

**BEFORE A HEARINGS PANEL  
OF THE FAR NORTH DISTRICT COUNCIL**

**I MUA NGĀ KAIKŌMIHANA MOTUHAKE O TE HIKU O TE IKA**

<b>Under the</b>	Resource Management Act 1991 ( <b>RMA</b> )
<b>In the matter</b>	of a request for rezoning of land in the Kerikeri-Waipapa area under the proposed Far North District Plan

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**SUMMARY STATEMENT OF EVIDENCE OF PHOEBE LOUISE ANDREWS IN SUPPORT OF  
SECTION 42A REPORT FOR HEARING 15D**

**ECOLOGY**

**6 October 2025**

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**Sarah Mitchell / Tim Fischer**

T: +64-9-358 2222

sarah.mitchell@simpsongrierson.com

tim.fischer@simpsongrierson.com

Private Bag 92518 Auckland

## **1. INTRODUCTION**

**1.1** My name is Phoebe Louise Andrews. I prepared a statement of evidence in relation to a rezoning request by Kiwi Fresh Orange Company Limited (**KFO**) in the Kerikeri-Waipapa area under the proposed District Plan of the Far North District Council (**Council**). I refer to my qualifications and experience in my original statement, dated 10 September 2025, and do not repeat these details here.

**1.2** The purpose of this statement is to provide a brief summary of my evidence and to provide an initial response to the rebuttal evidence of KFO, noting that a full right of reply will be provided by the s 42A team (including additional expert input as required) following the hearing.

## **2. SUMMARY OF EVIDENCE**

### **Site description and proposal**

**2.1** The site comprises a mix of pasture, cropping, and freshwater habitats, including streams and wetlands associated with the Kerikeri River and Puketotara Stream that are buffered by mature indigenous forest.

**2.2** The proposed rezoning includes changing from rural to live urban zoning across the 197 hectare site between the Kerikeri and Waipapa townships. KFO's proposal includes rezoning with specific precinct provisions and will require the development of a floodway structure to manage flood hazards. The floodway is placed within an existing flow path and is required to facilitate urban development across most of the site.

### **KFO ecological assessment methodology**

**2.3** The Ecology Report and evidence of Ms Barnett provide high-level assessments. Some information has not been fully addressed, including:

- (a) mapping and delineation of freshwater habitats across the site;

- (b) targeted fauna surveys, in particular for bats and mudfish; and
- (c) assessment of areas mapped as significant by the Department of Conservation.

**2.4** A field-based definitive assessment, including delineation of all freshwater features, targeted fauna surveys, and assessment of significant areas, would provide better context for understanding the proposal and its associated effects, particularly around the proposed floodway location and forested gully.

**2.5** Due to the lack of a detailed design, high-level assessments can only be based on assumptions. If these assumptions are incorrect, the development of the site as an urban area may ultimately result in significant residual adverse effects on biodiversity, such as improper riparian or bat corridor setbacks, and improper management of lighting and noise.

#### **Effects management**

**2.6** As discussed, a number of uncertainties remain regarding the ecological values at the site, and therefore the associated effects of the proposal. The effects that are still poorly understood include:

- (a) effects on bats from roost tree removal and increased lighting;
- (b) effects on fauna, including mudfish, if they are present; and
- (c) effects associated with the proposed floodway on streams and wetlands and the downstream receiving environment.

**2.7** For a greenfield proposal of this scale, and to enable proper assessment of the KFO proposal, I consider that a full list of the proposed provisions relating to ecology (e.g. riparian setbacks, vegetation removal thresholds, etc) should have been provided along with a more detailed assessment of the potential effects, which may require more detailed on-site surveys and appropriate management

measures. This would require a better understanding of the ecological features of the site as set out above.

- 2.8** If assumptions about the values at the site are incorrect, the proposed rezoning may ultimately result in significant residual adverse effects on biodiversity.

### **3. RESPONSE TO MATTERS RAISED IN KFO REBUTTAL EVIDENCE**

- 3.1** Some of the ecological effects described in the rebuttal evidence can be adequately addressed at resource consent stage, including:

- (a) Potential effects on lizards can be managed through site surveys and the preparation of management plans at resource consent stage. This approach is appropriate as habitats can change over time, as detailed by Ms Barnett. Additional controls should be provided under the zoning provisions for non-protected vegetation, that may provide habitat for lizards.
- (b) Avoidance of remnant habitats along the Kerikeri River can mostly be achieved through the provision of esplanade reserves at resource consent stage. However, as mentioned in the report by EcologyNZ, the esplanade reserve width should be increased in places to encompass all riparian vegetation. The zone change should include provisions to reflect this.

- 3.2** However, my view is that further consideration should be given to the following:

- (a) the increase of pests and predators (including pets), as the site borders a sensitive ecological environment;
- (b) effects of lighting and roost tree removal on bats; and
- (c) effects of the construction of the floodway on stream and wetland habitats.

- 3.3** While generally the loss of bat habitat and direct effects on bats can be addressed at resource consent stage, large standalone trees (particularly exotic trees that may provide roosting habitat) do not have protection under the PDP and may be removed without consent. Ideally, KFO will incorporate specific precinct provisions requiring any resource consent application on the site to consider if removal of trees over 15cm dbh is required, and if so to implement best practice bat roost tree removal protocols.
- 3.4** In addition, as there is a lack of surveys for bats in the local area, it is not known whether or not indigenous bats use the site or the forested gully as a corridor. Formal surveys and assessments would guide the requirements for setbacks of urban development and lighting, and specific lighting controls. These types of controls should be incorporated into specific precinct provisions. This approach has been implemented in other rezoning/plan changes such as the Peacockes Structure Plan in Hamilton.
- 3.5** While a high-level assessment of the effects associated with urban development is generally sufficient at this stage of rezoning, this does not extend to the proposed floodway. As the proposed floodway will be required to facilitate urban development across most of the site, a detailed Ecological Impact Assessment should be provided prior to approving the rezoning. This will be required to fully understand if the rezoning of the site is practical and appropriate.
- 3.6** As wetlands and streams have not been fully mapped and described within the floodway footprint, it is not possible to fully understand the potential losses of these habitats that may result from its construction. The National Policy Statement for Freshwater Management requires offsetting of values and extent of natural inland wetlands. Therefore, creation of wetlands may need to be incorporated into the floodway design. My view remains that the provision of a full Ecological Impact Assessment before the land is rezoned would help to ensure that there are

appropriate opportunities for mitigation and offsetting and provide confidence that any ecological impacts can be appropriately managed.

Phoebe Andrews

6 October 2025