

**BEFORE HEARINGS COMMISSIONERS APPOINTED
BY THE FAR NORTH DISTRICT COUNCIL**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on the Proposed
Far North District Plan

SUBMITTER Carrington Estate Jade LP and Carrington Farms
Jade LP

HEARING TOPIC: Hearing 15A – Rezoning General, Kauri Cliffs &
Carrington Estate

STATEMENT OF PLANNING EVIDENCE OF STEVEN REMANA SANSON

11 August 2025

INTRODUCTION

1. My name is Steven Remana Sanson. I am a Director / Consultant Planner at Sanson and Associates Limited and Bay of Islands Planning [2022] Limited.
2. I have been engaged by Carrington Estate Jade LP and Carrington Farms Jade LP¹ [CEJ], to provide evidence in support of their submission to the Proposed Far North District Plan (PDP).
3. I note that while the Environment Court Code of Conduct does not apply to a Council hearing, I am familiar with the principles of the code and have followed these in preparing this evidence.

QUALIFICATIONS AND EXPERIENCE

4. I hold the qualification of Bachelor of Planning [Hons] from The University of Auckland, graduating in 2013 and I am an Intermediate Member of the New Zealand Planning Institute.
5. I have over 10 years' experience and have previously held planning positions in the Far North District. In my current role I regularly advise and assist corporate and private individuals with the preparation of resource consent applications including subdivision and land use consents and relevant regional council consents. I have also processed resource consent applications for councils, prepared submissions on district plan changes, and processed plan changes.

SCOPE OF EVIDENCE

6. Hearing 15A addresses submission points relating to the PDP – Rezoning General, Kauri Cliffs, & Carrington Estate topics. The s42A reports splits these matters into four reports and include:
 - Rezoning Submissions Overview;
 - Rezoning General Request – Open Space Zones;
 - Kauri Cliffs Special Purpose Zone; and
 - Carrington Estate Special Purpose Zone.
7. I have been asked by CEJ to provide expert planning evidence arising from their submission in relation to the Carrington Estate Special Purpose Zone [CEZ].
8. I have adhered to the instructions of hearing Minute 1 'take a lead from the s42A Report in terms of content of evidence, specifically that evidence highlights areas of agreement and disagreement with the s42A Report, outlines any changes in Plan wording proposed

¹ Submission 351

(along with the rationale for these changes) together with an assessment pursuant to s32AA of the RMA¹.

ORIGINAL SUBMISSION 351 AND RELIEF SOUGHT

9. The submission by CEJ generally supported the CEZ as notified in terms of the mapped extent².
10. It also supported the General Residential and Mixed Use Zones that applies to its landholdings outside of the CEZ³.
11. In relation to its landholdings outside of the CEZ, CEJ also sought the application of the General Residential Zone⁴, a Mineral Extraction Overlay⁵, and the Light Industrial Zone⁶.
12. In terms of provisions, there were some amendments sought in the CEJ as follows:
 - Allowing primary production activities⁷;
 - Amending transportation rules to include reference to the Carrington Estate Development Plan and Schedule⁸; and
 - Amending earthworks and vegetation clearance rules to include reference to the Carrington Estate Development Plan and Schedule⁹.
13. Lastly, the submission introduced a wide scope to consider all provisions relating to the CEZ to ensure that the relevant resource consent approvals were not compromised, lost, or diminished through the plan change process¹⁰.
14. In my view, this submission point above provides scope to consider all provisions within the CEZ.

SECTION 42A REPORT

Key Issue 1: General Submissions

15. In terms of an amendment sought by HMKT to the Coastal Environment Overlay to include the entire CEZ, I agree with the s42A report writer and the evidence produced to date stating there is insufficient reasoning and detail to make amendments. I concur

² Submission Point S351.001

³ Submission Points S351.002 and S351.003

⁴ Submission Point S351.004

⁵ Submission Point S351.005

⁶ Submission Point S351.006

⁷ Submission Point S351.007

⁸ Submission Point S351.008

⁹ Submission Point S351.009

¹⁰ Submission Point S351.010

that the mapping already undertaken by the Northland Regional Council should be relied upon.

16. With respect to the Transpower submission seeking critical infrastructure be provided for within the CEZ, I agree with the approach that these matters are best dealt with through the relevant district wide chapter, in this case the Infrastructure Chapter.
17. Regarding the submission of Fire & Emergency New Zealand [**FENZ**], I agree that these matters have been dealt with at previous hearings and are already otherwise provided in relevant district wide chapters.
18. Overall, I agree with the recommendations reached by the s42A report writer.

Key Issue 2: Objectives

19. I agree with the changes proposed to the Objectives, Overview and Notes sections in the CEZ chapter.
20. I agree with the changes to CAR-O2 insofar that they provide more appropriate terminology.
21. The changes to the Overview and Notes clarify the well-established approach that Zone and District Wide chapters are to be considered together where the underlying Zone does not deal with the specific matter.

Key Issue 3: Policies

22. I agree with the changes proposed to the Policies within the CEZ chapter. They better reflect standard terminology used in other Chapters and it is logical to extend that wording to the CEZ.

Key Issue 4: Rules

23. In my view the fundamental purpose of the CEZ is to implement the Development Plan and Schedule, which has its genesis in approved resource consents.
24. To apply generic district wide rules to key operational components like earthworks, vegetation clearance, traffic, parking and access contradicts the core purpose of the resource consent sought for the development. It potentially creates inconsistency with the approved resource consents and undermines the certainty of development that the Special Zone is intended to provide.
25. While the Council's intention to adhere to the National Policy Statement for Urban Development (NPS-UD) is understood, its application to the CEZ is questionable. Deleting the parking requirements detailed in Table 1 would be inconsistent with the zone's primary objective.

26. The proposed primary objective for the zone is **CAR-O1**, which states that development should be "undertaken in general accordance with the approved Carrington Estate Development Plan and Schedule".
27. The parking schedule in Table 1 is not an arbitrary provision; it is an integral part of that approved plan. Removing it directly conflicts with the objective of developing the estate as it was consented. The rule wasn't just a minimum requirement; it was a directive that parking "*shall be provided in accordance with*" the specific, consented plan.
28. The NPS-UD's policy on removing parking minimums is aimed at typical urban environments to improve housing affordability and encourage public transport. Carrington Estate is a self-contained, destination resort with visitor accommodation and recreational facilities in a rural setting. Its function relies on visitors arriving by private vehicle. Adequate, well-designed parking is essential for the operational success and high amenity of the estate. Removing the planned schedule could lead to poorly managed, ad-hoc parking that detracts from the visitor experience and the character the zone is meant to protect.
29. For a large-scale visitor and accommodation facility, certainty around operational components is crucial. Table 1 provides this certainty. The s42A report writers contention that its deletion "does not prevent CEJ from providing carparking" misses the point that the table was part of a holistic plan that determined the *appropriate* amount and location of parking needed for the approved activities to function without adverse effects. The same conclusions can be reached for access, internal roading, and loading spaces.
30. On that basis, I do not agree with deleting the parking items from the Development Plan and Schedule.
31. Similarly, the argument to replace the specific earthworks rule with generic district-wide provisions fails to recognize the unique status of the Carrington Estate development.
32. The proposed policy **CAR-P1** is to "*Enable land use and subdivision that is in general accordance with the approved Carrington Estate Development Plan and Schedule*". The original rule (18.6.6.1.11) was specifically designed to enable the earthworks necessary to construct the approved golf course, buildings, and infrastructure as laid out in the development plan. Replacing this bespoke permission with new, generic district-wide rules could create significant and inappropriate hurdles, effectively *disabling* rather than enabling the development to be completed as consented.
33. The effects of earthworks and vegetation clearance for Carrington Estate were already assessed by the council in a holistic manner when the original resource consents were granted. This assessment would have balanced the effects against the comprehensive mitigation measures of the entire project, such as landscaping, open space retention, and the creation of a high-quality visitor destination. Applying generic district-wide rules

now would assess these activities in isolation, divorced from the context of the integrated development they are intended to serve.

34. Retaining the intent of Rule 18.6.6.1.11 and restating these as new rules within the relevant District Wide chapter ensures that the necessary works for the consented development can proceed under the framework and conditions originally deemed appropriate by the council, providing consistency and certainty in line with objective **CAR-O1**.
35. I support the changes proposed in terms of CAR-RX Farming and CAR-S2 for the same reasons outlined in the s42A Report.

PROPOSED PROVISIONS

36. In light of the above, the following draft provisions are provided below.

TRAN-RX	Transport [including parking, access and loading]	
Carrington Estate zone	<p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1 Transport, including access, internal roading, parking, and loading spaces, are provided in general accordance with the approved Carrington Estate Development Plan and Schedule.</p>	<p>Activity status where compliance not achieved with PER-1:</p> <p>Restricted Discretionary</p> <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> a. The safe and efficient functioning of the transport network, including vehicle circulation and pedestrian safety. b. The amenity effects of parking and loading areas, including visual appearance and landscaping. c. Consistency with the overall design, character, and operational needs of the resort development.
IB-RX	Vegetation clearance	

Carrington Estate zone	Activity status: Permitted Where: PER-1 Vegetation clearance is undertaken in general accordance with the approved Carrington Estate Development Plan and Schedule	Activity status where compliance not achieved with PER-1: Restricted Discretionary Matters of discretion are restricted to: <ul style="list-style-type: none"> a. Effects on visual amenity and the natural character of the environment. b. Effects on indigenous vegetation, habitats, and biodiversity. c. The effectiveness of any proposed mitigation measures.
EW-RX	Earthworks	
Carrington Estate zone	Activity status: Permitted Where: PER-1 Earthworks are undertaken in general accordance with the approved Carrington Estate Development Plan and Schedule	Activity status where compliance not achieved with PER-1: Restricted Discretionary Matters of discretion are restricted to: <ul style="list-style-type: none"> a. Effects on water quality and aquatic ecosystems. b. Effects on visual amenity and natural character. c. Effects on cultural and spiritual values.

37. A s32AA evaluation is provided following consideration of the rezoning submissions.

Key Issue 5: Rezoning

38. At this point in time CEJ is not providing further evidence on submission points 351.004, 351.005, and 351.006 in relation to rezoning.

SECTION 32AA EVALUATION

39. This evaluation recommends reinstating specific rules for transport and earthworks. It concludes this is the most appropriate way to achieve the plan's objectives, particularly Objective CAR-O1, by providing an effective, efficient, and certain regulatory framework to implement the approved Carrington Estate Development Plan and Schedule.
40. The proposed change reinstates Rule 18.6.6.1.7 of the operative Far North District Plan [although renamed] and the associated Table 1 from the Schedule, which requires transport and parking facilities to be provided in accordance with the approved Development Plan. The approach will provide for this in the Transportation chapter of the PDP.
41. Similarly, it is also proposed to reinstate the former Rule 18.6.6.1.11 of the operative Far North District Plan, which permits earthworks and vegetation clearance when undertaken in accordance with the approved Development Plan and the conditions of the original resource consents. Again, the approach will provide for this in the relevant District Wide chapter.

Effectiveness and Efficiency

Effectiveness:

42. Reinstating the rule is effective in achieving Objective CAR-O1 and Policy CAR-P1. These provisions seek to ensure the development proceeds in "general accordance with the approved Carrington Estate Development Plan and Schedule" and to enable that outcome.
43. The parking schedule is an integral part of the approved Carrington Estate Development Plan and Schedule, and its reinstatement directly implements this objective. Deferring to generic district-wide rules is less effective, as it fails to recognize the specific, integrated nature of the consented Carrington Estate resort.
44. The Carrington Estate Development Plan and Schedule, by its nature, requires significant and staged earthworks. A specific rule permitting these works subject to the original consent conditions is the most direct and effective way to "enable" the development. Deferring to generic district-wide rules is less effective as it introduces processes that may be unsuited to the project's scale and could fundamentally alter the approved design.

Efficiency:

45. This proposed approach is efficient as the assessment of appropriate parking levels and earthworks has already been completed during the original comprehensive consent process. Requiring a new consenting process under generic rules would be a duplication of effort, adding unnecessary time and cost for both the developer and the Council. Reinstating the rule is the most cost-effective method to achieve the desired outcome.

Costs and Benefits

Benefits:

46. Economic: Provides economic certainty and efficiency by leveraging the prior assessment, reducing consenting costs and delays, and enabling the project to proceed as planned. This supports the economic and employment benefits of the established tourism facility at Carrington Estate.
47. Environmental: Ensures parking is provided in a planned, consolidated manner as originally designed, protecting the high-amenity, landscaped character of Carrington Estate from the negative effects of ad-hoc or insufficient parking.
48. Social & Administrative: Provides clarity for the project's ongoing implementation and reduces the administrative burden on Council by avoiding redundant consent applications.

Costs:

49. The administrative cost of reinstating these bespoke rules subject to the original resource consent is negligible. There are no significant environmental or economic costs to reinstating the rule, as the management of effects is already provided for in the existing consents. The only perceived cost is not applying the very latest district-wide rules, but the existing consent conditions remain an appropriate and legally binding management tool.
50. The perceived cost is creating an exception to the district-wide approach to the NPS-UD. However, this is not a true cost but rather the intended function of a Special Zone designed to manage a unique, pre-approved development.

Risk of Acting or Not Acting

Risk of Acting (Reinstating the rules):

51. The risk is a perceived inconsistency with the NPS-UD. This risk is low, as a strong argument can be made that the NPS-UD's policy drivers are aimed at typical urban environments and do not readily apply to a self-contained, rural destination resort where ensuring adequate parking is a primary tool for managing amenity.

Risk of Not Acting (Allowing the rule's deletion):

52. Economic Risk: A significant risk of project delays and increased costs that could threaten the viability of completing the development as consented and designed. This could also result in a partially developed, under-utilised site, failing to deliver the anticipated economic and social benefits.
53. Environmental Risk: There is a risk of degraded environmental and amenity outcomes if parking is not managed according to the integrated plan, potentially leading to vehicles parked on sensitive landscaped areas.

54. Planning Risk: Creates an internally inconsistent plan where the primary objective (CAR-O1) is to follow the Development Plan, but a key rule to enable this is absent. There is also a risk of unnecessary administrative load on Council staff, who would be required to process new and complex applications for works that have already been previously approved.

CONCLUSION

55. In my opinion, the creation of the CEZ in the Proposed Far North District Plan is intended to provide a clear and certain pathway for the implementation of the long-standing and approved Carrington Estate Development Plan and Schedule.
56. While I concur with the s42A report writer's recommendations on general matters, objectives, and policies, I disagree with the recommendation to delete key operative rules and replace them with generic district-wide provisions.
57. The core purpose of the CEZ is to enable the development to proceed as it was consented, in line with Objective CAR-O1 and Policy CAR-P1. The proposed deletion of the specific rules for transport, parking, access, earthworks, and vegetation clearance fundamentally undermines this purpose.
58. These bespoke rules were not arbitrary; they were integral components of a comprehensive resource consent approval where the environmental effects were assessed holistically. Applying generic district-wide rules now would create inconsistency, uncertainty, and significant economic and administrative inefficiency by forcing a re-evaluation of matters already decided.
59. As detailed in the s32AA evaluation, reinstating the original, specific rules in the relevant District Wide chapters, that links back to the CEZ is the most effective, efficient, and appropriate method to achieve the objectives of the plan.
60. This approach provides essential certainty for the ongoing development of this significant tourism facility, avoids the unnecessary costs and delays of duplicative consenting processes, and ensures the high-amenity and environmental outcomes envisioned in the original consent are realised.
61. Therefore, I recommend that the Hearings Commissioners reject the s42A report's recommendations on these specific matters and instead retain the bespoke rules for transport (including parking and access) and earthworks within the relevant District Wide chapters, as these are essential to give effect to the approved Development Plan.