

**BEFORE HEARINGS COMMISISONERS 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 Gray Giltraine Holdings Limited

HEARING TOPIC: Hearing 15C – Rezoning General

STATEMENT OF PLANNING EVIDENCE OF ANDREW CHRISTOPHER MCPHEE

9 June 2025

INTRODUCTION

1. My name is Andrew Christopher McPhee. I am a Director / Consultant Planner at Sanson and Associates Limited and Bay of Islands Planning (2022) Limited.
2. I have been engaged by Gray Gilraine Holding Limited (**GGHL**) to collate a response to Minute 14 and provide planning evidence in support of their original submission to the Proposed Far North District Plan (**PDP**)¹.
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 graduated from The University of Auckland in 2007 with a Bachelor of Planning (Honours).
5. I began my planning career with Boffa Miskell, where I was a graduate planner until 2009. The same year I joined the Auckland Regional Council in the Policy Implementation Team. When the Auckland Councils amalgamated in 2010, I worked in a number of planning roles, leaving in 2015 as a Principal Planner in the Central and Island Planning Team.
6. I joined the Far North District Council (**FNDC**) in 2015 as a Senior Policy Planner working principally on the review of the district plan. I left FNDC in December 2023 and joined Sanson and Associates Limited and Bay of Islands Planning (2022) Limited with my co-director Steven Sanson.
7. I have been involved in a number of plan change and resource consent hearing processes in my time at Auckland Council, including as the planning lead for a number of topics for the Auckland Unitary Plan process. At FNDC I project managed private plan change 22 and was the portfolio lead for a number of topics for the PDP.
8. I am a full member of the New Zealand Planning Institute and a member of the Resource Management Law Association. In February 2024, I was certified with excellence as a commissioner under the Ministry for the Environment's Making Good Decisions programme.

SCOPE OF EVIDENCE

9. The primary submission by GGHL seeks rezoning of landholdings east of Kerikeri Township to Rural Residential zone. The land is currently zoned Rural Production in the PDP.

¹ Submission 295

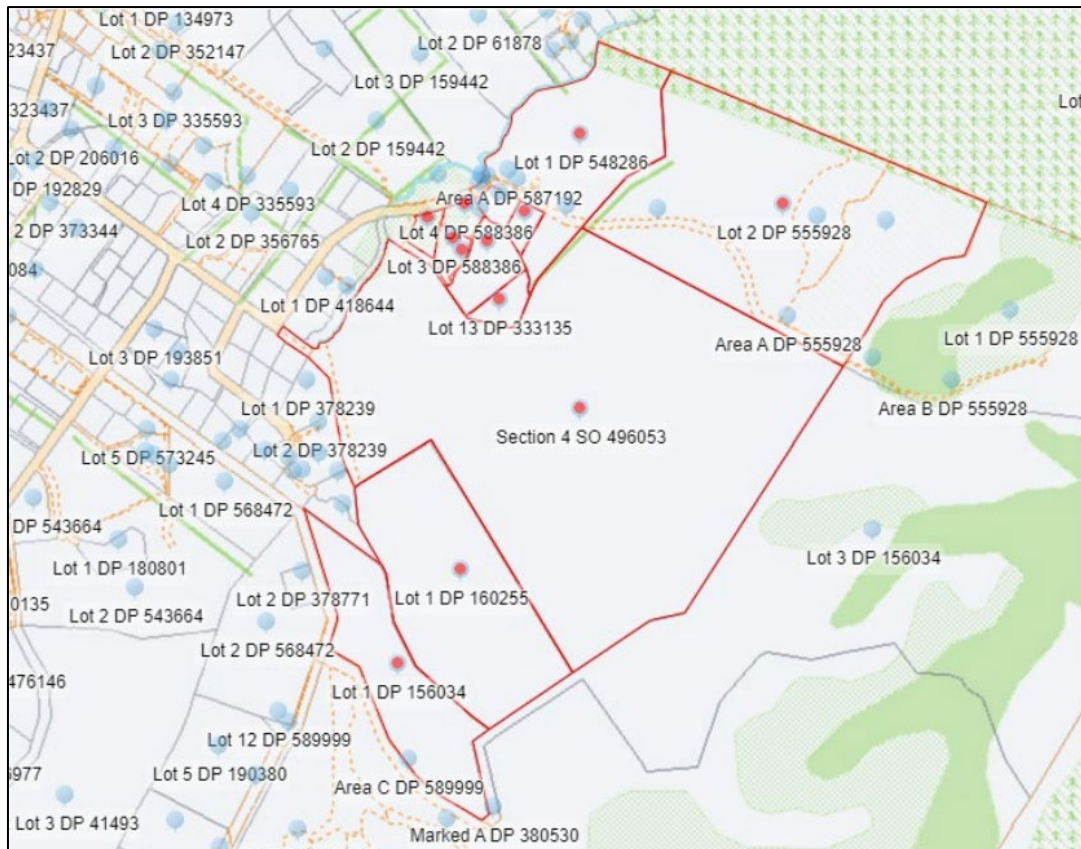


Figure 1: Landholdings seeking Rural Residential zone (Source: Prover)

| Address | Legal Description | Land Area |
|-----------------|-------------------------------------|-----------|
| 99 Shepherd Rd | Section 4 Survey Office Plan 496053 | ~46.3ha |
| 101 Shepherd Rd | Lot 1 DP160255 | ~11.6ha |
| Shepherds Rd | Lot 1 DP156034 | ~6.7ha |
| 9 Okura Dr | Lot 1 DP588386 | ~0.4ha |
| 11A Okura Dr | Lot 2 DP588386 | ~0.4ha |
| 11B Okura Dr | Lot 3 DP588386 | ~0.5ha |
| 13 Okura Dr | Lot 4 DP588386 | ~0.4ha |
| 15 Okura Dr | Lot 12 DP333135 | ~1.5ha |

| | | |
|--------------|---------------------------------|--------|
| 17 Okura Dr | Lot 13 DP333135 | ~0.7ha |
| 17A Okura Dr | Lot 7 DP548286 | ~0.4ha |
| 17B Okura Dr | Lot 8 DP548286 | ~0.4ha |
| 19 Okura Dr | Lot 2 DP555928 & Lot 1 DP548286 | ~30ha |

Figure 2: Landholdings seeking Rural Residential zone

10. The total area of the landholdings subject to the relief sought in the submission to rezone to Rural Residential is ~100ha.
11. My evidence addresses the rezoning request against the criteria set out in Minute 14 from the Independent Hearings Panel (**Minute 14**), which include:
 - How the request is consistent with the PDP strategic direction;
 - How the requested zoning better aligns with the outcomes anticipated by the Rural Residential zone;
 - How the request gives effect to higher order documents;
 - The reasons for the request;
 - An assessment of site suitability and potential effects;
 - Further submissions; and
 - A Section 32AA evaluation.

THE PDP AS IT APPLIES TO THE LANDHOLDINGS

12. The land subject to the rezoning submission is located east of the Kerikeri Township and is proposed to be zoned Rural Production. The landholdings directly abut land zoned Rural Residential in the PDP (see Figure 3).

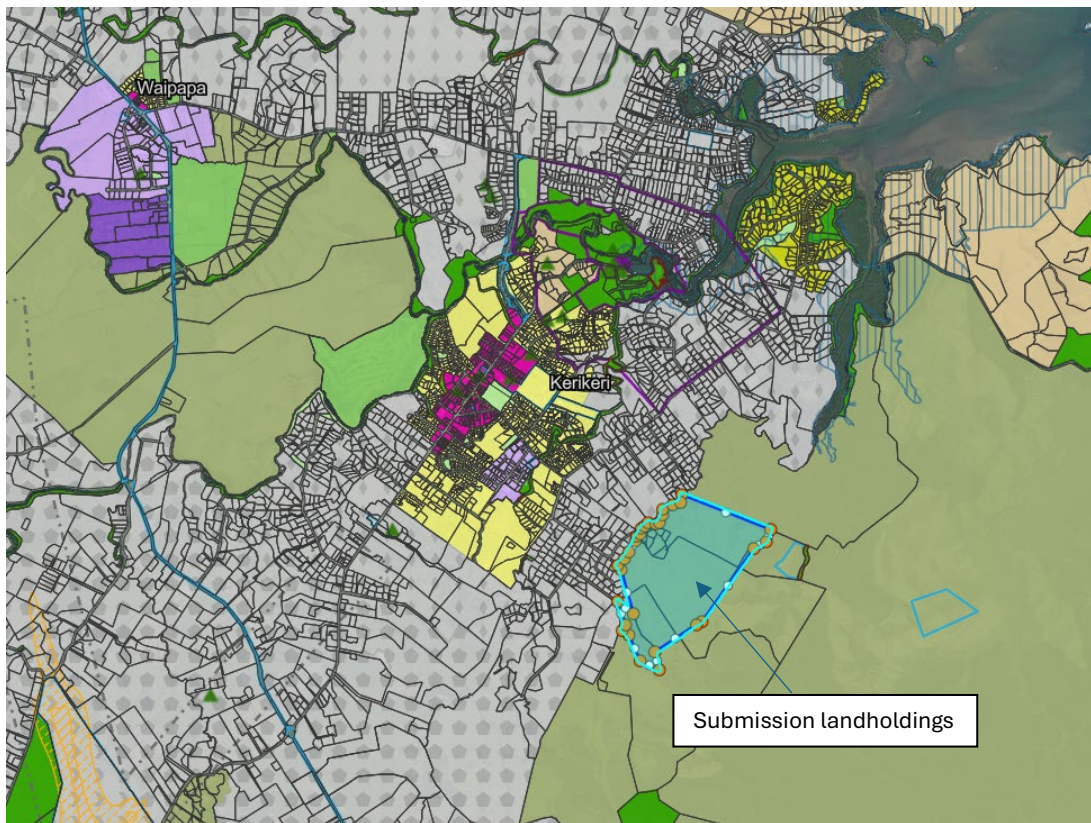


Figure 3: PDP zoning (Source PDP Maps)

STRATEGIC DIRECTION

13. I believe that rezoning land in this location on the urban fringe of Kerikeri Township generally aligns with the Strategic direction identified in the PDP. Principally, Council is responsible under section 31 of the Resource Management Act 1991 (**RMA**) to “...to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district”.
14. Outside of the Residential and Mixed use zones within urban areas, the Rural Residential zone is another way in which Council is able to provide sufficient development capacity for housing to meet projected growth demands.
15. I am concerned that Councils inability to produce data in relation to development infrastructure in and around Kerikeri, questions the ability to provide sufficient development capacity within Kerikeri’s urban area. If development capacity cannot be assured within the urban area of Kerikeri then further reliance needs to be placed on the urban periphery to deliver sufficient land to accommodate the forecast growth, until such time that the infrastructure can be provided.
16. I am aware that there is \$6.8 million set aside for the Kerikeri wastewater treatment and network scheme expansion (stages 2 and 3) in the Long-Term Plan (**LTP**)². Longer term I

² FNDC Te Pae Tata Three Year Long Term Plan 2024-27: Page 72

am also aware that Council have ~\$30 million allocated for the expansion of the wastewater network Stage 2, Kerikeri in years 2029-2031³.

17. What is not clear from Council documents is a solution for the discharge consent to accommodate any further capacity upgrade to accommodate growth for the Kerikeri wastewater treatment plant, despite ~\$250K allocated for the consent renewal and expansion through years 2025 - 2027.
18. I note in Table 13b in the LTP 2024-2027 that Council acknowledges that it did not achieve provision of reliable wastewater infrastructure, protecting their environment and community. In other words, they did not achieve compliance with their resource consents for customer levels of service for wastewater⁴.
19. I note that whilst these elements associated with infrastructure in Kerikeri are planned and promoted, it is concerning that the Council delivered less than half of its 2023/2024 annual plan budget for wastewater improved levels of service and replacement of existing assets, according to the Annual report 2023/2024⁵. This shows the difference between planning and delivery.
20. In respect of the rural environment, the landholdings are identified as class 4 soils, as such are not considered to be highly productive. Therefore, utilising marginal rural land for a higher and better use near the Kerikeri Township, is consistent with **SD-RE-O2** seeking to protect highly productive land from inappropriate development to ensure its productive potential for generations to come.
21. As a general principal locating peri-urban land on the periphery of the urban area affords Council a viable option to upzone that land at an appropriate time. By locating Rural Residential zoning adjacent to existing Rural Residential land, the proposed rezoning promotes logical growth and avoids inefficient fragmentation of Rural Production areas.

ALIGNMENT OF OUTCOMES

22. In summary the Rural Residential Zone seeks to provide:
 - spacious, peri-urban living environments located close to a settlement;
 - a transition to the surrounding 'rural' zones;
 - an ability to undertake domestic scale farming activities;
 - for smaller lot sizes capable of providing for on-site infrastructure;
 - for urban rezoning opportunity when demand requires it.

³ FNDC Te Pae Tawhiti Long Term Plan 2021-31: Page 72

⁴ FNDC Te Pae Tata Three Year Long Term Plan 2024-27: Page 40

⁵ FNDC Ripota a Tau Annual Report 2023/24: Page 39

23. I consider that rezoning the GGHL landholdings in a Rural Residential capacity will align with the outcomes identified in the PDP. The rationale for this conclusion is further explored in the latter sections of my evidence, in summary the landholdings are:
- directly adjoining Rural Residential zoned land adjacent to the Kerikeri Township;
 - under 2km from Kerikeri Primary, Kerikeri Highschool and the town centre and can provide much needed developable land to support growth;
 - generally free of development constraints;
 - not identified as being highly productive land; and
 - in close proximity to the wastewater treatment plant, providing an efficient option in delivering reticulated services at a time when demand requires it.

HIGHER ORDER DIRECTION

24. I consider that the rezoning request gives effect to a number of key higher order documents:

Section 31 of the RMA

25. Section 31 of the RMA places a responsibility on Council to *"ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district"*.
26. If development capacity cannot be assured within the urban area of Kerikeri due to infrastructure constraints or market viability issues, then reliance needs to be placed on the urban periphery to deliver sufficient land to accommodate the forecast growth, until such time that the infrastructure can be provided.
27. Rezoning the GGHL landholdings for rural residential use directly supports Council's obligations under Section 31 by providing a viable and more immediately deliverable option to accommodate forecast growth in Kerikeri, in proximity to the urban environment. This addresses the uncertainty of providing sufficient development capacity within the urban environment by offering a practical alternative that may one day be rezoned for urban capacity, given its proximity to the Kerikeri wastewater treatment plant.

National Policy Statement on Urban Development (NPS-UD):

28. Although primarily urban-focused, the NPS-UD promotes well-functioning environments and responsive planning. This rezoning request contributes to a more adaptable rural-urban fringe, responding to housing needs to service forecast growth for Kerikeri.

29. I note in the section 32 analysis for the Urban chapter of the PDP that “...Council considers that none of its towns will reach the required threshold of 10,000 people to be considered an ‘urban environment’ as defined in the NPS-UD in the short, medium or long term. This is the case under both a medium and high growth scenario. The NPS-UD therefore does not apply to the Council under clause 1.3(1)...”⁶
30. The Spatial Plan on the other hand states that “Should Council adopt the draft spatial plan in June, Kerikeri would become an ‘urban environment’ as defined by the NPS-UD, and Council would become a Tier 3 local authority.”
31. There has been no evidence provided to date that I have seen that demonstrates that Council has sufficient ‘development capacity’⁷ within its urban environment to meet the expected demand for housing and business land over the short, medium and long term required under Policy 2 of the NPS-UD.
32. Development capacity is linked to the provision of development infrastructure, which is Council controlled network infrastructure for water supply, wastewater or stormwater, as well as roading. In Part 3.4: Implementation the NPS-UD addresses the meaning of plan-enabled and infrastructure ready. Development capacity is infrastructure ready in terms of the short and medium term if “in relation to the short term, there is adequate existing development infrastructure to support the development of the land...in relation to the medium term, either paragraph (a) applies, or funding for adequate development infrastructure to support development of the land is identified in a long-term plan”. With the uncertainty surrounding Councils ability to provide sufficient development infrastructure to support growth in the urban environment, I consider it prudent to supply sufficient land on the urban periphery to accommodate the forecast growth for Kerikeri, in accordance with Section 31 of the RMA. This addresses the uncertainty of providing sufficient development capacity within the urban environment by providing a viable option to accommodate forecast growth in a location near the urban environment that may one day be rezoned in an urban capacity.

Regional Policy Statement for Northland (RPS)

33. The landholdings subject to the GGHL submission are located outside outstanding natural landscapes and features, and outside of the coastal environment.
34. Objective 3.5 – Enabling economic wellbeing seeks positive economic outcomes by providing for the economic wellbeing of people and communities. Allowing additional flexibility and supply of residential development options which will meet the strong

⁶ FNDC Section 32 Analysis: Urban Environment: Section 3.2.2 Page 7

⁷ NPS-UD: Development capacity means the capacity of land to be developed for housing or for business use, based on:

- (a) the zoning, objectives, policies, rules, and overlays that apply in the relevant proposed and operative RMA planning documents; and
- (b) the provision of adequate development infrastructure to support the development of land for housing or business use

lifestyle market demand⁸, thereby supporting economic well-being. Further, it will promote an efficient level of land supply that will assist land and housing affordability, which will help reduce upward price pressure on existing land appropriate for residential land use.

35. Objective 3.6 – Efficient and effective infrastructure seeks to optimise the use of existing infrastructure and ensuring that new infrastructure is resilient and meets the need of the community, supports economic development and community needs.
36. The combination of demand for residential options in the rural environment and the current lack of certainty around Councils ability to provide adequate development infrastructure in the urban environment to service forecast growth for Kerikeri, dictates that options need to be provided outside of the urban environment.
37. Providing additional supply of ‘greenfield’ Rural Residential land in the proposed location will complement existing Council infrastructure through not having to rely on existing reticulated networks. This will give Council time to better understand their assets and budget upgrades to their infrastructure to cater for growth in the urban environment.
38. The additional supply of Rural Residential land in this location will encourage decentralised or non-reticulated development that complements, not competes with, land serviced by Council reticulated infrastructure networks.
39. Policy 5.1.1 – Planned and Coordinated Development seeks to ensure that subdivision, use and development are managed in a planned and coordinated manner. Providing additional Rural Residential zoned land in this location aligns with the spatial pattern of the Rural Residential zone, which is located on the periphery of the Kerikeri Township. The distance of the landholdings from the Township is commensurate with other land zoned in this capacity and is closer than the tracts of Rural Residential zoned land to the north of the Kerikeri Township.
40. Rezoning the landholdings to Rural Residential will avoid ad-hoc rural fragmentation by providing a legitimised area for growth and a location for the Kerikeri Township to grow. The proximity of the landholdings to the urban environment and wastewater treatment plant may at a later juncture provide an effective and efficient option for urbanising the land.
41. The subdivision and land use provisions for the Rural Residential zone will manage the effects and maintain the amenity of the land which is designed to provide a buffer or transition between the urban and rural environments.
42. Policy 5.2.2 – Future-proofing infrastructure seeks to encourage the flexible and resilient development of infrastructure. As discussed above in relation to Objective 3.6, providing additional supply of ‘greenfield’ Rural Residential land in the proposed location will

⁸ The Spatial Plan identifies that 51% of residential building consents issued in the study area alone over the past 10 years have been in rural zones [Page 11].

complement existing Council infrastructure through not having to rely on existing reticulated networks. This gives Council time to better understand their assets and budget upgrades to their infrastructure to cater for growth in the urban environment.

Te Pātukurea: Kerikeri-Waipapa Spatial Plan (**Spatial Plan**)

43. I provide a summary of content within the Spatial Plan below for context in relation to the need to rezone the landholdings subject to the GGHL landholdings sought in the submission.
44. Council released the Statement of Proposal for the draft Spatial Plan for consultation in March 2025. It is understood that the Spatial Plan will go before Council for formal adoption in June 2025. As such any evaluation against the Spatial Plan at this juncture is based on the Draft document.
45. It is important also to acknowledge that a spatial plan is a non-statutory document. The intention of the Spatial Plan is to manage growth by identifying areas appropriate for housing, businesses and industry, serving as a blueprint for future planning and investment.
46. Within the Introduction of the Spatial Plan document, it states that *“It is important to note that the projects and initiatives identified in this plan are unfunded at this stage”*. In other words, no financial planning has informed this document other than attributing estimates to provide for necessary infrastructure. *“The projects and initiatives identified in this plan are not committed until council includes funding in its Long-Term Plan or through external funding, and the timing and necessity of the project(s) will need to be reviewed as part of any Long-Term Plan.”*⁹ The Spatial Plan is a project that will compete for funding through the LTP against many projects promoted across the Far North District.
47. The Housing and Business Capacity Assessment (**HBA**) that supports the Spatial Plan estimates a need for 3,260 additional dwellings by 2054. Under a ‘blue sky’ approach identified within the Spatial Plan, the number of dwellings needed increases to 4,690¹⁰.
48. To put the number of additional houses required to service growth under the ‘blue sky’ approach in perspective, the current housing stock for Kerikeri Central, Kerikeri South and Riverview Statistical Area’s, totals 1,314, 1,338 and 1,143 dwellings respectively¹¹. This is represented by the Red, Green and Blue bordered areas in Figure 4 below.

⁹ The Spatial Plan: Page 51

¹⁰ The Spatial Plan: Page 14

¹¹ Statistics New Zealand: 2023 Census: Dwelling occupancy status: Total - dwelling occupancy status

49. Riverview and Kerikeri South cover the majority of the Rural Residential land promoted in Kerikeri through the PDP and contain nearly double the number of dwellings than Kerikeri Central, which is predominantly urban.
50. The Spatial plan acknowledges that “...51% of residential building consents issued in the study area over the past ten years have been in rural zones, indicating a high portion of rural lifestyle housing occurring...” stating that “...This has resulted in large, expensive detached houses, reducing diversity in housing types and affordability...”¹²
51. The Spatial Plan seeks to reduce the residential distribution on rural land to 5%, with the urban areas of Kerikeri and Waipapa accommodating 95% of population growth within the urban areas¹³.
52. In the short-term (1-3 years) the Spatial Plan has signalled within its Implementation Plan to develop a plan change strategy investigating short and long-term changes required to planning provisions to give effect to Spatial Plan, outside of PDP Hearings Process, which may include ‘downzoning’.¹⁴

¹² The Spatial Plan: Page 11

¹³ The Spatial Plan: Page 14

¹⁴ Ibid: page 54

Map 1: The four Kerikeri SA2 areas that correlate with the General Residential, Rural Residential Mixed Use, Light Industrial and Heavy Industrial zones

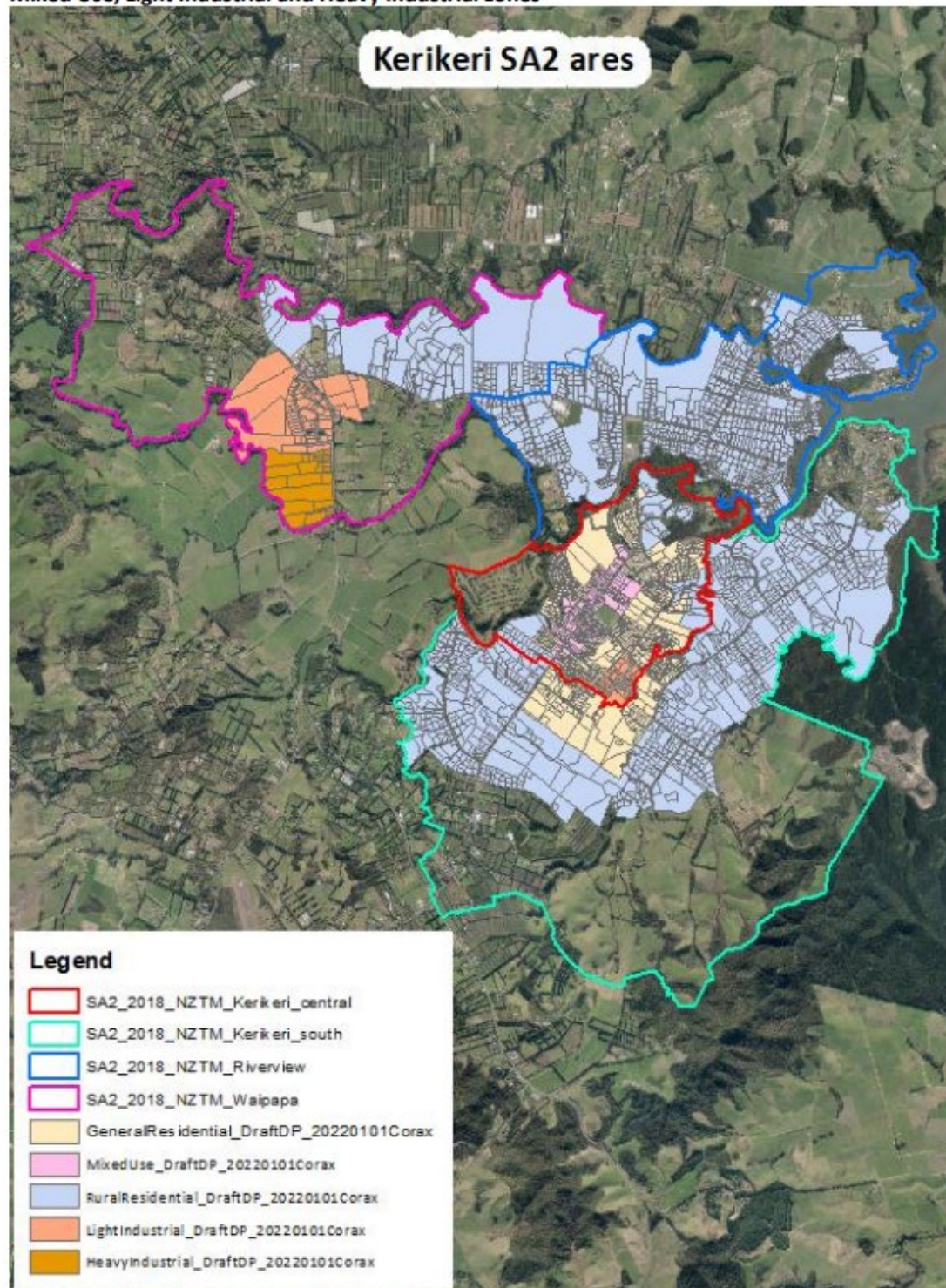


Figure 4: Kerikeri SA2 Areas (Source: Map 1 in Appendix 7e of the PDP Section 32 – Overview)

53. As already identified, the Spatial Plan is not a statutory document and has not yet been adopted by Council. Aside from these reasons I believe it should not be taken into consideration when assessing the merits of the relief sought in the GGHL submission because:

- It does not demonstrate that it can align with the ‘Urban form and development’ strategic direction in the PDP which seeks “*Adequate development infrastructure in place or planned to meet the anticipated demands for housing and business activities.*”
- It provides no certainty for development, as no feasible solution has been identified or funded for development infrastructure to accommodate the number of dwellings forecast.
- Because of the uncertainty of infrastructure delivery, a 95% urban / 5% rural split to accommodate population growth runs the risk of not being able to satisfy Section 31 of the RMA in providing sufficient development capacity in respect of housing and business land to meet the expected demands of the district.
- It lacks evidence supporting demand for housing in the urban environment. Compelling 95% of forecast population growth into the urban environment assumes that people are moving to Kerikeri to live in medium density housing.
- It runs the risk of sterilizing growth in Kerikeri, where demand is historically high in the peri urban areas.

54. I believe there needs to be a balance between providing for development in rural and urban areas, particularly in light of Councils deficiency in understanding their development infrastructure (3 waters and roading).

REASON FOR THE REZONING REQUEST

55. The reason for the request is broadly identified in the submission, stating:

- There is a lack of additional land designated within the proposed zone maps for Rural Residential purposes in proximity to Kerikeri Township;
- Decision making must ensure economic wellbeing of the community;
- Large areas of land southeast of Shepherd Rd have been disregarded despite having very few constraints and having poor soil quality;
- The land is in close proximity to the recently upgraded wastewater scheme; and
- The location is unique isolated by an existing greenbelt cordon (Waitangi Forest).

56. The proximity of the landholdings to the Kerikeri wastewater treatment plant is a significant long-term advantage. While initially relying on-site servicing, its strategic location makes it an ideal candidate for future urban consideration once the Kerikeri wastewater treatment plant undergoes its necessary upgrades, secures the required discharge consent and funding.

57. A phased approach of rezoning the land subject to the GGHL submission Rural Residential at this juncture provides a realistic pathway to accommodate a portion of Kerikeri's future growth and mitigates the immediate pressures on critical, unfunded urban infrastructure. It does this while preserving the long-term option for higher-density urban development.

ASSESSMENT OF SITE SUITABILITY AND POTENTIAL EFFECTS

Site Suitability

58. The land is gently contoured, with existing access from a legal road and proximity to power and telecom services. Furthermore, the site is free from significant natural hazards, as confirmed by council GIS layers.
59. No outstanding natural landscapes or ecological areas are identified on-site, and the land is not classified as highly productive under NPS-HPL definitions.

Soils

60. The soils on the site are Class 4, which are not considered to be highly productive.

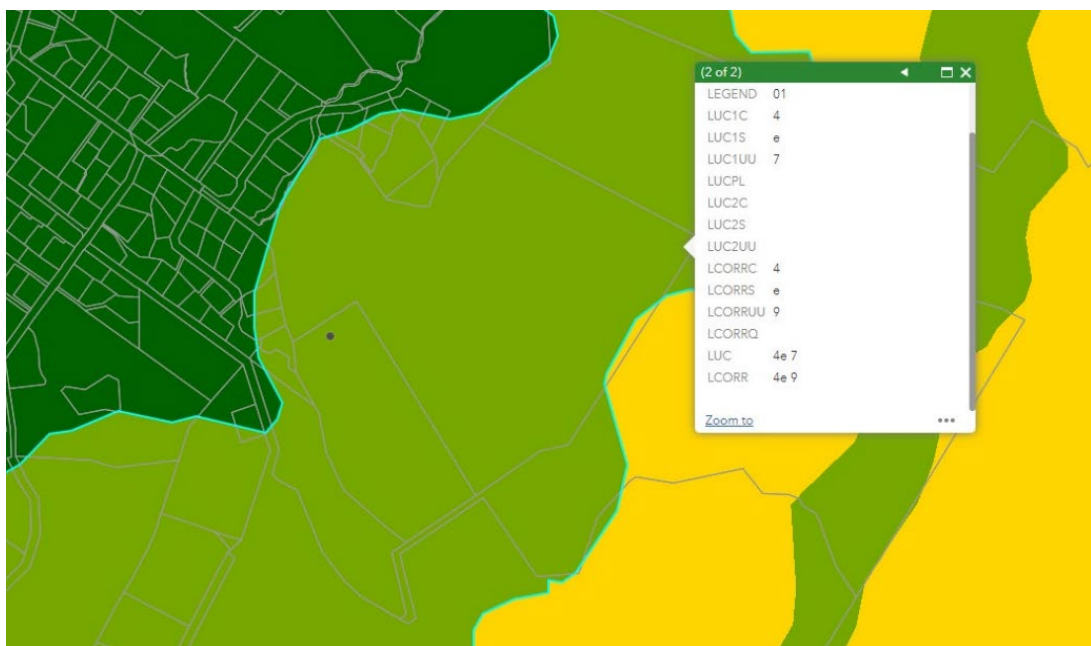


Figure 5: Land Use Capability Map (Source: Far North Maps)

Natural Hazards

61. The land is subject to some minor river flooding hazards identified around the periphery and through the middle of the larger site. These may be set aside and made into a feature of the landholdings with access made available to the public, potentially as a reserve (see indicative scheme in **Attachment A**).

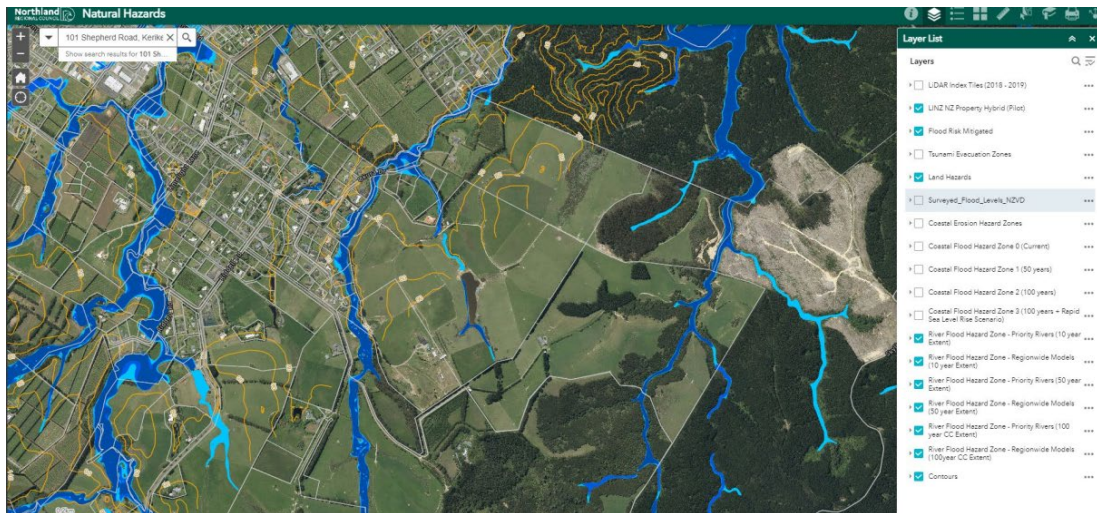


Figure 6: Natural hazards map (Source: Northland Regional Council)

Biodiversity

62. There are no known wetlands on the property or in the surrounds. The site is in the Kiwi Present Zone.

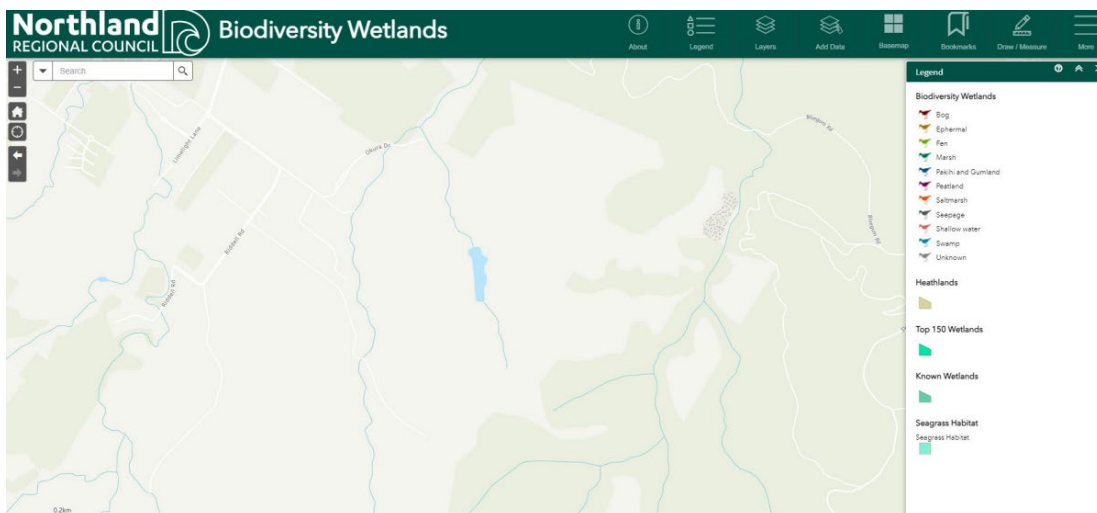


Figure 7: Biodiversity wetlands map (Source: Northland Regional Council)

Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (HAIL)

63. There are no sites identified being subject to HAIL.

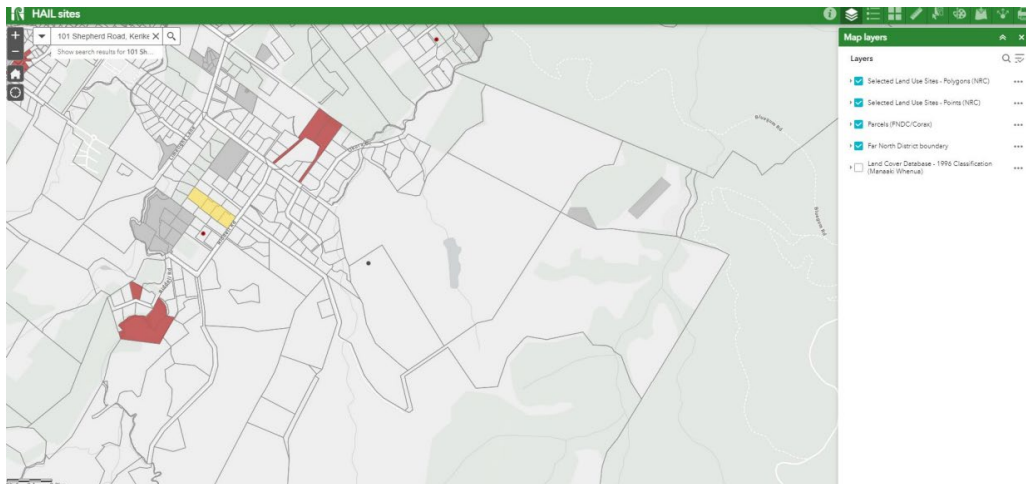


Figure 8: HAIL map (Source: Far North Maps)

Council Services

64. The property is in close proximity to the Kerikeri wastewater treatment plant. The main trunk of the Kerikeri wastewater treatment plant runs through the larger land holding. As mentioned earlier in my evidence, rezoning these landholdings Rural Residential through the PDP process creates an opportunity at a later juncture to look at rezoning this land in an urban capacity.

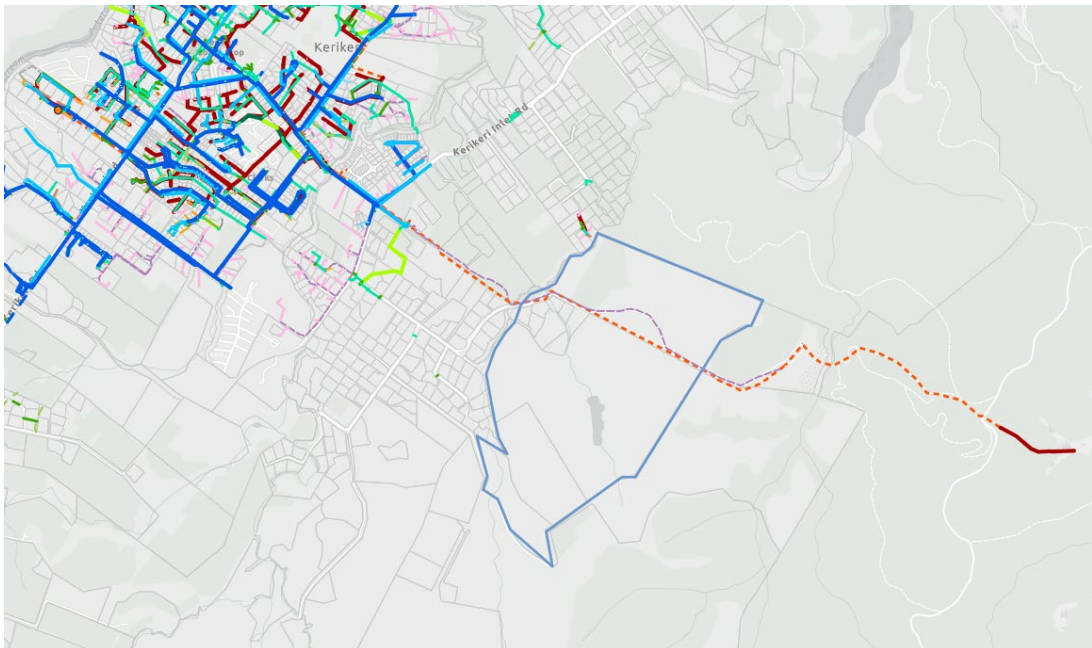


Figure 9: Water Services map (Source: Far North Maps)

Transport

65. The landholding is currently subject to low volume traffic numbers. There is also the potential to upgrade some of the existing roads and establish a connector road out to State Highway 10 near the top of Bulls Gorge, which was signalled as part of the 2007 Kerikeri Waipapa Structure Plan. This future road could provide another route into

Kerikeri Township, taking the pressure off Kerikeri Road. The landholding is also within a 2km walk of Kerikeri Primary, Kerikeri High School and the Kerikeri Town centre.

66. At time of development, traffic studies can be undertaken to ensure that effects are commensurate with the local roading environment.

Yield

67. The total size of landholdings is approximately 100 hectares. If 30% of the landholding is removed for future roading and reserves, the developable area left is approximately 70 hectares. The PDP subdivision rules for the Rural Residential zone provide for minimum lots size 4,000m² as a Controlled activity and 2,000m² as a Discretionary activity. That equates to an additional 175 lots as a controlled activity or 350 lots as a discretionary activity.
68. Commentary on the Spatial Plan above highlights some of its inadequacies and the need to provide options to ensure that sufficient land is provided to accommodate growth. I believe that an additional 100 hectares of Rural Residential zoned land, in the right location, can contribute positively to the overall land yield required to service growth by providing a supply of detached dwellings that aligns with existing market preferences.

General Servicing

69. In terms of water, this is expected to be provided by water tank, as is usual in a peri-urban environment. This can be provided at time of development for potable and fire-fighting needs.
70. In terms of stormwater, the careful management of this would be considered at time of subdivision for increases in impervious surfaces associated with roads. At the time of development, further mitigation may be imposed where dwellings exceed the engineering and district plan standards.
71. In terms of wastewater, the proposal seeks to rely on the subdivision standards set out by the PDP. Therefore, we rely on Council's justification that these sizes are sufficient for on-site treatment and management of wastewater.
72. In terms of power and telecoms, these would be provided through the subdivision process to the boundary of each allotment.

FURTHER SUBMISSIONS

73. The proposed zone change has been met with support by way of two further submissions¹⁵.

¹⁵ Further submissions FS172.399 (Audrey Campbell-Frear) and FS343.001 (Okura Trust)

SECTION 32AA EVALUATION

74. I believe that the rezoning request is appropriate and necessary considering inadequacies of the Spatial Plan in delivering sufficient and realistic growth options within the existing (and proposed) urban framework. Its ambitious targets for urban intensification are not fully supported by market realities or funded infrastructure, which may lead to a potential shortfall in housing supply, particularly for preferred detached typologies.
75. The proposed rezoning is appropriate as it provides a pragmatic solution to meet this demand, utilising a site that is adjacent to existing Rural Residential zoned land, is not highly productive, and strategically located near the Kerikeri wastewater treatment plant for future reticulation.

Efficiency and Effectiveness

76. The rezoning sought through the GGHL submission promotes efficiency by providing a housing supply that can be delivered with on-site servicing in the short-to-medium term, avoiding immediate reliance on currently unfunded and constrained reticulated urban infrastructure. This allows Council time to plan and fund necessary upgrades to the Kerikeri wastewater treatment plant and other networks. Further, rezoning the landholding to a higher and better use is an efficient use of marginal land.
77. The rezoning sought through the GGHL submission is effective in addressing the apparent mismatch between housing preferences (demand for detached dwellings) and the current feasible supply within the urban area. Rezoning further land on the peri-urban periphery provides a realistic pathway for growth and retains the ability to be upzoned at a later juncture when and if demand requires it, or it is infrastructure ready.

Costs/Benefits

78. Benefits of the proposed rezoning include:
- Utilising marginal Class 4 soils, which are not considered highly productive, for a higher and better use.
 - Reducing pressure on highly productive horticultural land in and around Kerikeri for residential use.
 - Providing immediate housing supply, addressing market demand for detached dwellings.
 - Supporting a peri-urban lifestyle close to Kerikeri amenities.
 - Reducing pressure on Councils urban infrastructure, which at this juncture is near capacity and largely unfunded to support the Spatial Plan approach.

79. Costs of the proposed rezoning include:

- The potential for increased stormwater runoff if not managed on-site.
- The potential for cumulative effects from on-site wastewater systems if not properly managed.
- The potential for increased car dependency compared to urban intensification.

Risk of Acting or not Acting

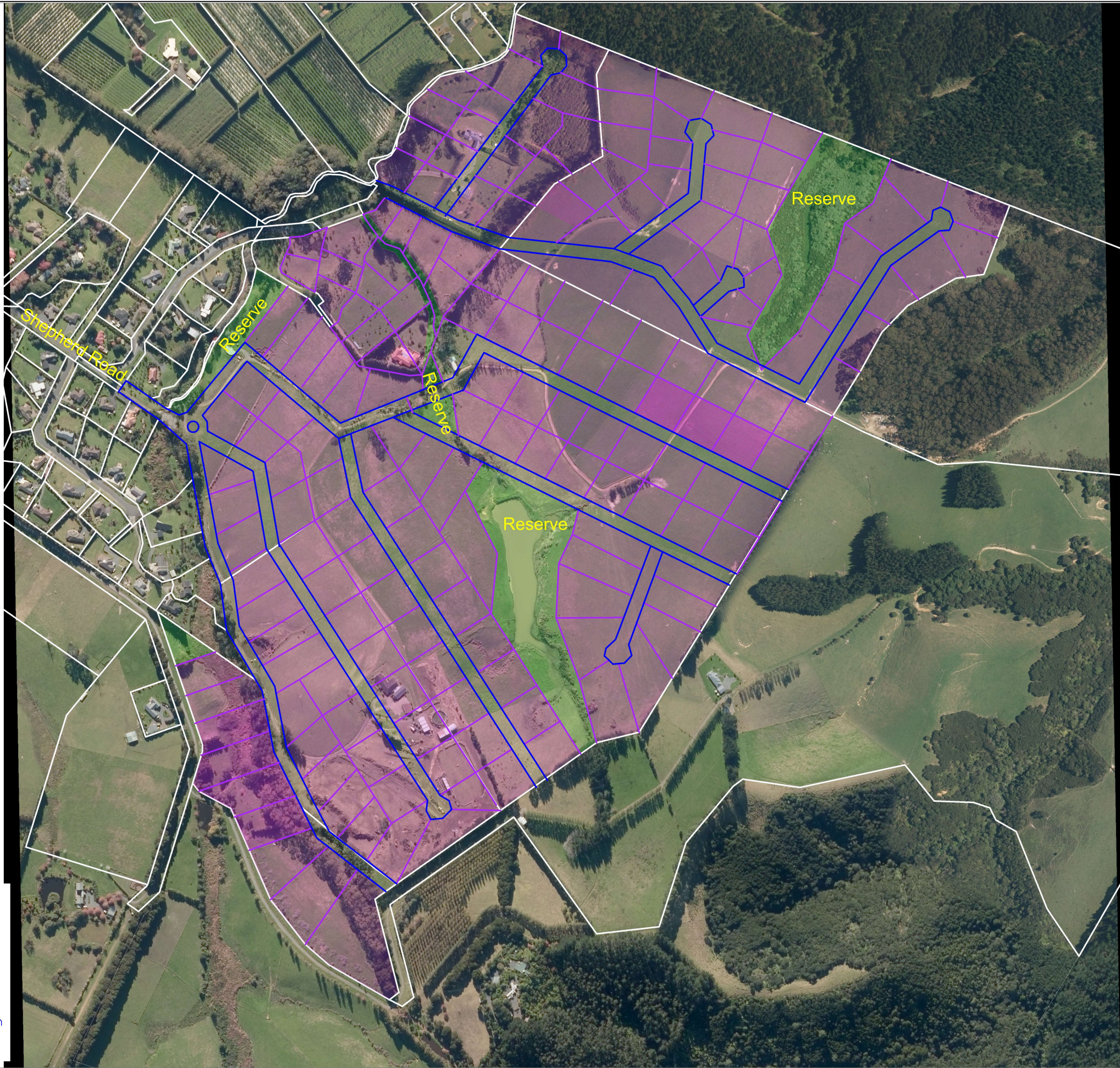
80. There is a risk of underutilizing land that is already adjacent to existing Rural Residential areas, missing an opportunity to manage growth proactively.

CONCLUSION

81. I believe the proposed zone change from Rural Production to Rural Residential promoted through the GGHL submission is appropriate for the reasons expressed in my evidence. In summary it aligns with higher order documents and offers an efficient and effective response to the identified inadequacies of the Spatial Plan, particularly concerning housing supply, market preferences, and critical infrastructure constraints.

82. The benefits of providing immediate, market-responsive housing options and strategically signalling the potential for future urban development outweigh any potential costs, especially given the non-productive nature of the land and lack of constraints.

Attachment A – Indicative Scheme Plan



NOTES
Minimum Lot size - >4000m²
Controlled activity - 175 Lots

This drawing has been prepared solely for the use intended by the client stated on the plan, and must not be used for any other purpose. BOI Survey Ltd accepts no responsibility for this plan, or any data contained on this plan, to be used for any other purpose

| Rev. | Reason For Issue or Amendment | Date | Drawn | Checked | Surveyed |
|------|-------------------------------|----------|-------|---------|----------|
| A | Scheme Plan Shepherd Road | 29/05/25 | TW | | |
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| | | | | | |
| | | | | | |



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|-----------------------------|--|-----------------|----------|----------------|-------------|
| PROPOSED SUBDIVISION LAYOUT | | JOB NO: | 5045 | Scale: | 1:1000 @ A3 |
| CLIENT: | | Level Datum: | N/A | Origin: | - |
| | | Drawing Number: | 5045-002 | Revision: | A |
| | | | | Co-ord System: | NZGD 2000 |
| | | | | Sheet: | 1 of 1 |



KERIKERI
TOWNSHIP

SHEPHERD ROAD

NOTES
Minimum Lot size - >4000m²
Controlled activity - 175 Lots

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| Rev. | Reason For Issue or Amendment | Date | Drawn | Checked | Surveyed |
|------|-------------------------------|----------|-------|---------|----------|
| A | Scheme Plan Shepherd Road | 29/05/25 | TW | | |
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BOI SURVEY LTD
55B Shepherd Road
Kerikeri 0230

e: Tony@boisurvey.co.nz

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|-----------------------------|----------|
| PROPOSED SUBDIVISION LAYOUT | |
| OVERALL PLAN | |
| CLIENT: | TEIXEIRA |

| | | | | |
|-----------------|----------|-----------|--------|-----------------------------|
| JOB NO: | 5045 | | Scale: | 1:1000 @ A3 |
| Level Datum: | N/A | Origin: | - | Co-ord System: NZGD 2000 |
| Drawing Number: | 5045-003 | Revision: | A | Sheet: 1 of 1 |