui Road , 0481
3	Rangikohu Marae – Herekino Kaitaia	7 Settlement Way, 0481
4	King Hori Marae Owhata	Owhata, Herekino
5	Morehu Marae – Pawarenga	10 –12 Te Riha Roadway0496
6	Waiparera Marae – Kohukohu	384 Rangi Point Road 0492
7	Motuti (Tamatea) Marae – Kohukohu	325 Motuti Rd RD2 0492
8	Matihetihe (Mitimiti) Marae	3733 Hohaia Road Mitimiti.
9	Te Arohanui Marae – Mangataipa	203 Mangataipa Road, Mangamuka Bridge 0476
10	Ngāi Tupoto Marae – Motukaraka	201 Motukaraka Point, 0491
11	Pateoro (Te Karae) Marae – Kohukohu	414 Kohukohu Road ,0491
12	Pikipāria Marae – Kohukohu	53 Smith Deviation Road,0491
13	Piki Te Aroha Marae – Rāhiri	46 Harris Road Rāhiri 0475
14	Motukiore Marae – Hōreke	651 Motukiore Road, 0475
15	Puketawa Marae – Utakura	1400 Hōreke Road , 0475
16	Rangatahi Marae – Hōreke	1560 Hōreke Road Maraeroa , 0475
17	Otātara Marae – Waimā	36 Otātara Marae Rd, 0473
18	Moehau – Waimā	2 Mission Oak Road 0473
19	Mahuri Marae – Taheke, Kaikohe	154 Ramsay Road,
20	Kaingahoa (Mataraua) Marae – Kaikohe	945 Mataraua Road 0474
21	Ngai Tawake Marae – Mataraua	1235 Mataraua Road, 0474
22	Te Huehue Marae – Ōtaua	31 Stewart Road,
23	Mokonuiārangi Marae – Maraeroa	1627 Hōreke Road , 0475

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24	Ōkorihi Marae –Te Iringa	34 Te Iringa West Road, 0473
25	Te Patunga Marae – Kāeo	585c Pupuke Mangapa Road 0479
26	Tahaawai Marae –Pupuke	231 Weber Road Pupuke 0479
27	Pupuke (Te Huia) Marae – Otangaroa	11 Te Huia Marae Road, Pupuke , 0479
28	Waimahana Marae –Turn left at 227 Taupo Bay Road, drive for 8km (keep left) to Waimahana Bay. Drive along beachfront track to Marae (300 m up creek)	Waimahana Bay- Ngāti Kahu
29	Akerama Marae – Towai	19 Haile Rd,Hukerenui,0182
30	Mohinui Marae – Kawakawa 0281	234 Waiomio Road , 0281
31	Kaikou Marae – Matawaia	3923 Pipiwai Road 0281
32	Kaimaumau Marae , Waiharara	Kaimaumau, 0627
33	Taemaro,	HIhI, 0295
34	Matai Aronui, Whirinaki	Wikaira Rd, Whirinaki 0473
35	Te Piiti Marae, Omanaia	28 Omanaia Road, 0473
36	Tākou Marae	Tākou, 0295
37	Other Marae to be added if omitted from this list	

I commend this Notice of Motion to Council.

Mover: Kaikaunihera Hilda Halkyard-Harawira. **Seconded:** Kaikaunihera Babe Kapa & Tāmati Rākena.

ĀPITIHANGA / ATTACHMENTS

1. **Attachment 1 - 8 Kōhanga/Marae Combined Roads in FNDC Area - A5348009**
2. **Attachment 2 - Marae located on Unsealed Roads in FNDC Area - A5348010**

NOTICE OF MOTION TO THE COUNCIL MEETING 28 AUGUST 2025

To, Kahika Moko Tepania,

I, Hilda Halkyard-Harawira, give notice that at the next Ordinary Meeting of Council to be held on 28 August 2025 or within this current triennium , I intend to move the following motion:

MŌTINI / MOTION
That Council;

a) approve sealing 250 metres of unsealed road either side ie up to (500m total) of 8 Kōhanga Reo (list 1) education sites/ Marae, as listed below, within the 2025/28 term;

b) direct the Chief Executive to ensure staff include the 37 marae (list 2 below) in the prioritisation matrix used for seal extension projects, ensuring their proximity and community significance are appropriately weighted in the algorithm used to rank unsealed roads; taking into account the heavy usage of vehicles during tangihanga and community hui gatherings.

c) request that the resourcing, design, and delivery of sealed access to these marae be incorporated into the Council's work programmes, including the Infrastructure Strategy, Roading Maintenance Plans, and Seal Extension Programme.

d) further resolve that the inclusion of these Marae be reflected in the following planning documents:

1. **The Long-Term Plan (LTP) 2024–2027**, with appropriate budget allocation and prioritisation 3,
2. **The Annual Plan**, to ensure short-term implementation and accountability,
3. **The District Plan**, to support long-term infrastructure and land use planning that enhances marae accessibility and resilience.

Take / Rationale
To advocate for the prioritisation and resourcing of road sealing projects in front of Kōhanga Reo and Marae across the Far North District, recognising their educational, cultural, social, and community significance.

The Far North District has a total of 2,508 km of roads, of which only 35% (858 km) are sealed. This means 65% (1,650 km) remain unsealed, disproportionately affecting rural communities, many of which are Māori and located near Kōhanga Reo and Marae.

Far North District Council (FNDC) does not have a standalone policy that mandates sealing roads in front of Kōhanga Reo and Marae. However, several foundational documents and programmes explicitly include marae and Kōhanga Reo as a prioritisation factor in road sealing decisions. For example the:

- **Priority Seal Extensions Programme;**
  - was launched in 2019 to seal roads that *did not qualify for Waka Kotahi subsidies;*

and − uses a Dust Prioritisation Matrix that ranks roads based on;
- Traffic volumes
- Number of residents
- Presence of schools, marae and other community facilities *(e.g. Parapara Toatoa Road was sealed up to and including Parapara marae).*

• Dust Prioritisation Matrix;
− this matrix measures 22 criteria including proximity to marae;
− is used to ensure transparent and fair selection of roads for sealing, and notes that roads near marae are considered *high priority* due to community impact.

• Longterm Plan (LTP) commitments;
− FNDC has committed $11 million over the last 10 years to seal critical risk roads that were selected based on community concerns, including dust near marae.

Unsealed roads pose serious health and safety risks:
- **Dust Pollution:** Dust from gravel roads contaminates roof-collected water supplies, infiltrates homes, and settles on clothing and food. This is especially harmful to young children and kaumātua, who are more vulnerable to respiratory issues.
- **Road Hazards:** Unsealed roads are prone to potholes, corrugation, and instability when wet, increasing the risk of vehicle accidents, especially for school transport and kaumātua mobility.
- **Emergency Access:** During severe weather events, unsealed roads are often impassable, delaying emergency services and isolating communities

Cultural and Educational Significance
Marae and Kōhanga Reo are cultural anchors and civil defence sites for Māori and rural communities:
- Marae serve as places of gathering, ceremony, and refuge. Their accessibility is vital for tangihanga, hui, and whānau support.
- Kōhanga Reo are foundational to the revitalisation of te reo Māori, and their connection to marae reinforces intergenerational learning and tikanga.
- Sealing roads to these sites affirms the mana and dignity of Māori institutions and supports Te Tiriti-based infrastructure planning.

Educational Equity - Kohanga Reo are 40 years old
Unsealed roads hinder access to early childhood education:
- **Transport Barriers:** Whānau may avoid sending tamariki to Kōhanga Reo due to unsafe or unreliable road conditions, especially in winter.
- **Attendance and Retention:** Poor access contributes to lower attendance rates, undermining the goals of Māori-medium education and language revitalisation.
- **Equity and Inclusion:** Sealing roads to Kōhanga Reo ensures equal access to education, aligning with national outcomes for Māori success as Māori.

Strategic and Economic Rationale
While sealing all unsealed roads would cost an estimated $500 million, FNDC has acknowledged that targeted sealing is feasible and necessary.
Prioritising roads to marae and Kōhanga Reo:

• Aligns with existing council commitments to seal roads where the need is greatest.
• Supports community wellbeing and reduces long-term health costs.
• Demonstrates partnership with Māori, fulfilling obligations under Te Tiriti o Waitangi.

Conclusion

Sealing roads to marae and Kōhanga Reo is not just a matter of infrastructure, it is a matter of justice, equity, and cultural respect. It enhances health, safety, education, and cultural resilience for Māori communities and reflects a commitment to inclusive and future-focused planning.

I commend this Notice of Motion to Council.

Mover: Kaikaunihera Hilda Halkyard-Harawira.
Seconded: Kaikaunihera Babe Kapa.

List 1 8 Kohanga Reo/ Marae Combination Roads in the Far North

1	Whangapē Kohanga Reo , Kotahitanga Marae	Herekino Rd, Whangapē
2	Pā Arapeta , Ngāti Manawa Marae, Panguru	340 West Coast Road
3	Whakamaharatanga Kohanga Reo, Whakamaharatanga Marae , Waimamaku	14 Waimamaku Beach Rd, Waiotemarama
4	Taurangi Kōhanga Reo, Waimate North	140 Whakataha Road
5	Maungataniwhā Kohanga Reo,Ngāpuhi Marae	9 Iwitaua Rd, Mangamuka
6	Motatau Kohanga Reo,	103 Henare Rd,Motatau
7	Matawaia Kohanga Reo, Matawaia Marae Kawakawa	Pokapu Rd, RD1, Kawakawa.
8	Wharepunga Kohanga Reo, Pukerata Marae ,	613 Wharepunga Rd, Otaua

List 2 MARAE LOCATED ON UNSEALED ROADS in FNDC area.

1	Haititaimarangai Marae –Karikari	176 Whatuwhiwhi Road,
2	Wainui Marae – Ahipara	17 Wainui Road , 0481
3	Rangikohu Marae – Herekino Kaitaia	7 Settlement Way, 0481
4	King Hori Marae Owhata	Owhata, Herekino
5	Morehu Marae – Pawarenga	10 –12 Te Riha Roadway0496
6	Waiparera Marae –Kohukohu	384 Rangi Point Road 0492
7	Motuti (Tamatea) Marae – Kohukohu	325 Motuti Rd RD2 0492

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8	Matihetihe (Mitimiti) Marae –	3733 Hohaia Road Mitimiti.
9	Te Arohanui Marae – Mangataipa	203 Mangataipa Road, Mangamuka Bridge 0476
10	Ngāi Tupoto Marae – Motukaraka	201 Motukaraka Point, 0491
11	Pateoro (Te Karae) Marae – Kohukohu	414 Kohukohu Road ,0491
12	Pikipāria Marae – Kohukohu	53 Smith Deviation Road,0491
13	Piki Te Aroha Marae – Rāhiri	46 Harris Road Rāhiri 0475
14	Motukiore Marae – Hōreke	651 Motukiore Road, 0475
15	Puketawa Marae – Utakura	1400 Hōreke Road , 0475
16	Rangatahi Marae – Hōreke	1560 Hōreke Road Maraeroa , 0475
17	Otātara Marae – Waimā	36 Otātara Marae Rd, 0473
18	Moehau – Waimā	2 Mission Oak Road 0473
19	Mahuri Marae – Taheke, Kaikohe	154 Ramsay Road,
20	Kaingahoa (Mataraua) Marae – Kaikohe	945 Mataraua Road 0474
21	Ngai Tawake Marae – Mataraua	1235 Mataraua Road, 0474
22	Te Huehue Marae – Ōtaua	31 Stewart Road,
23	Mokonuiārangi Marae – Maraeroa	1627 Hōreke Road , 0475
24	Ōkorihi Marae –Te Iringa	34 Te Iringa West Road, 0473
25	Te Patunga Marae – Kāeo	585c Pupuke Mangapa Road 0479
26	Tahaawai Marae –Pupuke	231 Weber Road Pupuke 0479
27	Pupuke (Te Huia) Marae – Otangaroa	11 Te Huia Marae Road, Pupuke , 0479
28	Waimahana Marae –Turn left at 227 Taupo Bay Road, drive for 8km (keep left) to Waimahana Bay. Drive along beachfront track to marae (300 m up creek)	Waimahana Bay- Ngāti Kahu
29	Akerama Marae – Towai	19 Haile Rd,Hukerenui,0182
30	Mohinui Marae – Kawakawa 0281	234 Waiomio Road , 0281

4

31	Kaikou Marae – Matawaia	3923 Pipiwai Road 0281
32	Kaimaumau Marae , Waiharara	Kaimaumau, 0627
33	Taemaro,	Hlhl, 0295
34	Matai Aronui, Whirinaki	Wikaira Rd, Whirinaki 0473
35	Te Piiti Marae, Omanaia	28 Omanaia Road, 0473
36	Tākou Marae	Tākou, 0295
37	Other marae to be added if omitted from this list	

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Briefing Paper: Response to Notice of Motion (NoM) dated 28 August 2025

Reporting Officer: Margriet Veenstra
Date: 28 November 2025

Ngā whāinga | Purpose

To provide a response to the Notice of Motion (NoM) dated 28 August 2025 regarding sealing of unsealed road sections near selected Kōhanga reo and marae, outlining our planned approach, key considerations, and next steps.

Horopaki | Context

Background

Council has received a Notice of Motion from Councillor Hilda Halkyard-Harawira (28 Aug 2025) advocating for improved dust control and sealing of roads fronting certain Kōhanga reo and marae. The motion requests that Council:

(a) Seal up to 500m of road (250m each side) at 8 specified Kōhanga Reo/Marae sites within the 2025–28 term.

(b) Include 37 marae (listed) in the road prioritisation matrix for seal extensions, with appropriate weighting for their proximity and heavy usage during tangihanga (funerals) and hui.

(c) Incorporate the design & delivery of sealed access to these marae into existing work programmes

(d) Reflect the above in key planning documents – specifically the 2024–27 Long Term Plan (LTP) with budget allocation, Annual Plan for short-term actions, and the District Plan for long-term land use planning support.

Context

The Far North District has approximately 1,650 km (65%) of unsealed roads, many serving rural communities, including marae and Kōhanga reo. Unsealed roads pose well-documented issues: dust pollution affecting health and water supplies, safety hazards (corrugations, potholes), and unreliable access during bad weather. Council recognises these concerns. Rather than addressing a handful of sites in isolation, we propose a district-wide, evidence-based strategy that will prioritise marae and Kōhanga reo while ensuring sustainable outcomes.

Ngā kōrerorero | Discussion

Data-Driven Prioritisation

To ensure fairness, reduce cost to Council, and support the development of a robust Unsealed Roads Strategy, FNDC has now adopted the official Waka Kotahi NZTA Dust Matrix rather than relying on its previous internal version. The earlier FNDC-specific matrix did not follow NZTA guidelines and therefore did not qualify for funding. The updated matrix uses a broader set of variables and aligns with Waka Kotahi NZTA's funding criteria, enabling us to identify high, medium, and low dust-risk roads more accurately.

This matrix evaluates 12 variables such as traffic volumes, number of buildings, sensitive locations (dwelling, community facilities, ecological areas and horticultural land) within 80 metres of unsealed roads and accounting for environmental and operational factors including roadway location, rainfall frequency, and forestry-related road use.

While the previous matrix had not been updated since 2022, this work has now been completed. We have shared the draft data with Waka Kotahi NZTA, who have confirmed they are satisfied with our approach. As part of this process, we requested that seasonal factors be considered, specifically, lower rainfall and higher tourist traffic during summer months, which may result in some medium-risk sites being reclassified as high-risk.

GIS layers have been created for each variable and analysis undertaken for each unsealed section. The updated matrix and supporting data are available and can be included as an attachment to this briefing.

"High/Medium/Low" Dust Risk Categories

The Waka Kotahi NZTA matrix categorises each road segment by dust risk:

- High Risk (>20 points) – Waka Kotahi NZTA considers roads in the "High" band as those that would "likely benefit from dust mitigation" and will "probably" fund dust control or sealing at these sites. These become top priorities for action.
- Medium Risk (10-19 points) –Waka Kotahi NZTA deems these sites medium risk and "may benefit" from mitigation; further investigation is recommended, and Waka Kotahi NZTA may co-fund solutions on a case-by-case basis.
- Low Risk – (< 10 points) Waka Kotahi NZTA deems these sites low risk. These are less likely to receive external funding and will be managed with routine maintenance unless future changes elevate their priority.

GIS layers have been created for all the NZTA matrix variables and subsets, providing real-time road use including:

- Traffic – light and Heavy
- Vehicle Speed
- Rainfall
- Logging locations and timing
- Gathering places – Marae, Church, school (including school bus routes)
- Horticulture
- Agriculture (including milk tanker routes)
- Ecology – wetlands, rivers

This data will be used to develop a 10-year unsealed road strategy, including prioritising/determining Level of Service (LOS) - staged construction, traction seals, seal extension - based on current and future road use for all unsealed roads.

Integration into Planning

The Unsealed Roads Strategy will be formally embedded in our Activity Management Plan (AMP). Council is required to update its transport AMP by July 2026, and this update will include the new 10-year Unsealed Roads Strategy. Thus, by mid-2026, we will have:

- A prioritised list of unsealed road sections (with dust risk rankings) to guide where upgrades or seal extensions occur first.
- A supporting Dust Control Policy adopted by Council, defining what dust mitigation measures the Council will fund and under what conditions. (This policy will clarify Council's approach for sites that do not qualify for Waka Kotahi NZTA subsidies)
- Alignment with strategic documents: The 2024–27 LTP already signalled funding for some seal extensions and dust solutions; any adjustments or specific provisions for marae road sealing can be made via the Annual Plan or the next LTP, guided by the strategy. The Infrastructure Strategy and District Plan will likewise reflect this systematic approach for improving marae accessibility (fulfilling NoM points c and d).

In summary, the Unsealed Strategy approach means rather than committing to seal a fixed list of sites immediately, we are ensuring all high-need sites (including the Kōhanga reo and marae in the NoM) are identified, ranked, and addressed in order of urgency and impact. This maximises fairness and lets us leverage external funding opportunities for the highest-risk roads.

Programme of Upgrades, Dust Control, and Seal Extensions

Using the above strategy, we will develop and implement a multi-faceted programme for unsealed roads that addresses both short-term dust issues and long-term fixes (including sealing). The programme will consist of several components:

- Routine & Preventative Maintenance: First and foremost, we will continue drainage improvements, shape correction, routine grading and pavement and running course renewal on unsealed roads, with a focus on resilience, Level of Service and dust reduction. We are investigating sourcing and blending more dujs-resistant aggregate (including re-opening non-operational quarries) to use surfacing materials that generate less dust. These upgrades, though not immediately visible like sealing, will improve conditions for many roads in the network.
- Seasonal Dust Suppression: For the most dust-affected sites (e.g. homes or a marae very close to a busy gravel road), seasonal dust suppression will be applied as an interim relief measure. Dust oiling/suppressant can significantly reduce dust for a few months. This summer (2025/26), FNDC's dust suppression programme will treat the same roads as last year. Going forward, the Dust Control Policy and updated matrix will guide which sites will qualify for dust suppression each summer.

- Selective Seal Extensions: Permanent sealing will be targeted to the highest-priority locations where it is cost-effective and beneficial. This includes short sections in front of key community sites (like those identified in the NoM) provided they rank highly on the dust risk matrix or are otherwise justified by policy. Sealing is the only long-term solution to eliminate dust, but it comes at a high cost. To ensure value:
    - We will prioritise sites that qualify for Waka Kotahi NZTA funding under safety or public health criteria (i.e. "High" dust risk). These projects can receive a Waka Kotahi NZTA subsidy, covering 71% of the cost (FNDC's normal Funding Assistance Rate), meaning Council pays 29%. We will clarify with Waka Kotahi NZTA which funding avenues (maintenance, Low Cost Low Risk improvements, special dust mitigation funds etc.) can be tapped. Our goal is that the majority of the programme's funding comes from Waka Kotahi NZTA, not local rates, wherever eligibility can be obtained.
    - For sites that do not qualify for subsidy ("Medium" or "Low" category), Council will evaluate them under the new Dust Control Policy. This policy will establish criteria for when Council will invest its own funds to seal or treat a road. For instance, if a marae road is medium priority but has critical safety issues or high community value, Council could choose to proceed with local funding. The policy will balance community benefits against the considerable costs of purely locally funded sealing. Note: Sealed roads are roughly 5 times more expensive to maintain than unsealed roads on a per-kilometre basis over their life, and very short isolated sealed sections can be particularly costly to maintain (e.g. edge break repairs, turning areas). We must therefore be prudent in adding new short, sealed sections unless they solve a significant problem. Short sections will ideally be done where they can be integrated into future longer seal extensions to improve cost-efficiency long-term.
    - Alternative surfacing (Otta seal): Where full standard sealing is cost-prohibitive or over-engineered for the situation, we will consider Otta seals or similar low-cost treatments. For example, some marae access roads with low heavy-vehicle traffic might be good candidates for Otta seal as a dust-control measure. At approximately $20–30 per square metre, Otta seal is much cheaper than traditional chip seals, which are approximately $100/m². It has a shorter lifespan (5–7 years) but can be a pragmatic intermediate solution. We have successfully piloted Otta seals at four sites last year, which are performing well so far. If suitable, this approach could be used to quickly seal the immediate frontage of some Kōhanga reo or marae, until a permanent solution is funded. These road sections need to be flat, free draining and no heavy vehicles/traffic.
    - Staged approach: Another cost-saving method is to stage the construction for longer sections of road (>1km). For instance, use subsidised maintenance funds in Year 1 to improve the road's base (e.g. strengthen pavement, improve drainage), then in Year 2 or 3 use Council capital to apply a sealing surface. By doing this, the preparatory work can often be covered under Waka Kotahi NZTA's maintenance/renewal budget, effectively reducing the net cost to Council for the overall upgrade. We will evaluate this staged approach for all road segments in the unsealed strategy as it could allow us to start making improvements immediately, under maintenance, and complete the sealing later, ideally aligning with any available subsidy.

Cost Implications

The above programme is designed to spread costs over time and sources. To illustrate, the NoM's request (8 500m seal extensions + dust suppression at 37 others) if done entirely by Council alone would cost approximately $3.56M, as per the below:

- Sealing - $3.12M ($100/m2, 3564plus a second coat seal one year after initial sealing)
- Dust control - $444K ($4/m2, $12,000 per site)

The estimated cost to rate payers would be $2.43 (incl. GST) for every $100k land value for residential and lifestyle properties, and $6.68 (incl. GST) per $100k land value for commercial/industrial properties.

By comparison, under the strategic approach:

- We first determine which of those sites (and others district-wide) rank as High risk. Those that are High will be packaged into a Waka Kotahi NZTA-subsidised programme, as safety improvements due to dust. At an indicative 71% FAR subsidy, sealing 8 sites could then cost the Council only approximately $0.8M, with Waka Kotahi NZTA covering $2M. Medium-risk sites may also attract partial subsidy if we present a strong case.
- The ongoing dust suppression costs should drop as we implement permanent solutions on the high-risk v dust sites. In the interim, we will target Waka Kotahi NZTA's maintenance budget for any dust mitigation that can be justified as operational or seek special funding. We note that Waka Kotahi NZTA has recently signalled willingness to address dust on rural roads, and our collaboration on the

dust matrix update is a step toward securing that support. If some marae roads still require annual treatment, we will include those costs in the upcoming Annual Plans, but the aim is to reduce reliance on temporary measures by pursuing permanent fixes via the strategy.

- The programme will also explore external co-funding or partnerships where available. In some cases, community/forestry partnerships can contribute to local road improvements, as seen historically with forestry companies helping fund dust suppression on rural roads. We have currently not identified extra government funding, but FNDC will pursue a special case with central government based on health issues and dust, for non-subsidised sites if appropriate.

By adopting a strategic approach for any short sections selected for sealing, ensures these are considered within the context of the wider roading network. This prevents the creation of isolated "orphan" sealed patches, which are costly to maintain and can reduce eligibility for NZTA subsidies for future sealing or dust suppression, due to fragmentation of the unsealed network. Instead, our planning aligns smaller sections with main qualifying unsealed roads, allowing for coordinated upgrades that maximise long-term efficiency and minimise additional costs.

E whai ake nei | Next Steps

We acknowledge the NoM's desire to see action within the 2025–28 Council term. The following timeline outlines how and when key steps will occur to implement the strategy and address the NoM's objectives:

Date/Period	Milestone
Aug 2025	Notice of Motion Received
Feb 2026	Dust Matrix Update
Mar 2026	Draft Policy & Strategy Development
June 2026	Adoption of Dust Control Policy & AMP Update
2026–2027	Implementation (Phase 1)
Mid 2027	Funding Applications (2027–30 NLTP)
2027–2028	Implementation (Phase 2)
By 2028	Review and Council Term Goals

Conclusion

The approach outlined above allows Council to address dust issues across the district and at marae and Kōhanga reo in a strategic, sustainable manner. By integrating the Notice of Motion's goals into the wider Unsealed Roads Strategy, we ensure that:

- Immediate relief can be provided, through dust suppressants, while long-term solutions like permanent sealing or road upgrades are planned and funded.
- Council maximises the use of external funding through Waka Kotahi NZTA subsidies to cover the majority of costs wherever possible, rather than relying solely on ratepayer funds. This not only makes the programme more affordable but also aligns our projects with national funding criteria (safety, public health, resilience).
- The commitments are institutionalised in policy and planning documents, giving them continuity and accountability. The work will be tracked through the AMP and budgets, ensuring follow-through even beyond the current triennium.

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FAR NORTH DISTRICT COUNCIL

DUST MATRIX ASSESSMENT REPORT

DOCUMENT NO:

075-TM-RDC-01_RevP1

DUST RISK PRIORITISATION OF UNSEALED ROADS WITHIN THE FAR NORTH DISTRICT

REV	DATE	DESCRIPTION	ORIG	CHK'D	APP'D	CLIENT
P1	24.10.2025	DUST MATRIX REPORT	AS/AP	BH	BH	FNDC

EXECUTIVE SUMMARY

The Dust Matrix Project was developed to identify, assess, and prioritise unsealed roads within the Far North District based on their potential to generate and expose communities to road dust. The project integrates multiple spatial datasets within QGIS to create an evidence-based tool that supports data-driven decision-making for dust mitigation and road-sealing programmes.

The Dust Matrix evaluates three core components that influence dust generation and exposure:

- Traffic – capturing vehicle volume and speed data.
- Receptors – identifying sensitive locations such as dwellings, community facilities, ecological areas, and horticultural land within 80 metres of unsealed roads.
- Site Characteristics – accounting for environmental and operational factors including roadway location, rainfall frequency, and forestry-related road use.

Each factor was spatially analysed and scored in accordance with the NZTA Dust Matrix criteria, producing a consistent, district-wide prioritisation framework. The resulting Dust Matrix highlights areas of highest dust risk, enabling FNDC to focus dust-control resources where they will have the greatest benefit to community health, environmental protection, and road network sustainability.

The Dust Matrix represents a significant step toward proactive, data-supported management of unsealed roads in the Far North—balancing technical insight, environmental awareness, and operational practicality in local roading decisions.

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LIST OF FIGURES

1. INTRODUCTION

The purpose of this project is to develop a comprehensive Dust Matrix for the Far North District's unsealed road network. The Dust Matrix provides an evidence-based framework for prioritising dust mitigation works by assessing and scoring each unsealed road segment according to key contributing factors, namely Traffic, Receptors, and Site Characteristics.

This analysis was undertaken using QGIS and integrating multiple spatial datasets. Each road segment was assessed through a scoring system applied within QGIS attribute tables, combining quantitative data (such as traffic volumes and road length) with spatial proximity analyses (e.g. buffers around receptors).

The resulting Dust Matrix provides a consistent, transparent, and repeatable method for evaluating the dust risk level across the district. It enables FNDC and its contractors to prioritise maintenance and sealing programmes based on objective criteria rather than anecdotal evidence.

2. DUST MATRIX COMPONENTS

2.1 TRAFFIC

The Traffic component of the Dust Matrix was developed using four key datasets integrated into QGIS:

1. 5-day AADT (Average Annual Daily Traffic) of Heavy Commercial Vehicles (HCVs)
2. 5-day AADT of Light Duty Vehicles (LDVs)
3. Speed of HCVs
4. Speed of LDVs

2.1.1 AADT OF HCVS AND LDVS

For both HCV and LDV AADT data, information was sourced directly from RAMM. However, not all unsealed roads had actual traffic count data available, so RAMM's latest estimated values were used. Each AADT record is linked to a specific carriageway segment via its unique Carriageway ID, which served as the key reference throughout the Dust Matrix. Using these datasets, final AADT scores were assigned based on defined traffic volume ranges.

Figure 1 presents the AADT for both HCVs and LDVs. Thin, cool-coloured lines represent LDV traffic volumes, whereas thick, warm-coloured lines denote HCV traffic volumes.

Figure 1: AADT LDVs and HCVs (RAMM)

2.1.2 SPEED OF HCVS AND LDVS

Speed data was obtained from NZTA in polygon format and subsequently converted into line features. The dataset provided a single legal speed limit per road segment (not differentiated by vehicle class). To align with the NZTA Dust Matrix methodology, adjustments were made to generate two separate datasets:

- For LDVs, any legal speed limit exceeding 75 km/h was reduced to 75 km/h, while lower limits were retained as provided. It should be noted that some roads remain unclassified, resulting in the system assigning a default legal speed limit of 100 km/h.
- For HCVs, any legal speed limit exceeding 55 km/h was reduced to 55 km/h, while lower limits were retained as provided. This dataset reflects the assumption that all roads may carry heavy commercial vehicles.

These adjusted speed datasets were then linked to the corresponding road segments and scored in accordance with the NZTA Dust Matrix Scoring System. Figure 2 illustrates the colour-coded speed limits for unsealed roads.

Figure 2: Legal Speed Limits (NZTA)

2.2 RECEPTORS (WITHIN 80M OF THE ROADWAY)

The Receptors component of the Dust Matrix identifies locations where people, communities, or the environment are most likely to be affected by dust emissions from unsealed roads. This analysis focuses on the proximity of sensitive receptors, such as dwellings, community facilities, ecological areas, and horticultural land uses, to the road network.

2.2.1 BUILDINGS

Building data was sourced from Land Information New Zealand (LINZ) using the Building Outlines dataset. This dataset provides current outlines of buildings across mainland New Zealand, captured from the most recent aerial imagery. A building outline represents the two-dimensional roof footprint of a structure and is derived through a combination of automated and manual classification processes applied to LINZ aerial imagery.

The dataset includes all building outlines with a roof area greater than or equal to 10m^2, which may include dwellings, garages, and large sheds. The version used for this analysis was last updated on 21 October 2025.

The dataset was imported into QGIS, where an 80-metre buffer was created around all buildings adjacent to the road network (Figure 3). Any building outline intersecting with an unsealed road was identified and

counted as a receptor. In accordance with the Dust Matrix methodology, an additional rule was introduced to account for road length variations:

- For road segments less than 1km, the dwelling count was applied directly.
- For road segments 1km or longer, a dwellings-per-kilometre value was calculated.

The resulting dwelling densities were then scored according to the NZTA Dust Matrix criteria to reflect the relative exposure risk associated with residential proximity to unsealed roads.

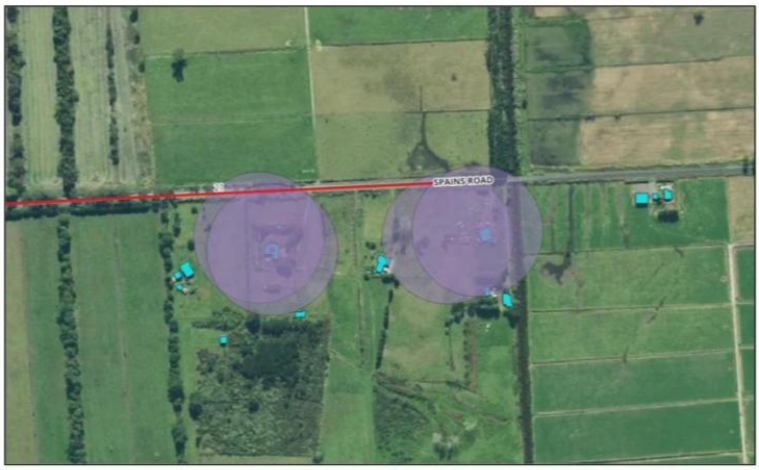

Figure 3: Buildings with 80m Buffer (LINZ)

Further spatial analysis was undertaken to visualise receptor concentration using a heatmap of building density (Figure 4). This enables more targeted assessment for longer road sections, for example, determining whether only the densely populated portions of a 7km road should be sealed, rather than applying dust-control measures along its entire length. The dwelling analysis therefore provides a critical indicator of receptor exposure, enabling prioritisation of unsealed road segments where residential proximity to dust emissions is highest.

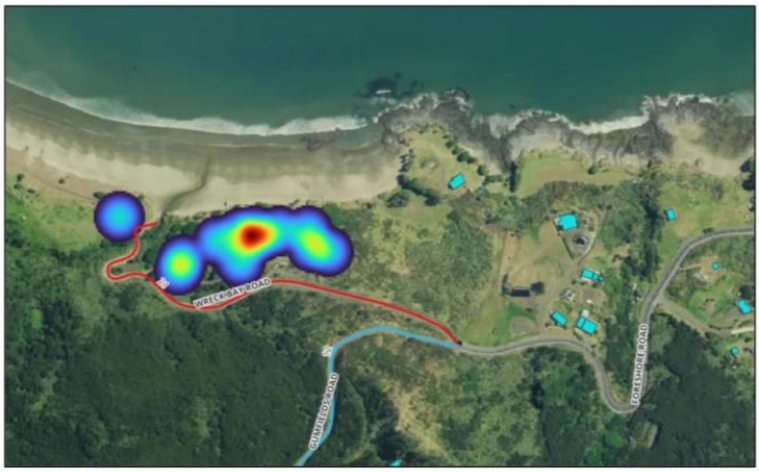

Figure 4: Heatmap of Building Outlines (LINZ)

2.2.2 GATHERING PLACES

Several other receptor types were considered to represent locations where people are likely to experience dust exposure. These included schools, marae, hospitals, bus stops, places of worship, and places of welfare.

Schools were sourced from the LINZ Schools dataset, which provides the boundaries of schools across mainland New Zealand. The dataset was originally compiled in early 2021 from National Map and authoritative sources, including the New Zealand Ministry of Education, and was last updated on 29 May 2025. Marae locations were obtained from the Te Puni Kōkiri website and were last updated on 4 September 2025. Bus stops were sourced from the Ministry of Education (MOE) website, while places of worship were obtained from the Eagle Disaster Response Programme. Places of welfare were provided by the Far North District Council (FNDC) GIS Team.

Although welfare locations were included in the model, they did not contribute to the results for the Far North District. In most cases, these facilities were situated along already sealed roads, and in others, they coincided spatially with marae locations.

Hospitals were excluded from this analysis, as it was determined that all road segments surrounding hospital facilities are already sealed.

The school dataset was provided in polygon format, while all other facilities were provided as point features. Each dataset was imported into QGIS, and an 80-metre buffer was created around every facility. Facilities intersecting with unsealed roads were identified and counted as receptor points.

The same calculation criteria applied as in the buildings analysis:

- For road segments shorter than 1km, the facility count was applied directly.
- For road segments 1km or longer, the facilities per km were calculated.

Each facility density value was then scored in accordance with the NZTA Dust Matrix criteria, providing an assessment of potential dust exposure risk associated with community and public-use facilities located near unsealed roads.

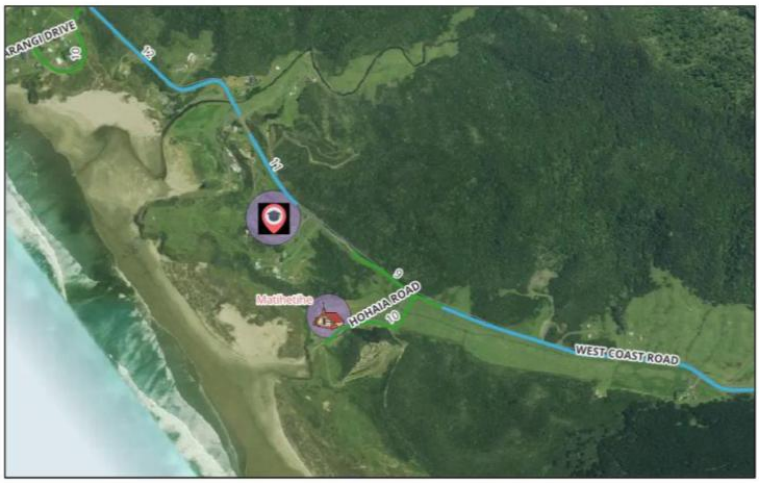

Figure 5: Other Locations Where People are Likely to be Exposed

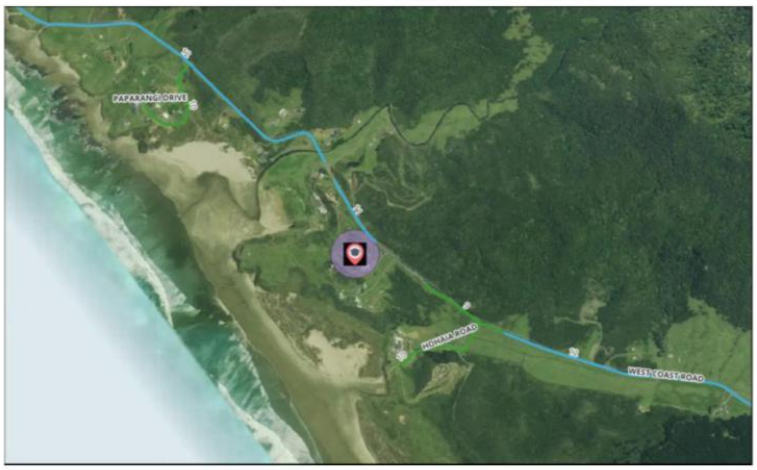

Figure 6: Schools (LINZ)

Figure 7: Marae (Te Puni Kōkiri)

Figure 8: Bus stops (MOE)

Figure 9: Places of Worship (Eagle Disaster Response Programme)

Figure 10: Places of Welfare (FNDC GIS Team)

2.2.3 ECOLOGY

In addition to residential and community receptors, ecological features were also considered, as these represent locations where dust emissions may have environmental impacts. Two ecological receptor datasets were considered for this analysis: known wetlands and rivers. The wetlands dataset was sourced from the Northland Regional Council (NRC) and represents identified wetland areas across the region, while the rivers dataset was obtained from LINZ and provides the national river and stream network.

Wetlands were supplied as polygon features, and rivers were provided as line features. Both datasets were imported into QGIS, where an 80-metre buffer was created around each feature to identify ecological receptors located near unsealed roads (Figure 11). Any unsealed road segment intersecting with a buffered ecological feature was identified and counted.

The same calculation criteria applied as in previous receptor analyses:

- For road segments shorter than 1 km, intersections were counted directly.
- For road segments 1km or longer, the ecology per km was calculated.

These ecological receptor counts were then scored in accordance with the NZTA Dust Matrix criteria, representing the potential risk of dust emissions affecting environmentally sensitive areas such as waterways and wetlands.

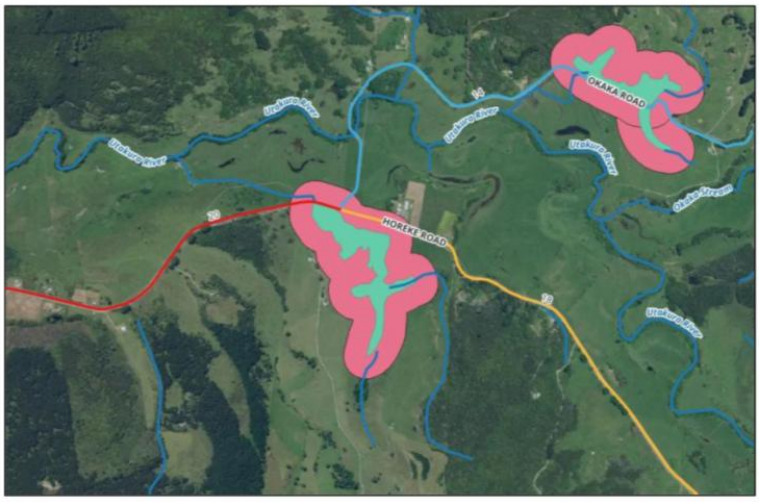

Figure 11: Ecology Wetlands (NRC) and Rivers (LINZ)

2.2.4 HORTICULTURAL

Horticultural land use was considered as a receptor type to represent areas where dust emissions may affect crop health and production. Data was sourced from two primary providers: the FNDC and LUCAS Land Use Map.

The FNDC dataset included mapped horticultural activities such as flower cultivation, fruit growing, vegetable production, viticulture, and packhouse locations. Complementary data from the LUCAS Land Use Map provided coverage of croplands, orchards, and vineyards across the district.

These two datasets were merged within QGIS to create a single horticultural layer. An 80-metre buffer was generated around all horticultural areas to identify locations within close proximity to unsealed roads (Figure 12). Any unsealed road segment intersecting a horticultural buffer was identified and counted.

The same length-based calculation criteria applied as in previous receptor analyses:

- For road segments shorter than 1km, intersections were counted directly.
- For road segments 1km or longer, the horticulture per km was calculated.

Horticultural proximity scores were then assigned in accordance with the NZTA Dust Matrix criteria, reflecting the potential for dust impacts on productive land and crop quality.

Figure 12: Horticulture (LUCAS & FNDC)

Collectively, the receptor analysis provides a spatially driven understanding of where unsealed roads have the highest potential to affect communities, ecosystems, and productive land, forming a critical input for prioritising dust-mitigation and road-sealing programmes within the Far North District.

2.3 SITE CHARACTERISTICS

The Site Characteristics component of the Dust Matrix captures physical and operational attributes of each unsealed road segment that influence dust generation and persistence. Unlike traffic and receptor factors, which focus on exposure and sensitivity, site characteristics describe the underlying environmental and usage conditions that contribute to dust potential.

This component was subdivided into three primary categories:

1. Location of Roadway – assessing surrounding landform, exposure, and environmental context.
2. Frequency of Rain – reflecting the natural dust suppression potential associated with local rainfall patterns.
3. Longevity of Logging Route Use – considering the intensity and duration of heavy vehicle use linked to forestry operations

2.3.1 LOCATION OF ROADWAY

The Location of Roadway factor within the Dust Matrix assesses the surrounding landscape and its influence on wind exposure, which directly affects the potential for dust dispersion from unsealed roads. The NZTA Dust Matrix defines three scoring categories for this parameter: Open Plains, Some Land Features to Slow Wind, and Inland Enclosed.

Given the topography and vegetation cover across the Far North District, the majority of unsealed roads are situated in environments characterised by a mix of rolling terrain, shelterbelts, and intermittent vegetation. These landforms and natural features typically act to reduce wind velocity and limit dust travel distance. Fully open plains are uncommon within the district, while few areas exhibit the dense terrain enclosure typical of the "Inland Enclosed" classification.

Based on these regional characteristics, all unsealed roads within the study area were conservatively assigned to the "Some Land Features to Slow Wind" category. This represents a balanced, district-appropriate assumption reflecting the general landscape conditions of the Far North and ensures consistency in dust exposure assessment across the network.

2.3.2 RAIN FREQUENCY

The Frequency of Rain factor within the Dust Matrix reflects the natural ability of rainfall to suppress dust emissions from unsealed road surfaces. The NZTA Dust Matrix categorises this parameter into three rainfall frequency bands:

1. More than two rainfall events per week,
2. Zero to one rainfall event per week, and
3. Less than one rainfall event every two weeks.

Rainfall frequency across the Far North District varies seasonally but is often characterised by extended dry periods, particularly during summer and early autumn months. Local climate data and historical rainfall records from NIWA and Northland Regional Council (NRC) indicate that many inland and northern areas experience low rainfall frequency during these months, with several weeks commonly passing between measurable rain events.

Given these climatic patterns, the Far North was assigned to the "Less than one event every two weeks" category. This classification aligns with observed dry-season conditions and provides a precautionary basis for assessing dust risk, ensuring that mitigation prioritisation reflects periods of highest dust-generation potential.

2.3.3 LONGEVITY OF LOGGING ROUTE USE

The Longevity of Logging Route Use factor within the Dust Matrix reflects the duration and intensity of heavy vehicle activity associated with forestry operations, which contributes to ongoing dust generation. The NZTA Dust Matrix defines three categories for this parameter:

1. Not a logging route,
2. 1–2 years, and
3. Longer than 3 years.

Data was sourced from both the Far North District Council (FNDC) and the LUCAS Land Use Map, each providing spatial information relevant to forestry activities. The FNDC dataset contained polygons representing forestry areas and carbon farming zones, while the LUCAS dataset included polygons of planted forests across the district.

These datasets were merged within QGIS to produce a combined representation of forestry land, and all roads intersecting a forest were identified as forestry routes and classified under the "1–2 years" category. Subsequently, information obtained from the Northland Wood Council provided further insight into forestry areas expected to remain active for extended periods. Based on this information, routes associated with forests anticipated to have continued harvesting or transport operations for three years or more were reclassified into the "longer than 3 years" category.

The resulting site characteristic scores complement the traffic and receptor components of the Dust Matrix, providing a balanced evaluation framework for identifying and prioritising roads most susceptible to dust generation and community impact.

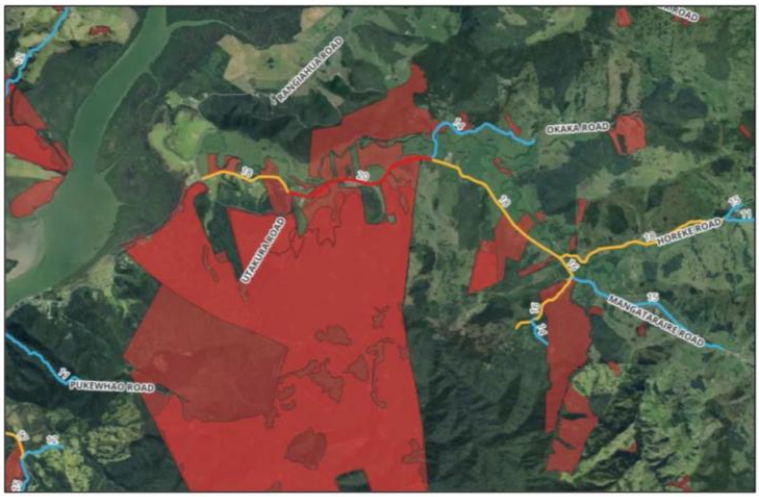

Figure 13: Forestry (LUCAS & FNDC)

3. CONCLUSION

The Dust Matrix assessment provides a comprehensive, spatially driven framework for evaluating dust risk across the Far North District's unsealed road network. By integrating multiple datasets and analytical processes within QGIS, the study combines three core components, Traffic, Receptors, and Site Characteristics, to produce a balanced and evidence-based representation of where dust generation and exposure are most likely to occur.

The Traffic component captures vehicle volume and speed characteristics, reflecting the primary drivers of dust creation. The Receptors component identifies the proximity of people, communities, and sensitive environments, quantifying potential exposure risk. The Site Characteristics component contextualises these factors within the broader environmental and operational conditions influencing dust behaviour.

Together, these components deliver a consistent, district-wide prioritisation tool that supports data-informed decision-making for dust mitigation, road maintenance, and sealing programmes. The resulting Dust Matrix not only highlights high-risk locations but also provides a transparent and adaptable methodology that can be updated as new datasets or field information become available.

Overall, this work enhances FNDC's ability to proactively manage unsealed road dust impacts, balancing environmental sensitivity, community wellbeing, and operational efficiency in future roading strategies.

4. RECOMMENDATIONS

While the Dust Matrix provides a robust foundation for assessing dust risk across the Far North District, further refinement and validation will enhance its accuracy and long-term usefulness. The following actions are recommended:

1. Field Validation

   Conduct targeted site visits to verify high-priority road segments identified through the matrix. Field validation will help confirm model accuracy and ensure that dust-control investments are directed where they are most needed.

2. Data Enhancement

   Improve the availability and precision of input datasets, particularly AADT counts, speed data, and frequency of rain, through collaboration with RAMM, NIWA and NRC. This will support more accurate, locally calibrated scoring.

3. Seasonal Updates

   Update rainfall and traffic datasets on a seasonal basis, with a particular focus on summer months, when dry conditions and increased traffic volumes contribute most significantly to dust generation. Prioritising summer-period data will ensure that the Dust Matrix more accurately reflects the conditions under which dust impacts are most prevalent.

4. Integration with Asset Management Systems

   Incorporate the Dust Matrix outputs into FNDC's RAMM or GIS asset management systems to support automated reporting, network visualisation, and decision-support for maintenance programming.

5. Future Expansion

   Consider extending the model to include additional environmental and social factors—such as road material type, vegetation cover, or population growth areas, to further strengthen its predictive capability.

Implementing these steps will ensure the Dust Matrix remains a dynamic decision-support tool, capable of evolving alongside FNDC's data systems and infrastructure management practices.

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FNDC SEAL OPTIONS					
Option	Cost /m2 /km	Benefit	Risk	Funding Options	Comment
1 Dust palliative sprayed on road with little or no preparation	$3.50/ $4.00/m2 25,000/km	• Quick easy • Satisfies customers in short term	• Very variable results • Poor quality control • Palliative blocks water nozzles resulting in uneven application • Very low benefit /cost • Customers who have had it applied (justifiably or not expect it year on year • Council undertakes unsubsidised – 2024 = $900k	• Currently non-subsidised • NZTA will fund sections that score "high" on their matrix and "possibly fund those that are "medium"	• Chemical applied by watercart – on hard surface does not penetrate-lasts between 2 weeks and 3 months – questionable quality and performance • Need a dust policy based around optimising funding and potentially user pays
2 Asphalt Millings	$10- 20m /m2	• Using millings from resurfacing sites • Material is waste/ recycled • Proven method – better than dust palliative	• Not as robust as traction seal	• Unsealed maintenance funds	• Recycling • Very low cost • Good result • Been used before • Program being developed
3 Dust palliative scarified into surface Grade scarifies surface palliative spread and grader works across road	$6/10/ m2 50,000/km	• Better mixing of product into surface	• Short term	• Non-subsidised • NZTA subsidy for roads that qualify	• Low benefit/cost ratio • Short term fix • Suggest trial 2025 and compare with option 1 above
4 Otta seal	$15/20 / m2 90,000/km	• Controls dust very well	• Must be applied to flat grades with good drainage	• Non-subsidised • NZTA subsidy for roads that qualify	• Well, proven process in NZ and internationally

FNDC SEAL OPTIONS					
		• Good benefit/cost ratio • Trials put in place last year performing well • Long lives up to 10 years • Need to consider rehabilitation options at that stage	• No or very low HCVs • Premature failure		• Need to customise design for FNDC • Recommend more trial sites 2025
5 Traction Seal	$60/m2 350,000/km	• Primarily for short (<400m)steep grades with high maintenance need	• Premature failure • Speed environment increases	• Unsubsidised • Unsealed maintenance subsidy if lest lifetime cost option • Subsidy if qualify form dust control • LCLR program	• NZTA approved up to $1m per GPS using unsealed maintenance • Larger multiyear program through LCLR
6 Seal Extension (level 1)	$95/m2 600,000/km	• Full design • Full construction in 1 season	• High cost • Low benefit/cost ratio for non NZTA dust matrix complying sites	• Low AADT means subsidy primarily related to qualifying for NZTA dust matrix • Needs to be applied for as art of NLTP application	• Difficult to achieve subsidy
7 Seal Extension (staged Construction)	• Varies dependent upon where costs can be allocated • Final seal cost can be $30/40/m2	• Optimises NZTA funding, undertaking drainage, preliminary works in 1/2 seasons prior to sealing	• Low risk	• Funding over multi years from several funding codes as well as unsubsidised as needed • Optimal delivery mechanism for seal extensions	

Ordinary Council Meeting

Item 7.8 - Attachment 5 -