



## RURAL REZONING REQUESTS

### FNDC Proposed District Plan Hearing 15C October 2025

#### Statement of lay evidence on rural rezoning requests

On behalf of community groups Vision Kerikeri, Carbon Neutral Trust, Kapiro Conservation Trust and other submitters

#### Relevant submissions:

- S522, s526, fs569 Vision Kerikeri
- s444, s449 & fs566 Kapiro Conservation Trust
- s529 Carbon Neutral NZ Trust

Our submissions are supported by: fs337 K Mahoney; fs333 M Hart; fs443 P Donnellon; s68 D Putt; s83 & fs342 C Baker; s88 D M Pope; s89 I Pope; s144 T Clarke; s564 J Christensen; s558 J Neison; s181 & fs335 C & M Sawers; s76 J Putt; s537 & fs353 A Panckhurst; s162 D Pope; s145 & fs334 F Clarke; fs390 T Schubert; fs338 P Mahoney ; fs550 L Anderson; fs336 R Holman; fs352 K Panckhurst; fs549 V Anderson and others

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## 1. About our community groups

Vision Kerikeri, Carbon Neutral NZ Trust and Kapiro Conservation Trust are not-for-profit community groups. Our groups have numerous members with professional expertise covering many fields. Vision Kerikeri volunteers have contributed information to the Council and others for more than two decades, seeking improvements in urban and district planning and greater protection for the natural environments.

We represent residents and ratepayers who are deeply invested in the future of the Kerikeri community - not for personal gain, but for the wellbeing of our land, rivers, people, flora and fauna, and the climate. We seek to avoid further residential sprawl in rural areas, reduce carbon emissions, support active transport, and achieve a more compact urban/residential footprint in future. We seek appropriate forms of development in appropriate locations.

We oppose the requests for rural residential upzoning. The s42 expert evidence on market economics concludes that there is a large over-supply of rural residential capacity (details below). Upzoning would create even more residential sprawl in rural areas, fragment productive land, undermine intensification efforts in urban areas, create additional traffic impacts, climate change emissions, etc. We consider that upzoning requests do not meet key criteria for rezoning.

We support the Horticulture Precinct zoning.

## 2. MARKET DEMAND, PDP-ENABLED CAPACITY AND OVER-SUPPLY

We are aware that FNDC has consented hundreds of rural subdivisions in the past decade. There is currently a very large surplus of bare lots that have not yet been built on.

Moreover, the market demand for bare lots has slumped. Last year, only about 12 bare sections (less than 1 ha) were sold in the greater Kerikeri area.<sup>1</sup> The average number sold in the past 3 years was only 14 bare sections per year (<1ha).

Figure 1 (below) shows that the trends over the past 25 years. The annual sales peaked in 2003-2005 and have been declining since that time.

In the past couple of years, sales have fallen to the lowest level seen in the past 25 years, probably as a result of covid, the economic downturn and the high cost of construction.

### 2.1 s42 evidence demonstrates ample rural residential capacity in notified PDP

A key message from the s42 expert evidence on Market Economics is that the notified PDP provisions already provide ample capacity to accommodate projected demand for rural dwellings:

**'Focusing on rural areas, the PDP enables approximately 3,448 detached dwellings and 572 attached dwellings, providing a total rural PEC [Plan-Enabled Dwelling Capacity] of 4,020 dwellings. This compares to a projected rural household demand of 1,451 households over the 30-year period, which increases to 1,705 households when applying the NPS-UD competitiveness margin.'**<sup>2</sup>

The s42 Market Economics evidence identifies a substantial over-supply of rural residential capacity in the notified PDP zoning:

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<sup>1</sup> Annual data on sales of bare land under 1 hectare in greater Kerikeri area, which is approximately equivalent to the Kerikeri High School zone. Data compiled by real estate agents operating in this area.

<sup>2</sup> S42 report Hearing 15C, Appendix 3 Market Economics evidence, p.9.

**‘Rural capacity exceeds expected demand by more than 2.3 times** indicating that significant headroom already exists to accommodate rural growth.’<sup>3</sup>

**Figure 1: Annual sales of bare lots (less than 1 ha) in Kerikeri area, 2000 - 2025**

Year	Number of bare lots sold per year (less than 1 ha)
2000	47
2001	38
2002	51
2003	113
2004	135
2005	193
2006	96
2007	85
2008	25
2009	60
2010	30
2011	50
2012	48
2013	32
2014	60
2015	59
2016	90
2017	58
2018	34
2019	47
2020	65
2021	53
2022	21
2023	9
2024	12
2025 Jan - Aug	12

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<sup>3</sup> S42 report hearing 15C, Appendix 3 Market Economics evidence, p.4.

A major concern from an urban planning perspective is that this large over-supply of rural lots will strongly discourage intensification of the urban zones, undermining a key goal of the PDP and Kerikeri-Waipapa spatial plan (KWSP).

Upzoning additional rural areas will **increase** the over-supply.

S42 Market Economics report estimated the change in Plan-Enabled Dwelling Capacity (PEC) if all rural rezoning requests are adopted – their table is reproduced in Figure 2 below.

The estimated change in PEC for detached rural dwellings (Figure 2) indicated that the requested rural upzoning would increase capacity by 60% in Rural Lifestyle and 128% in Rural Residential.<sup>4</sup>

**Figure 2: s42 Market Economics evidence: Estimated change in PEC if all rural rezoning requests are adopted. Source: Table 8 in s42 Appendix 3 expert evidence on market economics**

Zone Name	PEC Detached		Change %Change	
	Recommended provision	Recommended provision + Rural Zoning Requests		
General Residential	6,292	6292	0	–
Horticulture	–	–	–	–
Kororāreka Russell Township	189	189	0	–
Rural Lifestyle	282	450	168	60%
Rural Production	1,866	1861	-5	<1%
Rural Residential	2397	5457	3,060	128%
Settlement	294	412	118	40%
<b>Total</b>	<b>11,320</b>	<b>14,661</b>	<b>3,341</b>	<b>30%</b>

s42 Market Economics evidence concluded that the **requested rural upzoning would increase PEC capacity substantially, by about 30%:**

‘... enabling the requested rezonings on top of Council’s recommended subdivision provisions, would increase total detached PEC by approximately 3,341 dwellings, lifting the district-wide capacity from 11,320 to 14,661 dwellings, a 30% increase. **The majority of this uplift occurs within the Rural Residential zone, which sees an increase of 3,060 dwellings...**’

We are concerned that creating additional houses in rural areas increases the travel distances for work, schools and services, increases emissions and transport network issues, and undermines the PDP’s strategic direction for supporting more compact urban form.

It makes no sense to increase the supply of rural lots when the supply is already 2 times larger than projected demand.

## 2.2 s42 evidence does not indicate the need for additional rural upzoning

The s42 Market Economics evidence report concludes that the evidence does not support a need for rural upzoning, and recommends declining the rural upzoning requests:

- ‘the existing PDP provisions already provide ample capacity to accommodate projected rural demand’ ....
- ‘The analysis confirms that the PDP, as notified, already enables more than sufficient capacity to meet projected rural and settlement demand over the next 30 years... rural plan-enabled capacity significantly exceeds expected growth.’

<sup>4</sup> S42 report Hearing 15C Appendix 3 Market Economics evidence p.8, Table 8.

‘While submitters have requested rezoning ... to more intensive rural categories, **the evidence does not support a need for such changes.**’<sup>5</sup>

The requested additional zoning ‘is not required to satisfy demand, a deficit (capacity) is not evident in the PDP provisions. In fact, being too permissive is likely to lead to adverse outcomes...’<sup>6</sup>

‘Based on the findings of this analysis, **it is recommended that Council decline rezoning requests to more intensive rural zones** considered under hearing 15C, and retain the PDP’s proposed zoning, which already provides sufficient flexibility and capacity to meet rural housing demand.’<sup>7</sup>

We agree with the evidence above. We have reviewed the criteria for rezoning and have considered other factors in the rural rezoning requests. We agree that the rural upzoning requests should be declined.

### 3. TRAFFIC AND TRANSPORT NETWORK IMPACTS

Trip generation estimates typically used in the operative district plan indicate that each new household can be expected to generate about 10 vehicle movements per day, based on the standard ODP traffic assumption. Rural dwellings generate more trips than urban dwellings.

Transport distances, climate emissions and other adverse effects are higher from rural dwellings, as noted in s42 transport evidence:<sup>8</sup>

‘The literature demonstrates that sprawl can lead to negative effects.... including increased pollution, lower uptake of active modes, reduced access to primary services, limiting agricultural land, and higher infrastructure and transport costs (Holmes, 2017).’

‘Residential expansion into rural areas can place pressure on existing rural roads and intersections may not be designed for higher traffic volumes, with potential negative safety outcomes and accelerated asset wear. This can create challenges for Council’s transport infrastructure funding, where demand is generated ...’

‘... cumulative transport effects are challenging to address at resource consent stage.’

The S42 report evidence on transport noted that the Beca transport memo identified several risks for the future transport network, which included:<sup>9</sup>

- The capacity of the Heritage Bypass. Traffic modelling of the base scenario indicated traffic volumes on the Bypass will remain within capacity of the corridor, over the longer term capacity of this route could become an issue if traffic between Kerikeri and Waipapa continues to increase.
- Capacity of the SH10 / Waipapa Road roundabout. Traffic modelling indicates this roundabout may become congested in future.

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<sup>5</sup> S42 report hearing 15C Appendix 3, p.9.

<sup>6</sup> S42 report hearing 15C Appendix 3, p.9.

<sup>7</sup> S42 report hearing 15C Appendix 3, p.9.

<sup>8</sup> S42 report hearing 15C Appendix 3 p.18-30, Transport evidence p.2.

<sup>9</sup> S42 hearing 15C rural rezoning, Appendix 3, Transport review evidence section 3.

### 3.1 Heritage Bypass traffic catchment

The S42 evidence on transport examined the transport network impact of various requests for rural upzoning. For example, it noted that:<sup>10</sup>

An additional 19-33 lots in a rural farm to the north of Kerikeri ‘could generate approximately 25-43 veh/hr and 223-405 veh/day, based on the trip generation rates.... While this may not seem to be significant, **it would have a direct effect on the capacity of the Heritage Bypass, which is anticipated to be under significant pressure in the future**’ (as discussed in section 3 of s42 transport evidence).

An additional 36 dwellings generated by RRZ upzoning near Waipapa ‘could generate approximately 47 veh/hr and 440 veh/day.... While this may not seem to be significant, **it would have a direct effect on the capacity of the Heritage Bypass**, which is anticipated to be under significant pressure in the future...’

We concur that these types of network-wide traffic and cumulative traffic effects should be taken into account to avoid direct effects on road capacity in vulnerable locations such as the Heritage Bypass.

### 3.2 Landing Road northern traffic catchment

Landing Road bridge is one of the busiest one-lane bridges in Northland.

Mr Dean Scanlen, transport engineer, made a transport network assessment in 2022 of the northern traffic catchment on the north side of Landing Road bridge.<sup>11</sup> The northern catchment covers a large rural area indicated by the red boundary in Figure 3. This catchment includes Kapiro Road, Purerua Road, Redcliffs Road, Kingfisher Road, Skudders Beach Road and all linked side-roads.

We note that each new house consented in the northern catchment would add about 10 vehicles/day on local roads (according to ODP standard traffic assumption). That means:

- 100 new houses would add 1000 vehicles per day; 200 new houses would add 2000 vehicles per day.
- Most of this extra traffic would travel to and from central Kerikeri via the one-lane bridge on Landing Road.

Mr Scanlen’s traffic analysis estimated that:

‘at full permitted development of the catchment of the Landing Road bridge, plus that from submitted consents [but not yet approved at that time], subdivision applications and the proposed subdivision, all also at **full development, the traffic on the Landing Road bridge will be more than 10,000 movements per day.**’

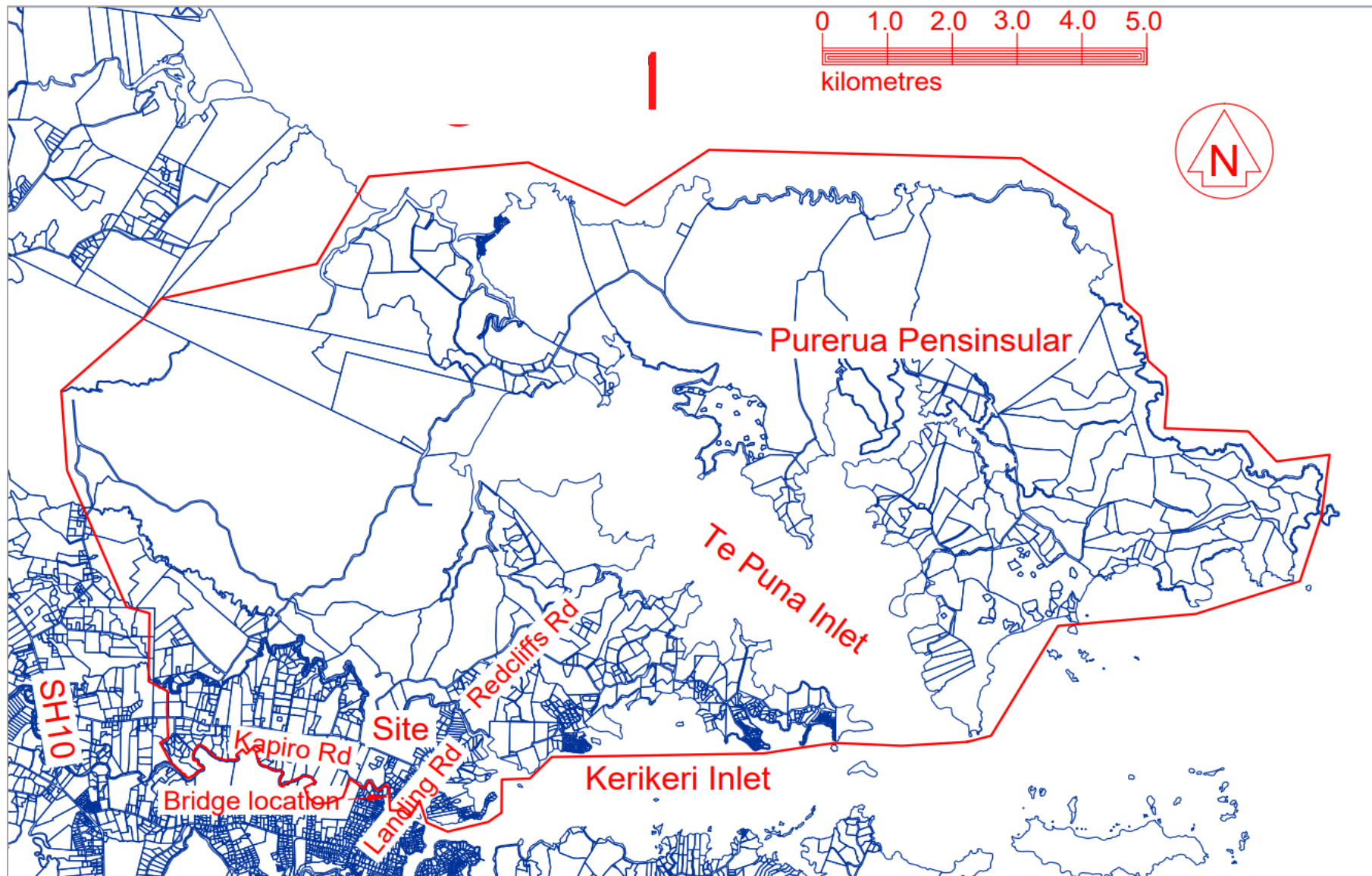
Mr Scanlen’s detailed calculations are summarized in Figure 4 below. Please note his data refers to the situation in 2022. Additional consents for subdivision have been issued since, often for residential densities that are greater than the controlled activity.

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<sup>10</sup> S42 hearing 15C rural rezoning, Appendix 3, Transport review evidence section 4.5 and 4.2.

<sup>11</sup> D. Scanlen transport network analysis of Landing Road bridge catchment, 2022.

Figure 3: Northern traffic catchment in rural area north of Landing Road one-lane bridge (Scanlen, 2022)



Source: D. Scanlen transport network analysis of Landing Road bridge catchment, 2022, Figure 1.



**Figure 4: Calculations of traffic per day on Landing Road bridge (Scanlen, 2022)**

Location Description	Number of developable lots	Estimated traffic generation per day per lot AADT	Estimated to use Landing Rd, full permitted development	
			Proportion	AADT
CRZ (Opito and Doves Bays, Rangitane)	185	10	85%	1573
CLZ excluding the site (mostly along Redcliffs Rd)	170	10	85%	1445
Purerua and Rangihoua Roads (various zones)	556	6	50%	1668
Purerua and Rangihoua Roads (known subdivision)	90	6	50%	270
Kapiro Rd east (north of Waipetakoura River)	340	10	75%	2550
Other RP & GCZ (all Redcliffs Rd)	172	10	85%	1462
Other known subdivision	45	10	85%	383
Site subdivided	124	10	85%	1054
<b>Total:</b>	<b>1682</b>			<b>10405</b>

**Notes:**

‘CRZ’ is the land zoned Coastal Residential within the catchment area, CLZ is land zoned Coastal Living, RP is Rural Production land and GCZ is the General Coastal zone.

‘AADT’ is Annual Average Daily Traffic or all traffic movements in a 12-month period divided by 365.

**Catchment assessment method:** To define the road catchment of the bridge, Mr Scanlen downloaded cadastral data and aerial photography from LINZ, determined which properties lead to roads that, in turn, lead to Landing Road, then counted the lots within that area that are large enough for development and are not publicly owned. Scanlen’s report noted that not all traffic generated in the catchment would use Landing Road, but a significant proportion would do, and his analysis includes estimates of those proportions. He included various consented but as yet unimplemented resource consents and applications still in process, in the identified area, at the time of his assessment (February 2022).

**Source:** D. Scanlen transport network analysis of Landing Road bridge catchment, 2022, Table 2.

### 3.3 Effect of residential development in northern traffic catchment

Mr Scanlen’s assessment concluded that, at full ‘permitted’ development of the catchment, **the capacity of the bridge on Landing Road will be exceeded at peak times:**

‘My analysis indicates that, at full permitted development of the road catchment of the bridge, the demand on it will regularly exceed its capacity ....’

His analysis and traffic count data show that, specifically:

‘at full permitted development including the proposed subdivision, the ‘practical capacity’ of the bridge will be exceeded over four hours on an average weekday. That is, over at least one hour in the morning and also during at least three hours in the afternoon starting around 3pm, so for a total of some 20 hours each week.’

Mr Scanlen noted that his analysis does not factor in future subdivision in the catchment for which applications have not yet been lodged, as of February 2022:

‘Those have the potential to create many more lots again. A broad-brush assessment based on current lot sizes in the catchment and current subdivision rules indicates scope for at least another 200 future lots just as controlled-activity subdivisions, with significantly greater numbers again with restricted-discretionary subdivisions and/or land-use.’



Additional developments that are more dense than the controlled activity in the ODP will worsen the situation, adding to the future capacity issue.

We note that rural upzoning would have similar effects.

### **3.4 Safety issues noted in Mr Scanlen's traffic analysis**

Mr Scanlen's report noted several safety concerns.

#### **Safety issues around the bridge:**

'I am also concerned about the safety of the bridge, especially with increasing traffic demand on it. The traffic report estimates that vehicles approach the bridge at speeds of 40 km/hr<sup>17</sup>, but I measured 85 percentile operating speeds of 57 km/hr northeast-bound and 63 km/hr southwest-bound. The combined safe stopping sight-distance for those speeds, on the downhill gradient approaching the bridge in both directions, is more than 150 metres, but only 140 metres of forward visibility is available in places.'

'I acknowledge that this has not resulted in head-on collisions since at least the start of 2017, but the associated risk can only escalate with increased traffic.'

#### **Another visibility restriction:**

'Another visibility restriction in relation to the Landing Road bridge is southwest of the give-way limit lines. The visibility in that direction exceeds the safe stopping sight distance from the limit lines themselves, but does not do so when there are queues waiting to cross the bridge. As the traffic demand on the bridge increases, queues, including lengthy queues, will become increasingly common and this risk will also continue to escalate.'

#### **Lengthy queues also create hazards elsewhere:**

'Lengthy queues also create hazards elsewhere along Landing Road, on which there are a number of locations with restricted forward visibility. Drivers unfamiliar with the locality, especially holidaymakers, are not likely to expect queues of vehicles in a locality like this.'

#### **Maintenance costs of timber deck on bridge:**

'Landing Road bridge also has a timber deck for which maintenance costs are significantly higher than those with other materials. This is another aspect that will continue to escalate with increased traffic.'

If useful to the Panel, we could ask permission to provide a copy of Mr Scanlen's report.

### **3.5 Adverse effects on the community in Landing Road area**

The majority of traffic generated in the northern traffic catchment goes to/from Kerikeri via Landing Road. Upzoning in the northern traffic catchment will have adverse effects on people living in the Landing Road area in particular. The statement of lay evidence today by M Hart, K Mahoney and other submitters will describe the adverse effects of additional traffic in that area. Upzoning will have permanent cumulative adverse effects on amenity values, such as:

- More noise, vibration and disruption from traffic, especially during busy periods, and at night.
- More noise and loud 'bang' sounds from the bridge itself, due to the wooden timber deck that works loose over time due to traffic pressure. And this brings extra maintenance costs for Council.
- Increased traffic congestion around the bridge and near the primary school
- More safety issues, more 'near misses' between vehicles and pedestrians.

- More fumes and pollution, especially at the swimming hole and green reserves next to the bridge.
- Loss of rural character in the northern part of Landing Road.
- Loss of heritage and ecological values in the area around Landing Road bridge – an historic area called Waipapa Landing. The statement by M Hart and others includes a report about the ecological and historical values of the area.

Our groups and other submitters recognize the cumulative adverse effects such as these on the affected community around Landing Road. We oppose upzoning requests in the northern traffic catchment.

#### 4. WAIPAPA LANDING HISTORIC AREA

The s42 report for Hearing 15D mistakenly believed that our groups' submissions (s449, s522, s529) sought 'Sport and Active Recreation' zoning (para. 185) for Waipapa Landing area. (Perhaps the s42 report might have confused Waipapa Landing with a separate request relating to the new Sports Hub in Waipapa on SH10.)

In 2022, our original PDP submissions by Vision Kerikeri, Kapiro Conservation Trust and others (s522, s449, s529) requested that the grounds around Cherry Park House should be Natural Open Space, as follows:

'Waipapa Landing: The area around Waipapa Landing and Cherry Park house grounds should be recognised for its history, ecological, riparian and coastal values, and as an area for peaceful enjoyment of the natural environment. The zoning of the grounds around Cherry Park house should be changed to Natural Open Space.' (s522, s449, s427, s529)

Another submitter group said 'The area around Waipapa Landing and Cherry Park house grounds should be recognised and preserved as a public recreational reserve.' (s338)

Since making our submissions in 2022, we have learned much more about the historic heritage of Waipapa Landing area. We now support the local community in seeking a **heritage overlay or other type of protection relating to conservation** to protect the ecological and historic values in this area, as indicated in the report on Waipapa Landing heritage attached to the statement by M Hart and others (Hearing 15C statement).

We consider that a **heritage overlay or similar level of protection** would be more appropriate for protecting the Waipapa Landing area, as indicated by the local community. Moreover, we now believe the appropriate forum to raise and consider the historic information and an integrated protection approach for the Waipapa Landing area would be future discussions on the Spatial Plan and future structure plan for Kerikeri, with the residents who live around Waipapa Landing, the local community and hapu that have historic links to Waipapa Landing area.

#### 5. SOUTHERN KERIKERI ROAD TRAFFIC AND OTHER ISSUES

We have reviewed the criteria for rezoning. We do not support upzoning requests in the southern part of Kerikeri Road for multiple reasons. For example:

- Kerikeri is like a large cul-de-sac. The only way in or out of Kerikeri is via SH10 on the west side of the township, travelling on Kerikeri Road or Waipapa Road. Kerikeri Road is the main route in and out of Kerikeri. FNDC has stated that Kerikeri Road is the busiest road in the District. Relatively small traffic issues can easily make Kerikeri Road congested.
- Southern Kerikeri Road has a large area of good quality land for horticulture, some of the most productive orchards in the area, and this is supported by high-value irrigation infrastructure (an underground network of pipes).

Our comments at Hearing 15D will provide further information on reasons to avoid upzoning in the southern part of Kerikeri Road.

We oppose upzoning requests in the southern part of Kerikeri Road.

## **6. HORTICULTURE PRECINCT**

Vision Kerikeri, Carbon Neutral Trust, Kapiro Conservation Trust support the Horticulture Precinct to protect horticultural production, support local economic wellbeing, and avoid further residential/urban sprawl in those areas ... on condition that the PDP will adopt strong controls that will protect the traditional rural character and the amenity values that are valued by the community.

We support the Horticulture Precinct recommended by s42 report based on the delineation analysis provided by Dr Reece Hill (s42 Appendix 4 evidence).

The Horticulture Precinct is important for the future of Kerikeri/Waipapa area, in order to:

- Protect productive land from further fragmentation, residential development and urban sprawl.
- Protect LUC 2, 3 and 4 and other land that is suitable for horticulture (due to irrigation or other factors) for future generations and local food security.
- Protect the highly valuable irrigation infrastructure (extensive underground network of pipelines) that support production on the north and south sides of Kerikeri.
- Support economic wellbeing and benefits to the community. and service industries, due to horticultural activity in the Kerikeri area. We note that Māori horticulture is increasing (nationwide Maori horticulture in 2020 was: \$220m output; 300% growth since 2006; area & jobs rapidly increasing [Berl 2020]).

Please refer to further information to support these points in our statement at Hearing 9 (horticulture zone section).

## **7. CONCLUSION**

Vision Kerikeri, Carbon Neutral Trust, Kapiro Conservation Trust support the Horticulture Precinct rezoning boundaries recommended in the s42 report.

We have reviewed the criteria for rezoning. We oppose the rural rezoning requests, based on our analysis of the rezoning criteria and other factors such as the need to avoid further urban/residential sprawl in rural areas and cumulative traffic impacts. Sprawling residential growth and sporadic patterns of development brings many negative effects – it undermines the need provide a more compact urban form; it generates longer driving distances for basic services, climate emissions; it fragments rural land, reduces the area of productive land, and undermines the character and amenity values of rural areas and coastal areas.