



Date: 30/07/2025

To: Melissa Pearson
Principal Consultant
SLR

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Market Economics

FAR NORTH DISTRICT PLAN REVIEW – RURAL ZONE

The Far North District Council (FNDC) is currently considering a range of rural rezoning submissions as part of Hearing 15C of the Proposed District Plan (PDP) process. Many of these submissions seek a change in zoning from Rural Production to more enabling rural zones such as Rural Lifestyle, Rural Residential, or Settlement, primarily to allow for additional subdivision and residential development.

This memo has been prepared to inform Council's decision-making by providing an evidence-based assessment of whether the rural provisions in the PDP are sufficient to meet anticipated rural housing demand. The analysis draws on the findings and modelling capability associated with the 2024 Housing and Business Development Capacity Assessment (HBA). The base data includes demand and capacity modelling across urban and non-urban areas, as well as historic building consent data, which offers insight into development trends on the ground.

The objectives of this memo are to:

- Evaluate whether the PDP's existing rural zoning framework provides sufficient capacity to accommodate projected household growth in rural areas;
- Assess the impacts of Council's recommended subdivision provisions on rural development capacity; and
- Provide a targeted assessment of rural residential demand and capacity, drawing on HBA 2024 modelling and parcel-level rezoning requests to inform the assessment of rezoning requests under Hearing 15C.

By bringing together modelled demand and plan-enabled capacity, this memo offers a robust basis for determining the need for additional rural rezoning (i.e., capacity).

The memo starts by providing a high level summary of demand for residential options in the rural areas before dealing with the capacity.

1 Rural Capacity vs Demand – HBA 2024

While the Far North was not considered a Tier 3 urban environment when the PDP was notified, we understand that this status has since changed. As a Tier 3 council, FNDC is not required to complete a detailed HBA or apply competitiveness margins when evaluating development capacity. However, recognising the value of an



evidence-informed approach to growth management, FNDC commissioned a voluntary HBA in 2024. The findings of the HBA have informed a range of workstreams, including the PDP, Kerikeri-Waipapa Spatial Plan (process), and responses to growth-related submissions.

The 2024 HBA followed the general structure set out in the NPS-UD but was tailored to the Far North context. Given the district's predominantly rural character, the assessment extended beyond traditional urban centres to include rural settlements and non-urban areas but the focus remained on the urban areas. The assessment combined both demand- and supply-side components. Housing demand was derived using a combination of population and household projections sourced from M.E's modelling, Stats NZ and Infometrics. These were then refined through Market Economics' proprietary Housing Demand Model, which incorporated variables such as household type and size, age structure, tenure preferences, income levels, and dwelling type preferences. The resulting demand estimates assumed a one-to-one relationship between households and dwellings, allowing the model to project future housing demand over the short (2023–2026), medium (2026–2033), and long term (2033–2053).

On the supply side, the model estimated plan-enabled capacity (PEC) by applying the relevant planning rules—including minimum lot sizes and development controls—to each relevant parcel in the district. This provided a theoretical maximum number of dwellings that could be developed under the District Plans (i.e., the Operative District Plan and the Proposed District Plan). These PEC figures were then filtered through a commercial feasibility model, which assessed development viability based on cost and price assumptions, including a required developer margin of 20 percent. This filtering resulted in a feasible capacity (FC) figure representing development opportunities likely to be commercially realised. The final step was estimating potential development capacity (PDC)¹, which accounted for market uptake in the local context, considering affordability constraints, typology preferences, and the location of capacity relative to demand.

While the primary focus of the 2024 Housing and Business Development Capacity Assessment (HBA) was on urban areas—particularly Kerikeri–Waipapa—it also provides some useful insight into the rural environment. This memo draws on that information to examine whether the current provisions in the PDP are sufficient to meet anticipated rural housing demand. The following subsections outline projected rural housing demand, assess the PEC available under the PDP to accommodate this growth, and evaluate the sufficiency of that capacity.

1.1 Rural Demand

The HBA 2024 projects that the number of households in the Far North District will increase by approximately 7,255 over the next 30 years. This growth is reported occur across three time periods: 1,195 additional households between 2023 and 2026 (short term), 2,445 between 2026 and 2033 (medium term), and 3,615 between 2033 and 2053 (long term).

In terms of typology, demand is expected to remain concentrated in detached dwellings, which reflects longstanding settlement patterns in the district and aligns with national trends in comparable rural and semi-

¹ The PDC is slightly different from reasonably expected to be realised (RER) capacity, in that household demand patterns form a key driver for PDC. RER is largely driven by assumed uptake rates based on historic patterns. PDC applies refined assumptions, methodological advances, expectations about the future to estimate the likelihood of capacity being developed.



rural areas. Across all three projection periods, the model estimates a ratio of 0.11–0.12 attached dwellings for every 1 detached dwelling, reinforcing that the dominant form of housing will continue to be stand-alone homes.

To distribute this projected demand spatially, the HBA used historic residential building consent data from 1991 to 2023 as a proxy for spatial/market attractiveness and development trends to frame the assumptions. The model allocates demand as follows: Kerikeri–Waipapa accounts for 45%, with Kaitia and Kaikohe each receiving 2.5%, other settlements 30%, and rural areas 20%. The extent of these areas² is provided in Appendix 1³.

This spatial breakdown, as shown in Table 1, indicates that rural areas are expected to accommodate approximately 1,451 additional households over the 30-year period. This includes 239 households in the short term (2023–2026), 489 in the medium term (2026–2033), and 723 in the long term (2033–2053). Similarly, other settlements, referring to smaller towns and villages outside the main urban centres, are projected to accommodate around 2,177 additional households over the same period. This is made up of 358 households in the short term, 734 in the medium term, and 1,085 in the long term. Combined, rural areas and smaller settlements are expected to absorb **approximately 3,628 new households**.

Table 1: Projected Household Growth by Area Type and Timeframe (2023–2053)

Household Growth	2023-26	2026-33	2033-53	2023-53
Other Settlements	358	734	1,085	2,177
Rural	239	489	723	1,451
Total	597	1,223	1,808	3,628

It is important to note that while Tier 1 and Tier 2 councils under the NPS-UD are required to apply competitiveness margins to these projections (i.e. 20% in the short and medium term, and 15% in the long term), this requirement does not apply to Tier 3 councils such as the Far North District. This analysis does not apply an uplift margin to rural demand in its capacity calculations. Nonetheless, the demand figures represent a robust baseline for assessing the adequacy of plan-enabled capacity under the Proposed District Plan. The margin is however applied separately to ensure that a robust approach is taken (see Table 2).

Table 2: Projected Household Growth with margin by Area Type and Timeframe (2023–2053)

Household Growth	2023-26	2026-33	2033-53	2023-53
Other Settlements	430	880	1,246	2,556
Rural	287	587	831	1,705
Total	717	1,467	2,077	4,261

² Note that these geographic boundaries do not necessarily align with zoning boundaries of the Proposed District Plan. For example, a portion of the Horticulture zone has been included within the Kerikeri–Waipapa spatial area, even though much of that land is rural in character. This reflects the modelling approach of capturing functional and market-based catchments rather than strict planning zones.

³ Importantly, the ‘other settlements’-term was used during the HBA process and is not related to the ‘settlement zone’.



1.2 Plan-Enabled Capacity & Sufficiency (Rural Areas & Other Settlements)

Plan-enabled capacity (PEC) represents the total number of additional dwellings that could theoretically be developed under the PDP, based on current planning rules such as minimum lot sizes and development rules. It does not account for commercial viability, infrastructure constraints, physical limitations, or actual development intent. PEC is the starting point of the sufficiency assessment and provides a useful upper-bound estimate of what the plan technically allows.

Across the district, the PDP provides for an estimated 39,395 additional dwellings district wide, made up of 11,203 detached dwellings and 28,192 attached dwellings (see Table 3). Attached dwelling capacity is distributed across a range of locations, including both larger urban centres, as well as smaller towns and settlements. This reflects the PDP's intention to support a variety of housing forms across the district, while enabling more growth in places with existing or planned infrastructure. This is also consistent with the requirements of the NPS-UD.

Table 3: Plan-Enabled Dwelling Capacity under the PDP, by Area

Area	Detached	Attached	Total
Other Settlements	4,909	17,690	22,599
Rural	3,448	572	4,020
District Wide	11,203	28,192	39,395

Focusing on rural areas, the PDP enables approximately 3,448 detached dwellings and 572 attached dwellings, providing a total rural PEC 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. Even with the margin applied, rural capacity exceeds expected demand by more than 2.3 times, indicating that significant headroom already exists to accommodate rural growth.

Similarly, in other settlements, which are typically smaller towns and villages outside the main urban centres (as well as some non-urban zoned land around the townships), the PDP enables approximately 4,909 detached dwellings and 17,690 attached dwellings, totalling 22,599 dwellings. This compares to a projected demand of 2,177 households, or 2,556 households with the margin applied. This represents nearly nine times the anticipated demand, reinforcing that the PDP provides ample capacity to accommodate growth in these areas without requiring further rezoning.

The substantial surplus of PEC in both rural areas and other settlements demonstrates that additional rezonings are not required to meet anticipated demand. The PDP already enables more than sufficient development potential across rural and settlement areas, supporting a managed and sustainable approach to accommodating growth.



1.3 Implications of Council's Hearing 15C Recommendations

As part of the PDP hearings process, the reporting officer for Hearing 9 – Rural has recommended amendments to subdivision provisions across several rural zones in response to submissions. The key recommendations are summarised below:

- Rural Production: 40ha controlled, 8ha discretionary (no change from notified)
- Horticulture Precinct: 8ha discretionary, no controlled pathway (notified in the Horticulture Zone as 10ha controlled, 4ha discretionary)
- Rural Lifestyle: 2ha controlled, 1ha discretionary (notified as 4ha controlled, 2ha discretionary)
- Rural Residential: 4,000m² controlled, 2,000m² discretionary (no change from notified)
- Settlement: 3,000m² controlled, 1,500m² discretionary (no change from notified)

The recommended changes to the Horticulture Precinct and Rural Lifestyle zones (see Table 4) are of particular relevance to this assessment. As part of the HBA modelling, only the controlled subdivision pathways were included in the capacity calculations. Under Council's updated provisions, the removal of the 10 ha controlled pathway in the Horticulture Precinct means subdivision is now only possible via a more stringent 8 ha discretionary pathway, likely reducing development certainty and feasibility in that zone. Conversely, the Rural Lifestyle zone becomes more enabling, with the controlled minimum lot size reduced from 4 ha to 2 ha, allowing for increased density and more efficient use of land already zoned for lifestyle development.

Table 4: Subdivision Provision- PDP vs Council Recommendation - Controlled Pathway only

Zone Name	PDP Provision Controlled	Recommended Provision
Rural Production	40 ha	40 ha
Horticulture Precinct	10 ha	N/A
Rural Lifestyle	4 ha	2 ha
Rural Residential	4,000 m ²	4,000 m ²
Settlement	3,000 m ²	3,000 m ²

These changes have important implications for PEC with the shift in PEC summarised in Table 5. Applying the recommended subdivision provisions for the Horticulture Precinct and Rural Lifestyle zones results in a net increase of 117 detached dwellings, lifting total PEC_Detached across the district from 11,203 to 11,320 dwellings, a modest overall increase of 1%. While the district-wide uplift is relatively minor, the changes represent a significant increase in development potential within the affected zones. Specifically, PEC in the Rural Lifestyle zone increases by 200%, from 94 to 282 dwellings. In contrast, the removal of the 10 ha controlled pathway in the Horticulture Precinct eliminates its previously modelled capacity, reducing PEC in that zone from 71 to zero. These shifts reflect a more targeted and efficient planning approach, enabling greater rural capacity where lifestyle demand is strongest, while tightening controls in productive rural areas. It is important to note that the recommended provisions have no impact on PEC_Attached due to the rural nature of the zones affected.



Table 5: Change in Detached PEC* from Recommended Subdivision Provisions- Controlled Pathway

Zone Name	PEC Detached		Change	% Change
	PDP	Recommended provision		
General Residential	6,292	6,292	0	-
Horticulture	71	-	-71	-100%
Kororāreka Russell Township	189	189	0	-
Rural Lifestyle	94	282	188	200%
Rural Production	1,866	1,866	0	-
Rural Residential	2,397	2,397	0	-
Settlement	294	294	0	-
Total	11,203	11,320	117	1%

*The changes in recommend provisions have no impact on PEC_Attached due to their rural nature.

This targeted uplift reflects a more efficient use of land, enabling greater housing choice within the existing rural zoning footprint without expanding the area available for development. All other zones remain unchanged, reinforcing the fact that the uplift is a policy-driven, localised adjustment rather than a broad expansion of development capacity.

Although the existing PEC already exceeds projected rural and settlement demand by a wide margin, the recommended subdivision changes further strengthen the PDP's capacity to accommodate growth, particularly within the Rural Lifestyle Zone. This enhances the plan's efficiency and resilience without requiring any additional rural rezoning.

Rezoning additional rural land typically incurs significant costs. These include the loss of versatile soils, the fragmentation of productive land, and adverse impacts on rural character and landscape values. Increased rural subdivision can also place greater pressure on transport networks, particularly where lifestyle development intensifies in areas with limited roading capacity. In contrast, accommodating growth within the existing rural zoning framework, particularly in zones already intended for lifestyle development, promotes more efficient and sustainable land use, while still providing flexibility and housing choice for rural communities.

In this context, Council's Hearing 9 and 15C recommendations (being the combination of amendments to subdivision provisions and rezoning recommendations) represent a strategically efficient and balanced planning response. They align with the findings of the HBA, the broader intent of the PDP by enabling capacity uplift where it is already anticipated, and the NPS-UD. This ensures rural growth is coordinated, cost-effective, and responsive to long-term demand, without undermining rural character or placing unnecessary strain on Council resources.



2 Rural Zoning Submissions

As part of the PDP process, Council received a substantial number of submissions requesting changes to the zoning of rural land. These submissions generally seek rezoning to a more enabling rural zone, primarily to enable additional subdivision and rural lifestyle development opportunities.

Summarising these submissions is challenging due to (often) vagueness and complexity. Individual submitters may provide feedback on multiple land parcels, and different submitters may comment on the same parcel, often expressing similar but occasionally differing views.

To help provide a clearer picture of the implications of the relief sought, the implied changes and the impact on the PEC are estimated. The analysis includes only a subset of submissions, specifically, those land parcels that:

- Are currently zoned under one of the rural-related zones in the notified PDP; and
- Have been included by submitter(s) who are seeking an alternative rural zoning.

Where multiple zoning outcomes were requested, the analysis adopts the most commonly sought zoning as the final requested outcome for that parcel. As shown in Table 6, a total of 1,311 rural parcels were identified, spanning four PDP rural zones and covering approximately 5,154 ha.

Table 6: Number and Area of Rural-Zoned Parcels with Rezoning Submissions

PDP Zone	Parcel Count	Total Area (ha)
Horticulture	495	1,303
Rural Lifestyle	264	595
Rural Production	547	3,225
Rural Residential	5	31
Total	1,311	5,154

Most of the area (63%) is zoned Rural Production, accounting for 3,225 ha across 547 parcels, the largest share by both area and parcel count. The Horticulture zone contains 495 parcels (38% of the total), but represents only 25% of land area. Together, the Rural Lifestyle and Rural Residential zones comprise 269 parcels, or 21% of the total, but only 12% of rural land area, reflecting their smaller lot sizes and more intensive development pattern.

Table 7 summarises the alternative rural zoning outcomes requested through submissions, based on the notified PDP zoning. It shows the percentage of land parcels where submitters sought a change to a specific alternative rural zone. The results demonstrate a preference for upzoning to more enabling rural-related zones, particularly Rural Residential. For example:

- 99% of parcels zoned Rural Lifestyle requested rezoning to Rural Residential;
- 70% of parcels zoned Rural Production sought the same change; and
- 65% of parcels zoned Horticulture were proposed for rezoning to Rural Residential.



Table 7: Summary of Requested Zoning Outcomes for Rural Parcels by existing PDP zoning

New Zone Requested	PDP Zone Notified			
	Horticulture	Rural Lifestyle	Rural Production	Rural Residential
Horticulture	-	0%	0%	0%
Rural Lifestyle	0%	-	24%	80%
Rural Production	35%	0%	-	20%
Rural Residential	65%	99%	70%	-
Settlement	0%	<1%	6%	0%
Total	100%	100%	100%	100%

While a number of submissions sought rezoning from Rural Residential to General Residential, these have not been included in this analysis, as this analysis focuses solely on alternative rural zoning requests.

To understand the potential scale of rural rezoning sought through submissions, the PEC model was modified to reflect the requested zoning changes, using the subdivision provisions recommended in Hearing 15C as the benchmark. This process provides an estimate of how many additional dwellings could theoretically be enabled if rezoning requests were granted across all affected parcels.

Table 8: Estimated Change in PEC if all Rural Rezoning Requests are adopted

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%
Total	11,320	14,661	3,341	30%

*Rural rezoning requests have no impact on PEC_Attached due to their rural nature.

The results (Table 8) show that 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, reflecting both the high volume of requests for this zone and its relatively enabling subdivision provisions. The Rural Lifestyle zone also experiences a significant uplift, increasing by 168 dwellings (a 60% increase), driven primarily by rezoning requests from land currently zoned Rural Production. The Settlement zone gains an additional 118 dwellings (+40%), while a minor reduction occurs in the Rural Production zone (–5 dwellings). Capacity in the Horticulture zone is effectively removed due to the stricter provisions and rezoning out of that zone, and no change is observed in the General Residential or Kororāreka Russell Township zones. Importantly, these rural rezoning requests have no impact on attached dwelling PEC, as the receiving zones are rural in nature and not typically associated with higher-density housing typologies.



These results demonstrate that if all requested rezonings were adopted, there would be a significant increase in overall rural and fringe residential capacity, particularly through enabling more development in areas not previously identified for urban growth. However, as discussed earlier, the existing PDP provisions already provide ample capacity to accommodate projected rural demand. This raises concerns about potential over-zoning and highlights the importance of aligning zoning decisions with growth expectations and long-term land use strategy. The 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 (from an economic perspective) with significant trade-offs and the loss of valuable natural resources.

3 Concluding remarks

This memo has examined the capacity of the PDP to accommodate projected rural housing demand, drawing on the 2024 HBA and modelling of proposed rezoning requests under Hearing 15C.

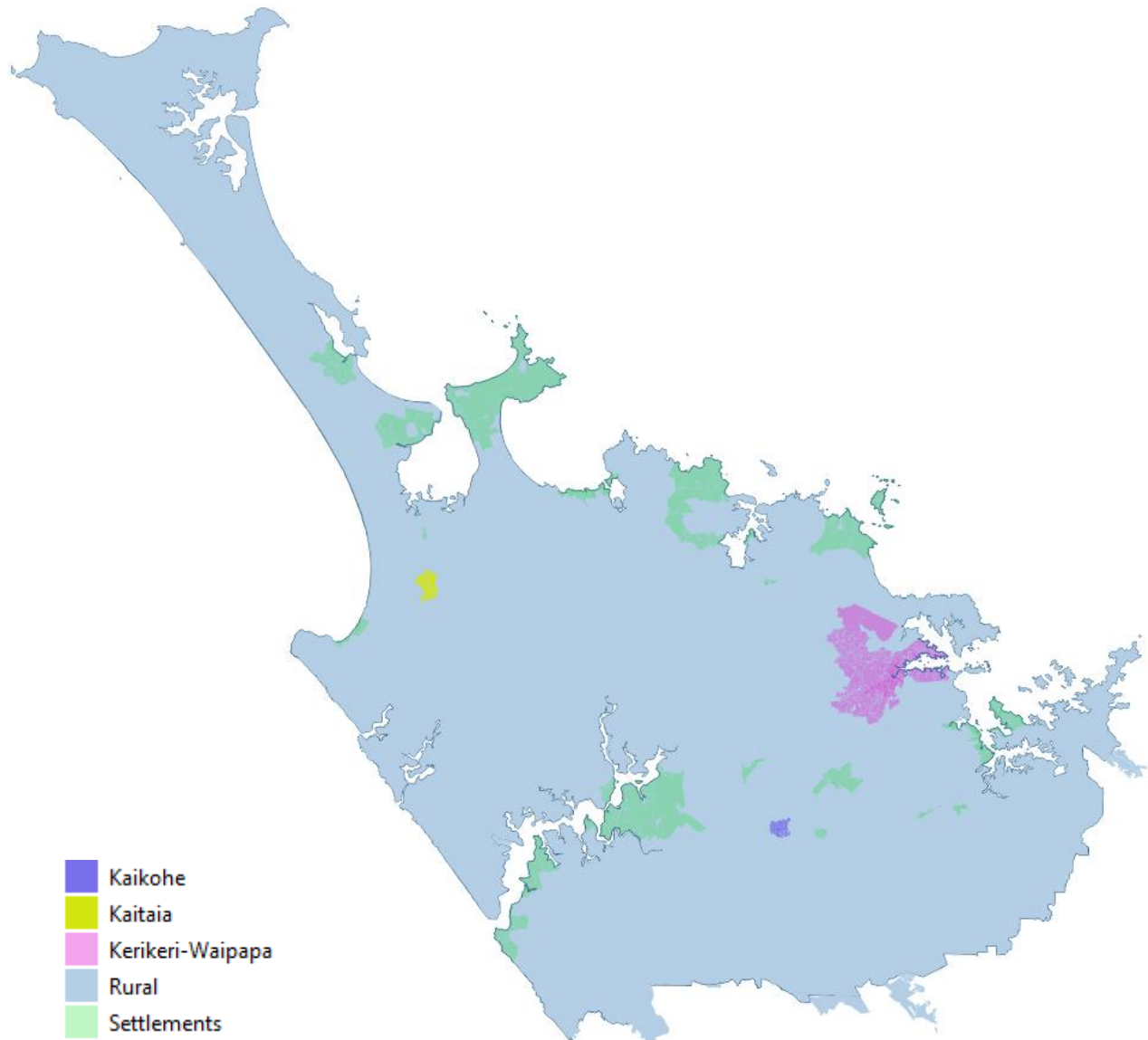
The analysis confirms that the PDP, as notified, already enables more than sufficient capacity to meet projected rural and settlement demand over the next 30 years. Even without accounting for recent recommendations to reduce minimum lot sizes in the Rural Lifestyle zone, rural plan-enabled capacity significantly exceeds expected growth. Moreover, Council's strategic refinement of subdivision provisions in the Rural Lifestyle zone further lifts capacity in areas where lifestyle demand is most concentrated, without the need to rezone additional land.

While submitters have requested rezoning from existing rural zones to more intensive rural categories, the evidence does not support a need for such changes. Upzoning broad areas of rural land risks undermining rural character and weakening alignment with growth strategy. In contrast, retaining the PDP's proposed zoning strikes an appropriate balance between flexibility, capacity, and long-term sustainability.

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. Strategic enablement should be supported through targeted application of the Rural Lifestyle zone where appropriate, rather than broad-scale rezoning. Council should also continue to monitor rural development patterns using building consent data and future capacity assessments to ensure planning provisions remain responsive to growth and infrastructure pressures over time.



Appendix 1 Spatial extent of Rural Areas and Other Settlements Used in HBA 2024



Memorandum



To Melissa Pearson
Principal Consultant - Planning, SLR

From Melean Absolum
Landscape Architect, MALtd

Date 2 July 2025

Dear Melissa,

SUBMISSIONS 551 - LUCKLAW FARM LTD, 552 - TRUSTEES OF TARANAKI TRUST & 553 - GRACE STURGESS

INTRODUCTION

This memorandum records my advice, prepared on behalf of Far North District Council (FNDC), in response to Submissions 551 from Lucklaw Farm Ltd, s552 from Trustees of Taranaki Trust and s553 from Grace Sturgess. All three submissions are seeking changes to the zoning of several properties at Rangiputa on the north-western end of the Karikari Peninsula, to enable both residential and urban development.

In preparing this memo I have considered the following documents:

- Submissions 551, 552 and 553;
- Evidence and appendices of Ms Gilbert, Ms Dixon and Mr Langman; and
- Proposed District Plan as notified (PDP).

As a result of time constraints, I have had to rely on a desk top review of the submissions and the evidence provided to support them. Although I have visited Rangiputa in the past, I have relied on Google Maps and Street View to supplement the graphic illustrations and photographs provided in the evidence.

BRIDGET GILBERT'S EVIDENCE AND APPENDICES

Ms Gilbert's evidence provides a very thorough landscape and natural character assessment of the various parcels of land identified in the plan referred to as Schedule 2 in the submissions, which is shown overleaf.

She also provides a number of photographs of the properties which illustrate the various aspects she reports on. Additionally she has prepared a Puwhewe Preliminary Spatial Strategy, (PPSS) prepared in conjunction with Earl Design, which illustrates the types of development that might occur in different parts of the subject land (hereinafter referred to as the site.)



The proposed zoning plan, Figure 3 in Schedule 2 in the submissions, seeking rezoning to:

- A** - Mixed Use Zone (MUZ) & General Residential (GRZ);
- B** - Rural Lifestyle, (RLZ);
- C** - Rural Production (RPROZ)

More specifically Ms Gilbert's evidence states that:¹

I understand that the fundamental landscape test in relation to a proposed rezoning relates to whether the rezoning proposal is appropriate from a landscape perspective. In more sensitive coastal locations such as the site and local area, this usually requires:

- a) the protection of and avoidance of adverse effects on the key landscape characteristics and values that contribute to the outstandingness of an RMA s6(b) type landscape;*
- b) the maintenance and enhancement of the key landscape characteristics and values that contribute to an RMA s7(c) type landscape;*
- c) the preservation, protection, and enhancement of the key landscape-related aspects of natural character in areas where RMA s6(a) is of relevance;*
- d) the avoidance of adverse effects on the key landscape-related aspects of natural character in areas of Outstanding Natural Character; and*
- e) the avoidance of significant adverse effects on the key landscape-related aspects of natural character in other areas of the coastal environment.*

In Appendix A to her evidence² she has mapped areas of the site identified as having high natural character, (HNC), outstanding natural character, (ONC), outstanding natural landscape values, (ONL) and outstanding natural features, (ONF), all of which are taken from the PDP maps. She also includes areas identified as SNA FN411 Puwheke Beach and Rotokawau Lakes, taken from the NRC GIS data.

¹ Evidence of Bridget Gilbert, dated 11 June 2025, paragraph 16, page 5

² Ibid, Appendix A, IX

Although not explicitly confirmed in her evidence, I deduce that the areas mapped are where Ms Gilbert has identified and recorded in her evidence:

- localised 'high' physical landscape values;
- 'moderate' to 'high' perceptual landscape values;
- 'high' associative landscape values;
- 'high' abiotic and biotic natural character values; and
- 'moderate' and 'high' experiential natural character values.

I understand from Ms Gilbert's evidence that she has tested the proposed rezoning of the site in collaboration with the 'project team' involving both a site visit and an iterative workshop process. She states:³

"This process has given me a sound understanding of the 'other expert' technical opportunities and constraints associated with the site and, in particular, the characteristics which have played an important role in shaping where certain types of development can and cannot be located on the site."

The result of this process is the Puwheke Preliminary Spatial Strategy (PPSS) illustrated in plan form on pages 3 and 4 of Appendix D to her evidence. The plan on page 3 shows a variety of development proposals including:

- a 1.4 ha MUZ at the intersection of Rangiputa Road and Motutara Drive;
- a 9.9 ha GRZ to the north and east of the MUZ;
- 35.7 ha of RLZ along the western edge of the site;
- 17.9 ha future Management Plan subdivision for RLZ under the RPROZ provisions to the north-east of the GRZ;
- 8.7 ha future Management Plan subdivision for coastal lifestyle development under the RPROZ provisions beside Puheke Road on the eastern side of the site;
- 3.2 ha for a lodge and visitor accommodation on the western headland;
- along with wetland and riparian area enhancements and various infrastructure and tourism activity developments.

Importantly, all the development proposals listed above are located outside any of the areas mapped with high landscape or natural character values or the SNA overlay, apart from a few small overlaps of the SNA with the proposed RLZ. This comparison can readily be seen in the plan on page 4 of Ms Gilbert's Appendix D.

My response to this is that, in principle, the PPSS could probably be implemented without creating significant adverse landscape and natural character effects. However, I understand that the submissions are seeking a much broader re-zoning pattern than is illustrated in the PPSS. A considerably larger area is sought to be zoned for a mixture of MUZ and GRZ than the 11.3 ha shown in the PPSS. Similarly, a much larger area is sought to be zoned RLZ than the 35.7 ha shown on the PPSS.

³ Evidence of Bridget Gilbert, dated 11 June 2025, paragraph 17, page 6

It may be that Ms Gilbert anticipated that the results of the iterative process involved in the preparation of the PPSS would continue, so that the re-zoning being sought in the submissions would be further refined to align with the PPSS. However, it is my understanding that the submissions as lodged remain what is being sought here.

As a result, my recommendation to the IHP is that, from a landscape perspective, the submissions should not be supported.

If, however, the submitters were to scale back the rezoning pattern they seek in their submissions, then some rezoning of the land identified in the PPSS for MUZ and GRZ may be appropriate, from a landscape perspective.



REGISTERED
LANDSCAPE
ARCHITECT

Melean
Dip LA
2 July

Absolum
FNZILA
2025

To: Melissa Pearson – Principal
Consultant - Consulting Planner on
behalf of Far North District Council

From: Elizabeth Morrison

Company: SLR Consulting Ltd

SLR Consulting New Zealand Limited

cc:

Date: 4 August 2025

Project No. 810.031487.00002

**RE: Proposed Far North District Plan – Submission 551 – Lucklaw Farm
Ecology Review**

Confidentiality

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SLR Consulting Ltd was engaged to review the submission of Lucklaw Farm Limited (submission 551) regarding their proposed rezoning request for the proposed Far North District Plan. This memo provides an ecology review of Submission 551 from Lucklaw Farm Ltd, which seeks changes to the zoning of specified properties in Rangiputa on the Karikari Peninsula. The submission seeks a change from the current Rural Production zoning to a combination of residential, mixed use and rural lifestyle zoning to the west while retaining Rural Production zoning for the balance of the site.

I have reviewed Submission 551 and the evidence of Ms Gilbert¹, Ms Dixon² and Mr Blythe³ as they relate to the ecology of the area. This review is based on a desktop review of the submitted information. Photographs appended to Ms Gilbert's evidence clearly illustrate the site landscape and ecological values as referred to in Ms Gilbert's and Ms Dixon's evidence.

The evidence includes a proposed zoning plan, provided alongside a preliminary spatial strategy (PSS) which provides a concept of how the site may be developed.

Review of Ecology Evidence

Ecological values

Ms Dixon has prepared a comprehensive summary of the ecological values of the site as part of her evidence. It clearly describes the areas of ecological value and potential threats to these alongside risks and opportunities as they relate to the proposed zoning and development.

Puwheke Beach forms the northern site margin and the Rotokawau Lakes are located to the centre and east of the site, surrounded by an area proposed to remain as Rural Production Zone. Ecological features of the site are located within areas identified as Outstanding Natural Landscape, Outstanding Natural Character and/or Significant Natural Area. The site contains a range of habitats, intact ecological sequences from coastal to freshwater systems, threatened species, heathland and wetlands. It also has high habitat values for threatened and at-risk species. The site has been identified as having very high ecological value.

¹ Statement of Evidence of Bridget Mary Gilbert (Landscape) dated 11 June 2025 and appendices A, B, C and D

² Statement of Evidence of Melanie Robyn Dixon (Ecology) dated 11 June 2025

³ Statement of Evidence of James Mitchell Blyth (Hydrology and Water Quality) dated 9 June 2011

Proposed zoning and development

The areas proposed for rezoning are located on the western slopes of the site but the PSS, which was prepared based on advice of the project team experts, does not align with the requested areas of rezoning. It appears the PSS was developed subsequent to original submission that specified the areas to be rezoned and considered advice from the project team experts to protect overall values of the site (particularly landscape, ecological, water quality). The PPS directs development to specific areas in line with a proposed recreational tourism development for areas of the site, however this does not align with the broad areas identified for Rural Lifestyle, General Residential and Mixed Use zoning. For example, there are areas that will be rezoned Rural Lifestyle where the PPS indicates that development should not occur due to environmental values of the site (e.g. around heathland). There are also areas to remain in the Rural Production zone where coastal/rural lifestyle development is shown in the PSS.

Potential risks from the development are identified in Ms Dixon's evidence, and include indigenous vegetation loss, water quality impacts, increase in pest plants, wildlife impacts from pets and wildlife disturbance from human presence.

The ecological evidence notes that most impacted vegetation will be pasture or exotic species. Vegetation removal may also be required for various tracks that will likely be required for access through the wider site. Vegetation removal near valuable heathland ecosystems may be required as part of the mountain bike and zipline track recreational area development with further survey and management required to refine the final alignment of infrastructure to reduce ecological impacts. Development, including that in the future development area to remain as Rural Production Zone, is identified in specific locations to avoid 'core' ecological areas. It is noted however that the ecological evidence is based on the assumption that development will align with the PSS rather than the proposed zoning plan.

Human disturbance to sensitive wildlife is associated with recreational activities, from proposed tourism development in the large balance of the site, such as mountain biking, ziplining and glamping.

Proposed and recommended ecological enhancement and management

The ecological evidence and PPS depict and describe areas of ecological enhancement and management.

Areas of proposed riparian and wetland enhancements have been identified in the PSS. Targeted ecological enhancement in the proposed glamping area and for wetland enhancement is anticipated. The evidence indicates that proposed riparian planting will be 30 metres or more in width along waterways in the area to the southwest of Lake Rotokawau in the proposed mixed and residential zone areas.

Heathlands have the highest management needs of the ecological features of the site. A specific management plan has been recommended by Ms Dixon for this area. She also notes that some areas are likely to be wetland, and extra protection will thus be required for part of the heathland area on the site.

Animal and plant pest management needs for the site are high and it has been indicated that these can be incorporated into the redevelopment and tourism operation proposed for the site.

Ms Dixon's evidence recommends that all development areas apart from mixed and residential zoning should have restrictions on pet ownership to protect threatened species from the risk of predation or disturbance from pets.



Other – Water quality

In addition, based on the evidence of Mr Blythe, Lake Rotokawau will be susceptible to potential impacts of development as the soils of the site have limited permeability and most of the overland flow paths drain towards this lake. There is the risk of sedimentation impacting the lakes, along with stormwater contamination and nutrients unless appropriate design and construction controls are put in place. Water sensitive design is required to ensure that development does not adversely impact the water quality values of the site and receiving waterbodies. Best practice wastewater management and adherence to erosion and sediment control plans will also be necessary for the site.

A change from grazing to residential and lifestyle should reduce nutrient level discharges to the receiving waterbodies.

Mr Blythe's evidence also recommends a catchment management plan for the local area.

Discussion

The ecology evidence identifies several ecological features that should be protected, alongside enhancement and specific restoration, as part of any potential future development of the site. I support these recommendations. These have been shown in the PSS plan for the site.

It is noted that the PSS does not fully align with the proposed requests for rezoning. While the proposed zoning is confined to the western area of the site, the PSS shows areas of rural lifestyle development extending closer to southwest of Lake Rotokawau and also along the eastern property boundary. It is however noted these areas would be developed under the Rural Production Zone provisions. The area proposed to rezone as Rural Lifestyle is shown in the PSS as containing an area for mountain biking and ziplining to avoid high value heathland in part of this area but there is no guarantee as part of the rezoning request that this area would not be developed for rural lifestyle purposes.

With the rezoning area being much larger than indicated in the PSS, the ecological impacts, particularly for heathlands, would be much greater than has been assessed within the landscape and ecology evidence. Indicative areas for ecological protection and enhancement should be integrated into the proposed rezoning plan and the zoning aligned to avoid high value ecological areas of the site. Based on the current proposed zoning plan there is the risk that these indicative ecological protection areas may not be carried over to future development proposals. As such, without the ecological recommendations being integrated into the rezoning request, the proposed rezoning of the subject site cannot be supported. Should a revised zoning plan with associated rules be provided that incorporated recommendations from the PSS and Ms Dixon's evidence, the proposed zoning may be able to be supported, but this would require further review.

Regards,

SLR Consulting New Zealand Limited



Elizabeth Morrison
Principal Ecologist



Hearing 15C - Rezoning General - Urban and Rural

Transport review

Prepared for	Far North District Council
Project number	FNDC-J014
Revision	C
Issue date	29 August 2025
Prepared by	Mat Collins, Associate Transportation Engineer

1. Introduction

My full name is Mathew (Mat) Ross Collins. I am an Associate Transport Planner at Abley Limited. I have been in this position since September 2023. I hold a Bachelor of Engineering (Hons) from the University of Auckland and have a post-graduate certificate in transportation and land use planning from Simon Fraser University in Vancouver, Canada.

I have ten years of experience as a transportation planner and engineer in public and private sector land development projects, which includes experience preparing assessments and reviewing transport aspects for master plans, District Plan Reviews, Plan Changes, large scale land use and subdivision resource consents, Notices of Requirement, and Outline Plans of Work.

I have been asked to provide evidence on transport matters relating to rural rezoning submissions, to support the evaluation report prepared under s42A of the RMA for Hearing 15C. I have been working with the Far North District Council (Council) on the Proposed District Plan (PDP) since September 2024, and Hearing 15C since March 2025.

I have read and am familiar with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. I have complied with the Code of Conduct in preparing my evidence and will continue to comply with it while giving oral evidence before the Independent Hearings Panel. I confirm that my evidence is within my area of expertise except where I state that I am relying on the evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in my evidence

The purpose of this technical note is to provide my review of transport matters relating to the various submissions on the PDP seeking rezoning in rural areas, being assessed through Hearing 15C.

I have reviewed the submitter information set out below. None of the submitters have provided evidence from a transport expert. My evidence therefore addresses broad transport effects of dispersed rural development patterns and, where requested by Council's reporting planner, comments on site-specific constraints. I have not undertaken a full transport assessment of any submission, as that is not my role in this hearing.

2. Discussion of transport outcomes from rural-residential development patterns

I understand that the Proposed District Plan (PDP) already provides ample capacity for rural dwellings, more than 2.3 times projected demand, without needing further rezoning¹. Rural-fringe development typically increases a reliance on the use of private vehicles because such locations are typically distant from shops, schools, and employment. These areas are typically not served by frequent public transport and generally have a lack of walking or cycling infrastructure, making private vehicle use a necessity rather than a choice.

NZ Transport Agency Waka Kotahi (NZTA) Research Report 726² identifies a range of negative outcomes for people living more remotely from centres (my emphasis added):

*“The literature demonstrates that sprawl can lead to negative effects on our urban environment. **Lower density urban form is commonly identified as producing more carbon due to increased use of energy, transportation and intensified use of land and infrastructure** (Ghosh & Vale, 2009). Urban sprawl is also associated with many other adverse 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)”*

.....

*“Regional accessibility refers to a location relative to regional activity centres (CBDs or other major employment centres) and the number of jobs and services within a given travel distance or time. According to Litman and Steele (2024), regional accessibility has little effect on trip generation but has the largest impact on trip length and mode choice compared to other urban form characteristics. **If people live further from an urban centre where there are a high number of jobs and zones of attraction, they will drive significantly further annually than if they lived in a neighbourhood that is closer to an urban centre.**”*

Trip generation studies used in New Zealand show substantially higher vehicle trip rates for low-density/lifestyle dwellings compared with suburban dwellings. The New Zealand Trip Database Bureau records the following average trip rates based on historical surveys:

- Residential – Lifestyle Dwelling: 1.31 veh/hr/dwelling and 12.28 veh/day/dwellings
- Residential – Dwelling³: 0.71 veh/hr/dwelling and 8.85 veh/day/dwellings

Lifestyle dwellings therefore generate around 40–50% more vehicle movements during the peak hour and on a daily basis than suburban dwellings. These trips also tend to be over greater distances, increasing vehicle kilometres travelled (VKT) increasing greenhouse gas emissions and other pollutants that are generated by vehicles.

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 to address unsealed roads, narrow carriageways, unsafe roads and intersections, and higher expectations from users of the road.

As discussed in Section 2.6⁴ of my hearing report for Hearing 11 – Transport, cumulative transport effects are challenging to address at resource consent stage. Mitigating cumulative effects often requires a combination of developer funded and Council-funded infrastructure improvements. Given this

¹ FAR NORTH DISTRICT PLAN REVIEW – RURAL ZONE, prepared by Market Economics, dated 30 July 2025.

² Assessing the relationship between the sustainability of urban form and transport in Aotearoa New Zealand <https://nzta.govt.nz/assets/resources/research/reports/726/726-assessing-sustainability-of-urban-form-and-transport.pdf>

³ Surveys of typical suburban areas

⁴ Appendix 3 to s42a Report Transport, available online at https://www.fndc.govt.nz/data/assets/pdf_file/0026/39194/Appendix-3-Abley-Report.pdf

complexity, bulk transport infrastructure needs are best addressed through Structure Plans and/or Plan Changes that rezone land for more intensive development.

3. Network capacity in the Kerikeri-Waipapa area

None of the submitters have provided evidence from a transport expert, nor have the potential cumulative effects on the transport network from the submissions been tested.

In absence of this information, I have referenced the Beca Spatial Plan Hybrid Scenario Transport Inputs memorandum⁵ (Beca memo), which forms part of Council's Te Pātukurea – Kerikeri Waipapa Spatial Plan assessment (Spatial Plan).

Council has undertaken traffic modelling for the future transport network, based on a 30-year horizon. At the time of writing my evidence, traffic modelling for the "Hybrid Scenario" for the Spatial Plan has not been completed. I have therefore relied on the Beca memo, which provides the inputs for the Hybrid Scenario modelling. Beca memo assumes that the following transport improvements will be required (subject to traffic modelling for the Hybrid Scenario), shown indicatively in Figure 3.1:

- Kerikeri Bypass, Hone Heke Roundabout and Hall Road connection.
- New roundabouts on SH10 at Waipapa Road and Kerikeri Road.
- Shared paths on Waipapa and Kerikeri Road.
- Right turn bay intersections on SH10 in Waipapa.
- Road extensions Waipapa.
- Public transport service (bus) and bus stops Kerikeri and Waipapa.

The Beca memo identifies several risks for the future transport network:

- 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.
- Higher car use and more growth in surrounding areas may lead to more traffic in Kerikeri / Waipapa.

This has implications for the submissions, which may rely on or accelerate the need for the improvements identified by Beca, place additional demand on the Heritage Bypass and SH/10 Waipapa Road roundabout, and will result in higher car use and greater growth in peripheral areas of Kerikeri / Waipapa.

⁵ Hybrid Scenario Transport Inputs memo, prepared by Beca, dated 5 February 2025, available online at https://www.fndc.govt.nz/_data/assets/pdf_file/0025/38644/e67beb77d4bcb0b4e08c517a2ac06b7e3e14ddf1.pdf.

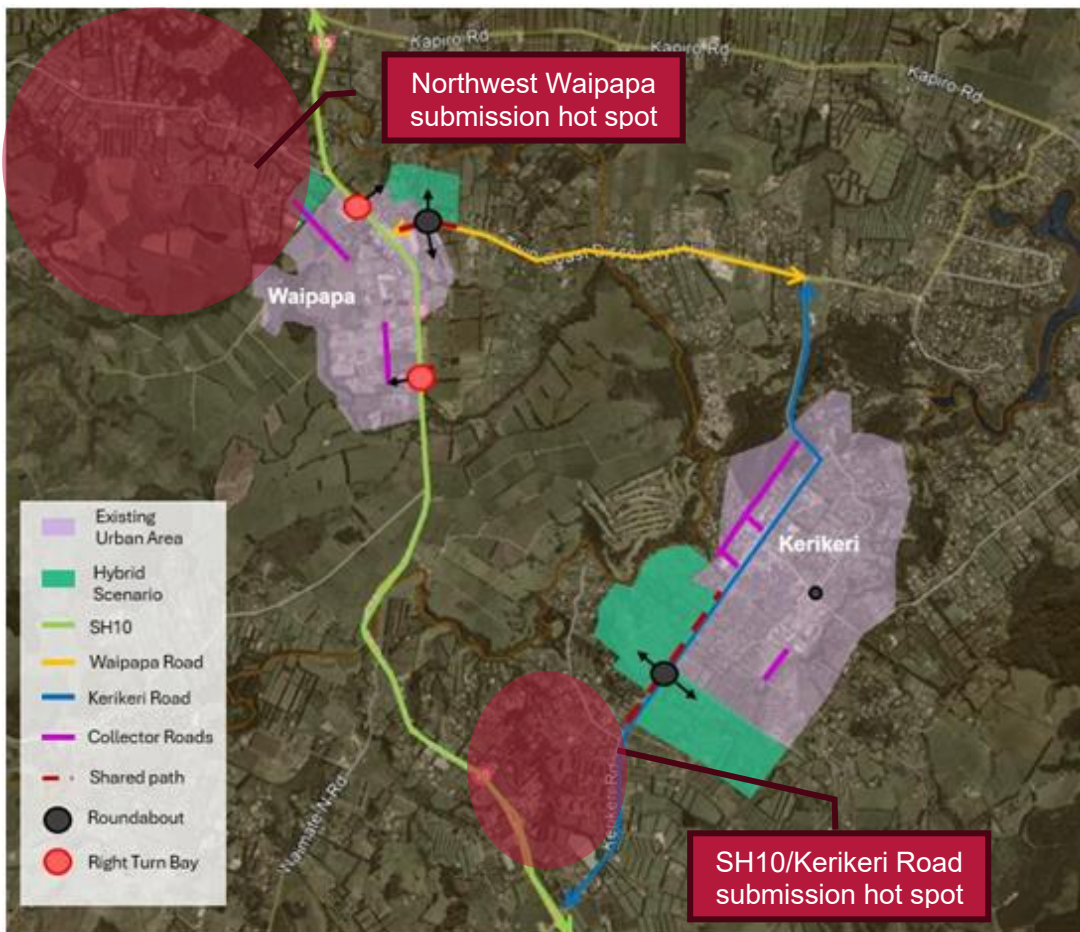


Figure 3.1 Assumed significant transport upgrades – Spatial Plan Hybrid Land Use Scenario (Source: Beca memo Figure 2), showing rezoning “hotspots”

4. Discussion of specific submissions

At the request of Council’s reporting planner I have considered specific submissions:

- Various rezoning submissions within the Kerikeri-Waipapa area
- S67 Michael John Winch
- S51 Jeff and Robby Kemp and S92 Ernie Cottle
- S295 Gray Gilrairie Holdings Ltd and FS343 Okura Trust
- S403 Meridian Farm Ltd
- S404 Musson Family Trust
- S551 Lucklaw Farm Ltd.

None of the submitters have provided evidence from a transport expert. I have not undertaken a full transport assessment of any submission, as that is not my role in this hearing. My evidence is therefore limited to a high-level review of site-specific constraints.

In summary, I consider that all of these submissions have transport matters that should be further assessed prior to any rezoning being approved.

4.1 Various submissions within the Kerikeri-Waipapa area

Council's reporting planner has requested I provide comments on "hot spot" areas, shown in Figure 3.1, where there are multiple rezoning submissions:

- SH10/Kerikeri Road; and
- Northwest Waipapa, including Pungaere Road, Koropewa Road and Riverstream Drive.

As discussed in Section 3, these submissions may rely on or accelerate the need for the transport improvements identified by Beca, place additional demand on the Heritage Bypass and SH/10 Waipapa Road roundabout, and will result in higher car use and greater growth in peripheral areas of Kerikeri / Waipapa..

The absence of modelling from the submitters makes it extremely difficult to assess the potential transport effects of the submitters proposals with any confidence. I am therefore unable to comment on how the rezonings may affect the existing and future transport network, other than to note the transport improvements and potential risks to the transport network identified in the Beca memo

4.2 S51 Jeff and Robby Kemp and S92 Ernie Cottle

The submissions seek to rezone 24 Lots accessed from Waitotara Drive, Kerikeri, to Rural Residential⁸. These sites range from 8000m to 1.2ha. Mr Kemp does not provide a yield estimate, however based on the permitted minimum lot size of 4000m around, each site could be subdivided into another 1 – 2 sites, with a potential yield of around 36 dwellings.

Should the site be rezoned, this could generate approximately 47 veh/hr and 440 veh/day, based on the trip generation rates discussed in Section 2. 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.

⁸ Statement of Evidence, Jeffery Kemp, dated 10 Jun2 2025, [www.fndc.govt.nz/ data/assets/pdf_file/0029/41879/Jeff-and-Robby-Kemp,-S51-and-Ernie-Cottle,-S92-J-Kemp,-Hearing-evidence.pdf](http://www.fndc.govt.nz/data/assets/pdf_file/0029/41879/Jeff-and-Robby-Kemp,-S51-and-Ernie-Cottle,-S92-J-Kemp,-Hearing-evidence.pdf)



Figure 4.1 S51 Jeff and Robby Kemp site (Source, Submission 51)

4.3 S67 Michael John Winch

The submission seeks to rezone 31 lots totalling approximately 134ha to Rural Lifestyle zone at Henderson Bay Road and Otaipango Road, Horora⁹. Mr Winch does not provide a yield estimate, however he states each existing lot could be subdivided into 2 – 4 lots¹⁰, which I assume means an additional 31 to 93 lots could be developed.

Should the site be rezoned, this could generate approximately 41 – 122 veh/hr and 381 – 1,142 veh/day, based on the trip generation rates discussed in Section 2. Arguably, dwellings in this location are more likely to be holiday homes and therefore have periods of lower trip generation, however I consider the trip rates in Section 2 are suitable to assess peak holiday periods as well.

Mr Winch states that Henderson Bay Road is mostly unsealed and is often corrugated and potholed and that subdivision would “increase the economics of sealing [Henderson Bay Road]”¹¹. As discussed in Section 2, rezoning the site could create challenges for Council, where increased vehicle movements may negatively affect rural roads and intersections that aren’t designed to support higher vehicle movements, increasing negative safety outcomes and asset degradation. Council may not have funding available to improve Henderson Bay Road, and I understand that any Development Contributions that Council collected from the sites could not be specifically ring-fenced to fund these works.

⁹ Lay Evidence, Michael Winch, dated 17 May 2025, www.fndc.govt.nz/data/assets/pdf_file/0021/41358/Michael-John-Winch,-S67,-FS241-Hearing-evidence.pdf

¹⁰ Ibid, para 26

¹¹ Ibid, para 56

The increased turning movements at the SH1/Henderson Bay Road intersection may require a right turning bay on SH1, depending on the number of traffic movements at the intersection. In my view this should be assessed, and NZTA consulted, before any rezoning was approved.



Figure 4.2 S67 Michael John Winch site (Source: Lay Evidence of Michael Winch)

4.4 S295 Gray Gilrairie Holdings Ltd and FS343 Okura Trust

The submission seeks to rezone approximately 100ha to Rural Residential zone along Shepherds Road and Okura Dr in Kerikeri, with a potential yield of 175 to 350 lots¹². No assessment of transport effects has been provided, instead Mr McPhee states that assessments can be undertaken at the time of development¹³.

Should the site be rezoned, this could generate approximately 230 – 460 veh/hr and 2,150 – 4,300 veh/day, based on the trip generation rates discussed in Section 2. This would be a significant increase in traffic on roads between the site and Kerikeri, which could affect the timing of future upgrades required to support the Spatial Plan, including roundabouts on Cobham Road, discussed in Section 3.

¹² Statement of Evidence of Andrew McPhee, dated 9 June 2025, www.fndc.govt.nz/data/assets/pdf_file/0019/41356/Gray-Gilrairie-Holdings-Limited,-S295-A-McPhee,-Planning-evidence.pdf

¹³ Ibid, para 66

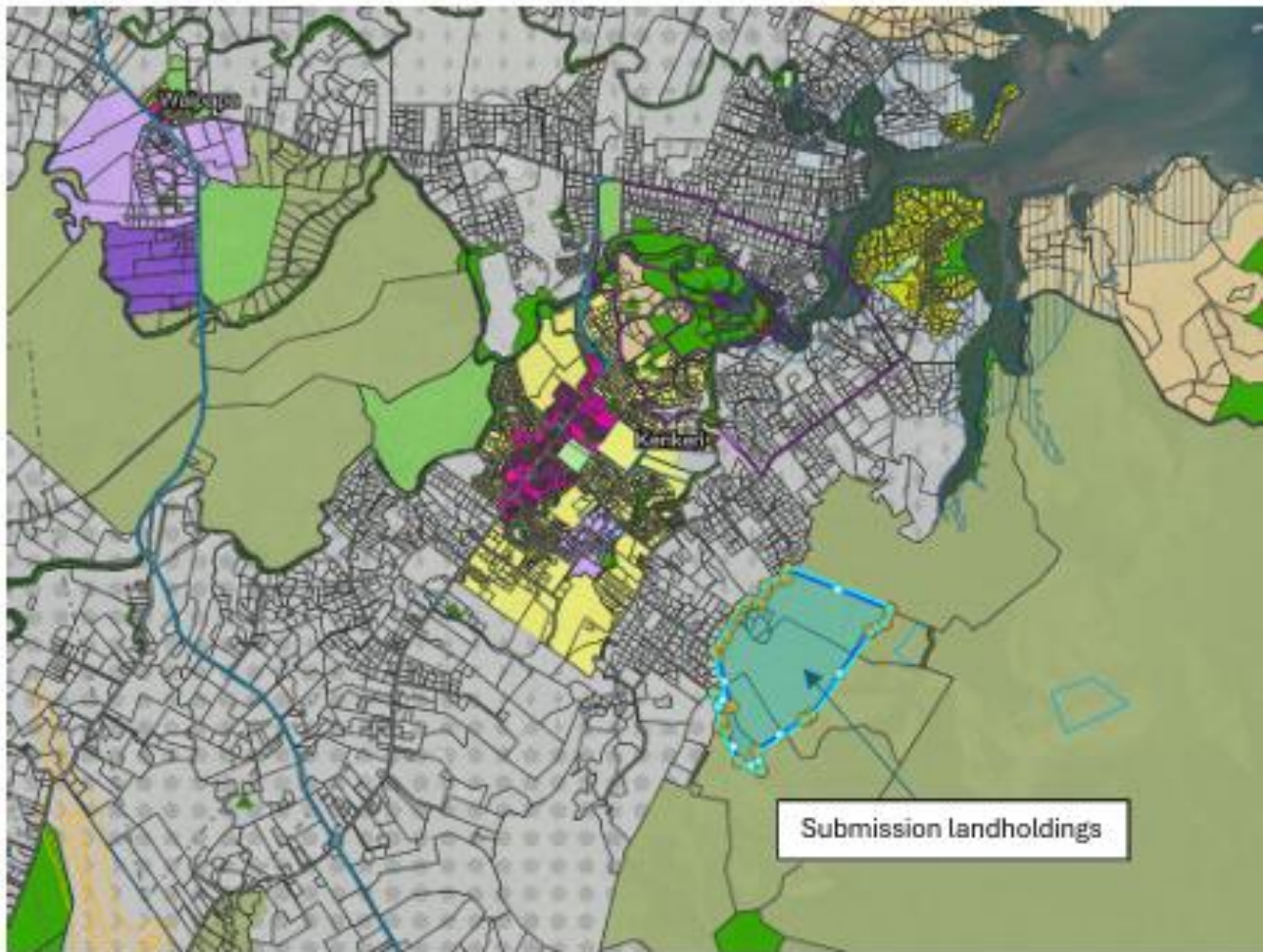


Figure 4.3 S295 Gray Gilrairie Holdings Ltd site (Source: Statement of Evidence of Andrew McPhee)

4.5 S403 Meridian Farm Ltd

The submission seeks to rezone approximately 68ha to Rural Lifestyle zone at 119 Redcliffs Road Kerikeri¹⁴. Mr Henahan states that the zoning sought would reflect subdivision consent that has already been granted and would result in an additional 19 – 33 lots¹⁵. No assessment of transport effects has been provided.

Should the site be rezoned, this could generate approximately 25 – 43 veh/hr and 223 – 405 veh/day, based on the trip generation rates discussed in Section 2. 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.

¹⁴ Statement of Evidence, Joseph Henahan, dated 9 June 2025, [www.fndc.govt.nz/ data/assets/pdf_file/0024/41487/Meridian-Farm-Ltd.-S403-J-Henahan.-Planning-evidence.pdf](http://www.fndc.govt.nz/data/assets/pdf_file/0024/41487/Meridian-Farm-Ltd.-S403-J-Henahan.-Planning-evidence.pdf)

¹⁵ Ibid, para 6.1 and para 6.6



Figure 4.4 S403 Meridian Farm Ltd site (Source: Statement of Evidence of Joseph Henehan)

4.6 S404 Musson Family Trust

The submission seeks to rezone 21 lots totalling approximately 25ha to Settlement zone at Houhora Heads Road, Pukenui¹⁶. Mr Henehan does not provide a yield estimate, however the Settlement Zone permits 3,000m² lots, and lots of 1,500m² can be sought as a Discretionary Activity. Based on the permitted density, I assume that a total of around 83 lots could be developed.

Should the site be rezoned, this could generate approximately 109 veh/hr and 1,019 veh/day, based on the trip generation rates discussed in Section 2. Mr Henehan notes that the intersection of SH1/Houhora Heads Road may require deceleration/turning lanes, but he considers that any upgrades can be addressed through future development consenting processes, and that NZTA has not opposed the rezoning submission and therefore must not have any concerns.

I agree with Mr Henehan that an upgrade to the intersection may be required. However, as I discussed in Section 2, cumulative transport effects are challenging to address at resource consent stage. Mitigating cumulative effects often requires a combination of developer funded and NZTA and/or Council-funded infrastructure improvements benefiting multiple parties. This is particularly challenging where there are multiple landowners that may benefit from the upgrade, but no overarching mechanism (such as a Development Area or staging provisions) that ensures that infrastructure is provided in a timely manner and costs are fairly apportioned to all beneficiaries.

¹⁶ Statement of Evidence, Joseph Henehan, dated 9 June 2025, https://www.fndc.govt.nz/data/assets/pdf_file/0025/42973/Musson-Family-Trust,-S404-J-Henehan,-Planning-evidence-V2.pdf

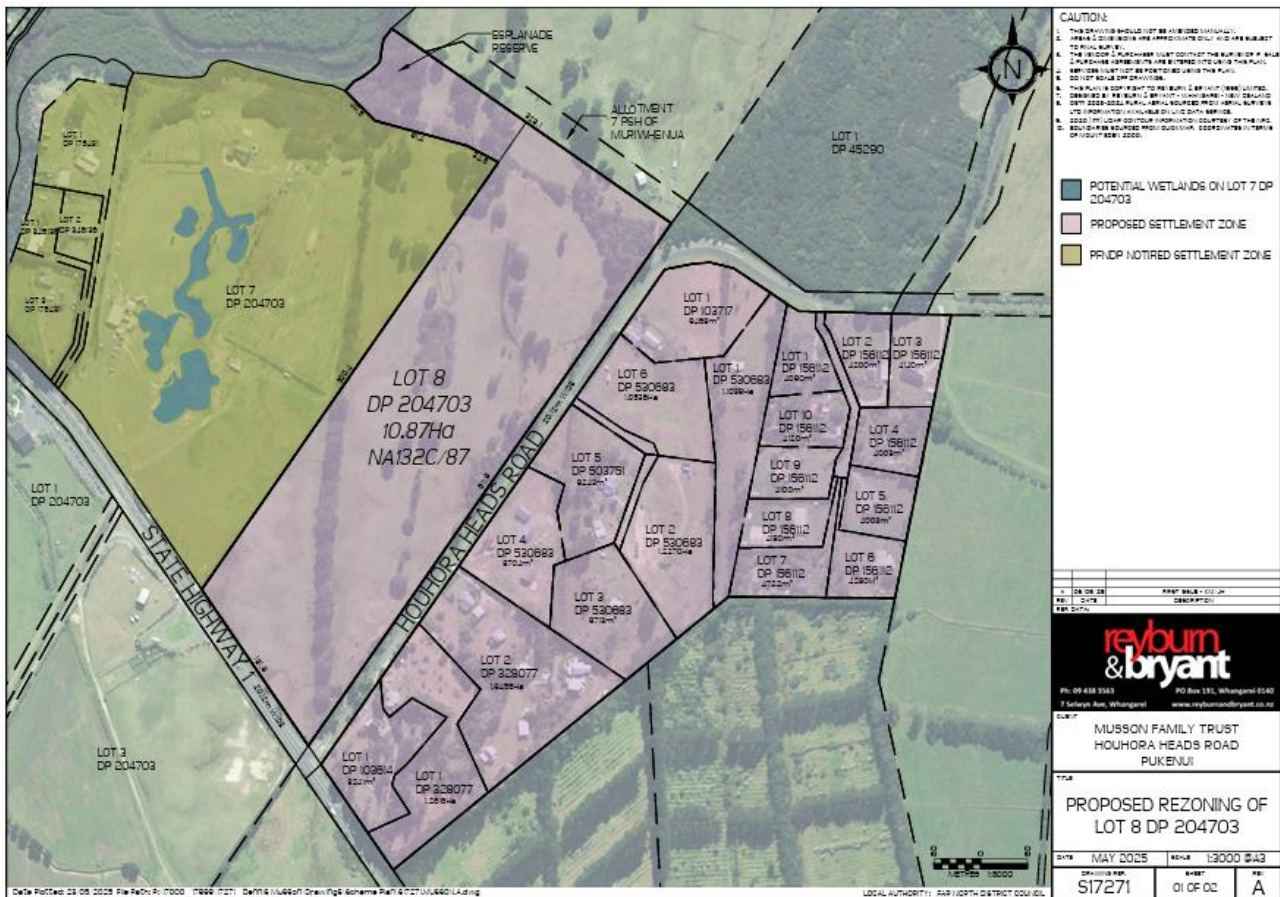


Figure 4.5 S404 Musson Family Trust site (Source: Statement of Evidence, Joseph Henehan)

4.7 S551 Lucklaw Farm Ltd

The submission seeks that land set out in the diagram below is zoned as a combination of Mixed use or Residential (identified as A), Rural Lifestyle (identified as B), and Rural Production (identified as C)¹⁷. Mr Langman estimates that up to 32 dwellings could be developed within the Rural Lifestyle area¹⁸. A yield estimate for the Mixed Use/General Residential area is not provided. Based on an Area A being approximately 24ha, and the existing residential development in Rangiputa being approximately 12ha and containing approximately 100 dwellings, I have estimated the yield to be approximately 200 dwellings.

Should the site be rezoned, and based on an assumed yield of 232 dwellings, this could generate approximately 304 veh/hr and 2,849 veh/day, based on the trip generation rates discussed in Section 2. Arguably, dwellings in this location are more likely to be holiday homes and therefore have periods of lower trip generation, however I consider the trip rates in Section 2 are suitable to assess peak holiday periods as well.

Mr Langman notes that an indicative roading layout is shown in the master plan, but this requires further consideration, which he considers can be undertaken as part of subdivision¹⁹. However, upgrades to existing transport infrastructure may also be required.

As I discussed in Section 2, cumulative transport effects are challenging to address at resource consent stage. Mitigating cumulative effects often requires a combination of developer funded and NZTA and/or

¹⁷ Statement of Evidence, Marcus Langman, dated 9 June 2025, www.fndc.govt.nz/data/assets/pdf_file/0020/41582/MLANGM~1.PDF

¹⁸ Ibid para 51

¹⁹ Ibid para 104

Council-funded infrastructure improvements benefiting multiple parties. This is particularly challenging where there are multiple landowners that may benefit from the upgrade, but no overarching mechanism (such as a Development Area or staging provisions) that ensure infrastructure is provided in a timely manner and costs are fairly apportioned to all beneficiaries.



Figure 4.6 S551 Lucklaw Farm Ltd site (Source: Statement of Evidence, Marcus Langman)

Auckland

Level 1/70 Shortland Street
Auckland 1010
Aotearoa New Zealand

Wellington

Level 1/119-123 Featherston Street
Wellington 6011
Aotearoa New Zealand

Christchurch

Level 1/137 Victoria Street
PO Box 36446, Merivale
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Memo

Date: 22 August 2025

To: Melissa Pearson - Principal Consultant - Planning, SLR (on behalf of FNDC)

From: Dr Reece Hill - Soil Consultant, Landsystems

Subject: Assessment of Highly Productive Land Status for LOT 2, DP 336924, Ōkaihau, in accordance with the National Policy Statement for Highly Productive Land (NPS-HPL).

1 Purpose

- 1.1 This memorandum provides an assessment of the Land Use Capability (LUC) and Highly Productive Land (HPL) status of the property at LOT 2, DP 336924, and its compliance with the National Policy Statement for Highly Productive Land (NPS-HPL) Clause 3.10.

2 Background and property context

- 2.1 The subject property, a 9.6-hectare land parcel (LOT 2, DP 336924), is situated on the northern side of Horeke Road, adjacent to the Ōkaihau village. The property is bounded by existing residential dwellings, Horeke Road, and St Catherine's Anglican Church and cemetery.
- 2.2 The New Zealand Land Resource Inventory (NZLRI) database initially classifies 2.68 hectares (28%) of the property as LUC 2s1 land. LUC 2s1 land is considered HPL under the transitional definition of the NPS-HPL (**Figure 1**).

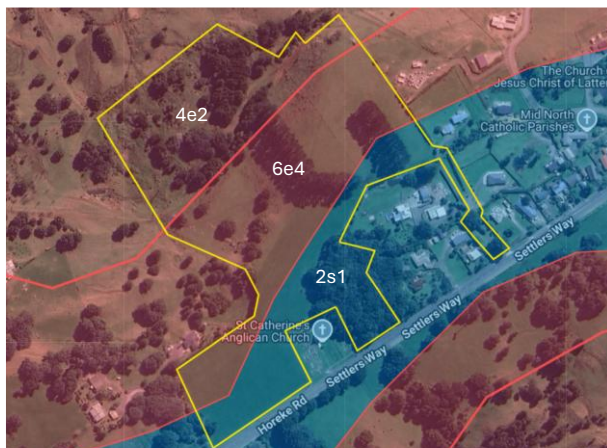


Figure 1: Image showing the distribution of NZLRI mapped LUC units for the Carr property (HPL area are coloured blue, areas that are not HPL are coloured red).

3 Field assessment findings and reclassification

- 3.1 A detailed on-site LUC assessment was undertaken by Mr Bob Cathcart, a Land and Environmental Management Consultant with extensive experience in LUC mapping. The report states that the assessment utilised the methods prescribed in the *New Zealand Land Use Capability Survey Handbook (3rd Edition, 2009)*¹, which supersedes the base data used for the NZLRI database. Mr Cathcart has used the land use capability units described in Harmsworth's Extended Legend for the Northland Region², which is appropriate.
- 3.2 The findings of this field assessment led to a reclassification of the LUC units on the property, providing a more accurate representation of its productive capacity (**Figure 1**). This is appropriate.

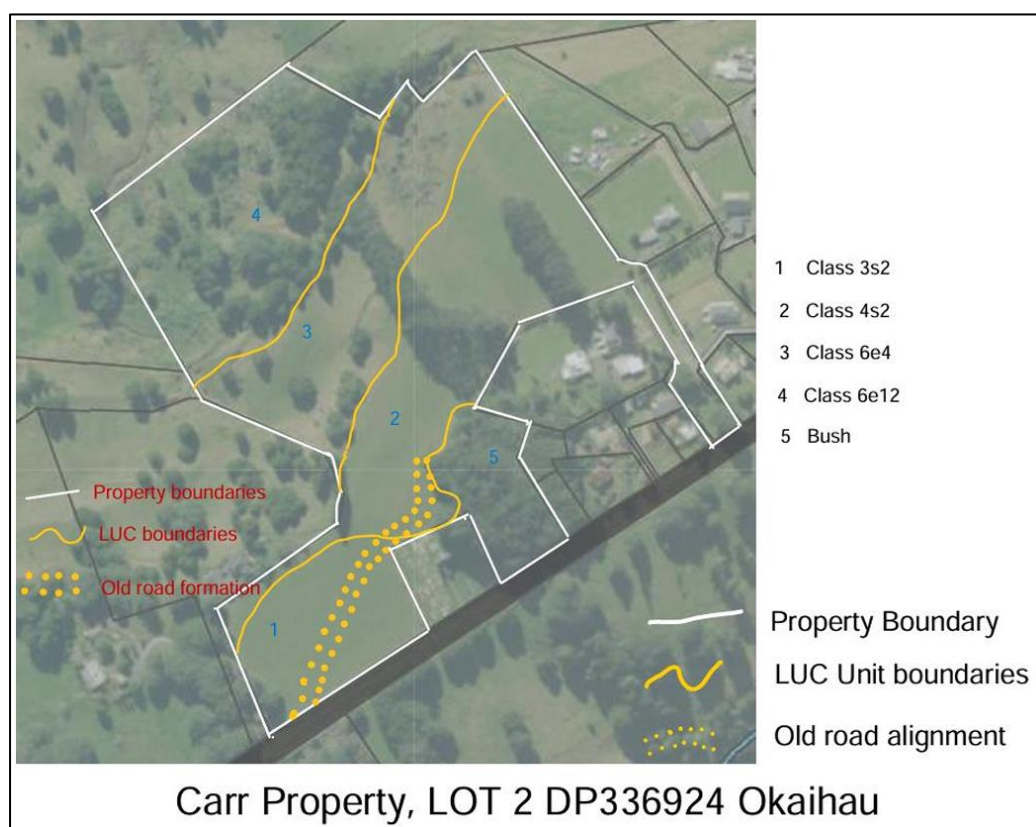


Figure 1: On-site mapped LUC units (reproduced from Mr Cathcart's report).

¹ Lynn IH, Manderson AK, Page MJ, Harmsworth GR, Eyles GO, Douglas GB, Mackay AD, Newsome PJF 2009. NZ Land Use Capability Survey Handbook – a New Zealand handbook for the classification of land (3rd Edition). Hamilton, AgResearch; Lincoln, Landcare Research; Lower Hutt, GNS Science. p163.

² Harmsworth, G.R. 1996. Land Use Capability classification of the Northland Region. A report to accompany the second edition (1:50,000) NZLRI worksheets. Landcare Research Science Series 9. Lincoln, Manaaki Whenua Press, 269p.

3.3 However, it is noted that the report lacks specific soil descriptions and soil depth information to substantiate the reclassification of LUC units, which prevents a definitive confirmation of the findings. Mr. Cathcart is an experienced LUC mapper in the Northland region, and in the absence of this supporting data, I rely on his expert assessment. The revised LUC units are as follows:

- Class 3s2: 1.15 hectares (12%)
- Class 4s2: 3.0 hectares (31%)
- Class 6e4: 2.5 hectares (26%)
- Class 6e12: 2.0 hectares (21%)
- Native Bush: 1.0 hectare (10%)

3.4 This reclassification demonstrates a significant reduction in the area of land genuinely suitable for cultivation from the initial NZLRI-LUC assessment. Furthermore, the LUC assessment identified that an old road formation, a feature not captured by the NZLRI database, runs diagonally across the Class 3s2 area. This feature, comprising compacted subsoil and rock foundation, renders a 7- to 10-metre-wide strip of this land impractical for cultivation, reducing the total available cultivable land to approximately 1.0 hectare (**Figure 2**).



Figure 2: Google Earth image showing approximate LUC 3s2 area – and old road formation.

4 Assessment against NPS-HPL clause 3.10

4.1 Based on the findings of the field assessment, the property meets the criteria for exemption under NPS-HPL Clause 3.10.

Permanent or Long-Term Constraints on Economic Viability (clause 3.10(1)(a))

4.2 Mr Cathcart states that the property is subject to permanent constraints that mean its use for land-based primary production is not economically viable for at least 30 years. These constraints include:

- *Limited Scale:* The effective cultivable area of approximately 1.0 hectare is far too small to support an economically viable commercial farming, market gardening, or horticultural operation. The scale is insufficient to attract interest from commercial growers and is more suited to home-based food production.
- *Water Scarcity:* The on-site assessment notes a lack of groundwater resources in this locality. Without irrigation, which is not a reasonably practicable option, the land cannot reliably support horticulture or vegetable and arable cropping, particularly during dry seasons.

Avoidance of Significant Loss and Fragmentation (clause 3.10(1)(b)(i) & (ii))

4.3 Mr Cathcart states that the proposed change in land use for this property will not result in a significant loss of productive capacity at a district or regional level:

- The 1.15 hectare of cultivable land on the property represents a negligible portion of the Far North District's total LUC 2s1 and 3s2 land. It constitutes only 0.07% of the total Far North District Class 2s1 land and less than 0.04% of the Class 3s2 land.
- The property is geographically isolated from other productive land by dwellings, roads, and native bush. It is not part of, nor does it adjoin, a large and geographically cohesive area of HPL.
- The 1.0 hectare of cultivable land on the property represents a negligible portion of the Far North District's total LUC 2s1 and 3s2 land. It constitutes only 0.07% of the total Far North District Class 2s1 land and less than 0.04% of the Class 3s2 land.

- The property is geographically isolated from other productive land by dwellings, roads, and native bush. It is not part of, nor does it adjoin, a large and geographically cohesive area of HPL.

Benefits outweigh costs (clause 3.10(1)(c))

- 4.4 The environmental, social, and economic benefits of changing the land's use from unproductive primary production to residential or rural lifestyle purposes outweigh the long-term costs of losing a small, constrained area of HPL. The existing native bush and natural topography provide a natural buffer between the Ōkaihau village and more productive land to the west, mitigating potential future conflicts.

5 Conclusion

- 5.1 The initial NZLRI classification of a portion of LOT 2, DP 336924 as HPL is inconsistent with its actual productive capacity as determined by Mr. Cathcart's on-site field assessment.
- 5.2 The property is subject to permanent constraints related to its limited size, a lack of groundwater resources, and the presence of an old road formation, rendering it economically unviable for intensive land-based primary production.
- 5.3 Mr. Cathcart's report lacks specific soil descriptions and soil depth information to substantiate the reclassification of the LUC units, which prevents a definitive confirmation of the findings. In the absence of this supporting data, I have relied on his expert assessment, given his extensive experience as an LUC mapper in the Northland region.
- 5.4 Based on my review, the negligible impact of its removal from the HPL resource, coupled with its isolated nature and the potential for reverse sensitivity effects, demonstrates that the property meets the specific tests for exemption under NPS-HPL clause 3.10.