

**BEFORE THE PROPOSED FAR NORTH DISTRICT PLAN INDEPENDENT HEARINGS
PANEL**

IN THE MATTER: of the Resource Management Act
1991

AND

IN THE MATTER: Submission on the Proposed Far
North District Plan

SUBMITTER: Ken Lewis Limited
Submission 009/1-3

HEARING TOPIC: 15C – Rezoning General

**STATEMENT OF EVIDENCE BY SARAH JEAN ROBSON
ON BEHALF OF KEN LEWIS LIMITED
DONALD ROAD AND ALLEN BELL DRIVE, KAITAIA
8 JUNE 2025**

1. EXECUTIVE SUMMARY

- 1.1. This evidence has been prepared on behalf of Ken Lewis Limited (KLL) to address their submission to the Proposed Far North District Plan (PDP). Submission 009/1-3 seeks to rezone a 62-hectare site at Donald Road and Allen Bell Drive in Kaitaia from Rural Residential to General Residential.
- 1.2. The site is in close proximity to Kaitaia Township and the commercial centre to the north of Kaitaia Township, and has existing transport linkages to both, including pedestrian, cycling and public transportation. The site adjoins land proposed to be zoned General Residential to both the north and the west and represents a logical, practical and efficient area for medium-density residential expansion in Kaitaia. The site can connect to the existing infrastructure networks that service the existing urban environment.
- 1.3. There are significant flooding constraints applying to large portions of land currently proposed to be zoned General Residential in Kaitaia and the rezoning of the site at Donald Road and Allen Bell Drive presents an opportunity provide for development where no significant natural hazards create risk to people or property.
- 1.4. This evidence considers the strategic direction of the PDP, objectives and policies of the Rural Residential and General Residential Zones, higher order documents in the resource management framework, effects anticipated by the potential rezoning of the site at Donald Road and Allen Bell Drive and considers the costs and benefits under Section 32AA of the Resource Management Act 1991 (RMA). In summary, the proposed rezoning generally aligns with and will not be contrary to all higher order documents and provisions of the PDP, and is therefore the most appropriate option to achieve the purpose of the RMA.

2. INTRODUCTION

- 2.1. My name is Sarah Jean Robson, and I hold the qualification of Bachelor of Planning from the University of Auckland. I am an Intermediate Member of the New Zealand Planning Institute and am currently employed by CKL NZ Limited as a Principal Planner. I have fifteen years' experience in the field of planning and resource management. From November 2010 until April 2015, I was employed as a Policy Planner at the Far North District Council.

- 2.2. I have complied with the Environment Court's Expert Witness Code of Conduct (set out in the Court's 2014 Practice Note) in the preparation of this evidence and I agree to comply with it while giving oral evidence at future hearings. Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. To the best of my knowledge, I have not omitted to consider any material facts known to me that might alter or detract from the opinions expressed in this evidence.

3. SCOPE OF EVIDENCE

- 3.1. This evidence provides a planning assessment in relation to the submission by KLL to rezone Part Lot 1 DP 173052 located along Donald Road and Allen Bell Drive in Kaitia ("the subject site"). The subject site is demonstrated in the plan attached as Annexure 1.
- 3.2. The submission by KLL requested that the proposed zoning of the subject site be amended from Rural Residential to General Residential in the PDP. My evidence addresses:
- a) Site context;
 - b) Reasons for the rezoning submission;
 - c) Supporting reports and assessments;
 - d) Strategic direction and PDP consistency;
 - e) Higher order direction;
 - f) Site suitability and effects of rezoning;
 - g) Consultation;
 - h) Section 32AA assessment; and
 - i) The relief sought.
- 3.3. Consideration has been given to the PDP provisions, the Section 32 Report and relevant supporting documents. Specialist assessments have been prepared by Michael Hall (Transport Engineer), Ash Vodnala (Civil Engineer), Bronwyn Rhynd (Environmental Engineer) and Tim Heath (Economist). Consideration has also been given to these specialist assessments.

4. SITE CONTEXT

- 4.1. The subject site is located 1km north of Kaitaia Township and 500m west of a secondary commercial growth area. It has direct road access to both areas, with pedestrian links along both Donald Road and Allen Bell Drive. The site is currently utilised for farming purposes but only a small portion of land in the western boundary of the site contain LUC Class 2 and 3 soils (being where stormwater discharges from the site).
- 4.2. The total site area is 62 hectares. The topography is steep, with elevated ridges along the east and south boundaries and deeply incised overland flow paths and streams traversing the site, discharging to both the north and west boundaries where the site adjoins Donald Road and Allen Bell Drive. The site does not contain any significant native vegetation or known archaeological, historic or cultural features.
- 4.3. There is an easement along part of the northern boundary to enable vehicle access to an existing water reservoir adjoining the site. The site adjoins numerous Residentially zoned sites to the north and west, with lots ranging in size from 650m² to 4 hectares.

5. REASONS FOR THE REZONING SUBMISSION

- 5.1. KLL's seeks to enable efficient and comprehensive development of a significantly large parcel of land that is in an optimal location for General Residential Zone density to service the future growth of Kaitaia.
- 5.2. Kaitaia Township is subject to significant flooding, which affects much of the existing Residential Zoned land (see further details in Annexure 4). The subject site is unaffected by significant natural hazards and is situated in proximity to both the Kaitaia Township and a commercial centre north of the township, and will promote safe and effective growth.
- 5.3. Infill development of a traditional residential subdivision pattern limits options for comprehensive development. The subject site is of a sufficient size that all stormwater, wastewater and roading infrastructure requirements can be provided for onsite, if required. The site adjoins existing General Residential Zoned land

along the northern and western boundaries, creating a logical and contiguous extension of Kaitaia's urban area. It has direct access to main traffic routes, including Allen Bell Drive and Donald Road, providing practical urban connectivity.

- 5.4. The site represents a significant future urban growth opportunity for Kaitaia, with physical characteristics (e.g. rolling topography and elevation) conducive to subdivision and residential development. Rezoning to General Residential enables more efficient urban subdivision than what is permitted under the more restrictive Rural Residential standards.
- 5.5. The land's elevation supports gravity-based reticulation for council's three waters infrastructure. Proximity to existing infrastructure makes service connection viable, particularly given known upgrades occurring in the surrounding environment.
- 5.6. There is limited market evidence to support mixed-use or apartment living models in Kaitaia (as encouraged under PDP's mixed-use zone), making greenfield residential expansion more viable and realistic. The rezoning supports a responsive and flexible growth strategy, better aligned with actual housing demand and community needs while ensuring a sufficient supply of residential land that will contribute to greater affordability and choice for the Kaitaia community.

6. SUPPORTING REPORTS AND ASSESSMENTS

- 6.1. KLL has procured specialist assessment to consider the suitability of the site for rezoning. A summary of each report is provided below.
- 6.2. Traffic Assessment Report (Annexure 2)
- 6.3. A Traffic Assessment Report has been prepared and provided in Annexure 2. This assessment is based on approximately 500 dwellings being built on the potentially rezoned land resulting in over 3,304 vehicles per day. The report concludes that the surrounding road network can accommodate potential traffic volumes resulting from the proposed rezoning, subject to upgrades on a one-lane bridge along Donald Road and the intersection of Allen Bell Drive and Donald

Road. It further concludes that there are suitable primary connection points to support a new loop road through the site that can service a higher density than what could be achieved under the proposed zone.

6.4. Infrastructure Assessment Report (Annexure 3)

6.5. The Infrastructure Assessment Report provided in Annexure 3 considers the capacity and suitability of the existing stormwater, wastewater and water supply networks to determine whether rezoning of the subject site is viable. The assessment assumed approximately 500 dwellings within the site, as anticipated by the potential rezoning, accounting for natural features and topography of the site. Given the recent and planned upgrades in the wider environment, the report concludes that the potential density anticipated by the proposed rezoning can be accommodated within the existing three waters network, subject to detailed hydrological assessment to be provided at the resource consenting stage. The site location enables connection into the existing reticulated network and should targeted upgrades be required following detailed assessment, these can be required and managed through a consenting process to achieve the requirements of the Far North District Council's (FNDC) Engineering Code of Practice.

6.6. Stormwater and Flood Management Assessment (Annexure 4)

6.7. An assessment of the opportunities and constraints regarding stormwater and flood management has been provided in Annexure 4. This assessment includes an overview of the flooding hazards affecting the wider Kaitaia area and potential options to develop the subject site to manage stormwater and water treatment on the site, should the site be rezoned. The assessment provides treatment and conveyance options that have been considered in preparation of a Masterplan (Annexure 6) to demonstrate how the site can function if high density development is enabled through rezoning of the site. The assessment identifies that the proposed rezoning is a key opportunity for Kaitaia, given the high elevation of the site, which avoids flood risk for future residential development. The report also concludes that a feasible and comprehensive stormwater management strategy can be successfully implemented for the site to accommodate the proposed medium-density residential zone change that is sought by KLL.

6.8. Economic Assessment (Annexure 5)

6.9. An Economic Assessment is provided in Annexure 5. This evaluates the economic rationale and merits of the proposed rezoning and concludes that the proposed rezoning of the site to General Residential is 'necessary, appropriate and economically efficient'. The assessment identifies that the projected development capacity of the current PDP zoning for Kaitaia is severely constrained, and it is anticipated that there will be a shortfall in residential capacity to provide for the future needs of Kaitaia. The assessment also outlines potential costs, specifically identifying increased need for infrastructure upgrades and the loss of rural residential land (and therefore opportunities for small-scale farming activities) in the periphery of the township, however the report concludes that the proposed rezoning would 'provide net economic benefits with no consequential economic costs.'

6.10. Masterplan (Annexure 6)

6.11. The subject site contains several natural streams and overland flow paths, and areas of steep topography. These features warranted the preparation of a Masterplan to demonstrate how the site could potential be developed should the proposed rezoning occur. The Masterplan (provided in Annexure 6) considers the existing terrain, natural features and access points to enable development of the site. The Masterplan provides a loop road through the site, providing access to the gentler topography along the northern and eastern boundaries of the site. A green corridor is provided through the centre of the site, providing a planted buffer either side of the stream network, allowing the creation of stormwater treatment devices and reserves. Pedestrian and cycling links are provided for to enhance connectivity within the site. The Masterplan includes a context plan demonstrating how the site is situated in relation to the existing commercial and residential areas of Kaitaia.

7. STRATEGIC DIRECTION AND PDP CONSISTENCY

7.1. The proposed rezoning of the subject site has been assessed against the strategic direction of the PDP, and the objectives and policies of the currently proposed zone and the zoning requested in the submission.

7.2. Historic and Cultural Wellbeing Objectives

SD-CP-O1
Te Tiriti o Waitangi partnerships support iwi and hapū to deliver on the social, economic, environmental and cultural wellbeing outcomes for tangata whenua.
The subject site does not contain any cultural or historical features; therefore the proposed rezoning will not compromise this objective and will enable opportunities for comprehensive development of land that will result in quality outcomes for the built and natural environment.
SD-CP-O2
Te ao māori, tikanga māori and tangata whenua as kaitiaki, embedded in and integral to decision making.
No feedback on the proposal has been received by mana whenua, however as demonstrated in Annexure 4, the natural features of the site can be protected and enhanced through a higher density development which will contribute to overall environmental benefits, including water quality treatment prior to discharge to a natural stream. The potential stormwater and treatment options outline in Annexure 4 align with the principles of kaitiakitanga.
SD-CP-O3
The district's diverse cultures and communities are celebrated and cultural heritage recognised.
There are no known cultural or historical features on the site and the proposed rezoning provides for development of the site in a way that can contribute to a sense of place and provide for diversification of living opportunities in Kaitaia.
SD-CP-O4
The district's historic heritage is identified and managed to ensure its long-term protection for current and future generations.
There are no known cultural or historical features on the site.
SD-CP-O5
Te Tiriti o Waitangi partnerships support iwi and hapū to deliver on the social, economic, environmental and cultural wellbeing outcomes for tangata whenua.
No feedback on the proposal has been received by mana whenua, however the proposed rezoning will not hinder tangata whenua from achieving their social, economic, environmental and cultural wellbeing outcomes.

7.3. Social Prosperity Objectives

SD-SP-O1
Community wellbeing is heightened by a sense of place.
The site is well positioned in relation to Kaitaia Township and the commercial growth cell to the north, providing for a variety of transportation options for future residents, contributing to the existing sense of place for both. The unique characteristics and size of the site allow for a comprehensive residential development that can incorporate green corridors and public spaces that will heighten the sense of place.
SD-SP-O2
Development of initiatives that will support the wellbeing of Tangata Whenua, in partnership with Iwi and hapū.
No feedback on the proposal has been received by mana whenua, however the proposed rezoning will not hinder tangata whenua from achieving their wellbeing outcomes.
SD-SP-O3
Encourage opportunities for fulfilment of the community's cultural, social, environmental, and economic wellbeing.
The proposed rezoning will enable increased residential supply within proximity of two commercial hubs, supporting compact commercial and residential growth, and

enabling choice of transportation modes. The site contains degraded streams due to farming activities occurring both currently and in the past. The size of the landholding will enable the site to be developed comprehensively and ensure that natural features are protected and enhanced while providing for management of effects related to stormwater discharge. A loop road has been proposed through the site, which would provide an opportunity for future extension of the public bus network provide ease of access to both commercial hubs.
SD-SP-O4 Promotion of communities and places that will meet the needs for not only the present population but future generations which are adaptive to climate change.
The site is located outside of the floodplain that affects a significant portion of the General Residential Zoned land in Kaitaia. It provides for residential development in proximity of the commercial centres while ensuring that future dwellings and residents are unaffected by natural hazards and provides potential to reduce risk to people and property. It provides for retreat from residentially zoned land compromised by significant flooding, providing resilience for the future of Kaitaia as a whole. The proposed Rural Residential Zoning will enable development of 3,000m ² lots, which may provide for the needs of the community today, but the existing zoning has the potential to compromise growth in the future. Rural lifestyle blocks can limit quality, comprehensive design in the future by fragmenting land without providing urban standard roads and futureproofing infrastructure servicing. The site is unique in its location and size, enabling a large-scale residential development that can be designed comprehensively to meet the needs of the population today and into the future.

7.4. Economic Prosperity Objectives

SD-EP-O1 A high-earning diverse local economy which is sustainable and resilient to economic downturns, with the district's Māori economy making a significant contribution.
While Kaitaia is a rural township in the Far North, it is considered a key growth area in the FNDC Infrastructure Strategy and there are current and planned upgrades to ensure infrastructure resilience for future growth of the township. The Economic Assessment in Annexure 5 states that it would be 'economically inefficient to not improve the functioning of these smaller urban areas and incorporate new development that generates the economic benefits and efficiencies available from urban growth'.
SD-EP-O2 Existing industries and enterprises are supported and continue to prosper under volatile and changing economic conditions.
The proposed rezoning will not impact on the operation of existing industries and primary production in the wider environment. It has the potential to encourage growth in Kaitaia which supports economic growth and increased workforce to support this.
SD-EP-O3 Development and retention of highly motivated, educated and skilled people in the district.
The proposed rezoning has the potential to encourage growth and sense of place within Kaitaia, providing an opportunity for high-quality development in proximity to the two commercial centres of the township. Having a sense of place will likely encourage people to stay within the community.
SD-EP-O4 People, businesses and places are connected digitally and through integrated transport networks.

<p>The subject site is located within proximity of the two commercial centres, industrial hubs and primary production activities that provide for a range of transport modes. The site is located near existing urban development therefore quality communication networks can easily be connected for future development.</p>
<p>SD-EP-O5</p> <p>A district economy that is responsive, resilient and adaptive to the financial costs of a changing climate.</p>
<p>The increasing rate and intensity of natural disasters has a significant impact on insurance rates and availability, which can impact on the wider economic health of a community. As Kaitaia grows, it is likely there will be increased infill development of inappropriate zoned residential land if there are no opportunities elsewhere in the wider environment. Increasing density in an urban area affected by significant flood risk is contrary to this objective. The proposed rezoning of this site provides for greater residential land supply where the risk of natural disasters is not prevalent and is considered to be strongly aligned with this objective;</p>

7.5. Urban Form and Development Objectives

<p>SD-UFD-01</p> <p>The wellbeing of people who live in and visit towns in the Far North is considered first when it comes to planning places and spaces.</p>
<p>The proposed rezoning will provide opportunities for choice for housing and transportation. The increase in residentially zoned land in proximity to Kaitaia Township and the northern commercial hub will provide for the wellbeing of people living and visiting Kaitaia. While the Masterplan is only indicative, it outlines the potential opportunity to provide additional supply of residential land while enhancing degraded natural features and provide onsite treatment and management of stormwater.</p>
<p>SD-UFD-02</p> <p>Urban growth and development consolidated around existing reticulated networks within town centres, supporting a more compact urban form, affordability and providing for a mix of housing typologies.</p>
<p>The site is situated in walking and cycling distance from two commercial hubs in Kaitaia. It is able to connect into the existing reticulated system as outlined in the Infrastructure Assessment Report in Annexure 3. The topography of the site will likely result in a mix of housing types, with high density in areas with gentle topography and larger residential blocks where topography is steeper.</p>
<p>SD-UFD-03</p> <p>Adequate development infrastructure in place or planned to meet the anticipated demands for housing and business activities.</p>
<p>As concluded in the Infrastructure Assessment Report in Annexure 3, the site is able to connect into the existing reticulated infrastructure network, and it is anticipated there will be sufficient capacity to service the site. If targeted upgrades are warranted, these can be managed through development agreements or required as part of the resource consenting approval.</p>
<p>SD-UFD-04</p> <p>Urban growth and development is resilient and adaptive to the impacts from natural hazards or climate change.</p>
<p>Flooding within the site is limited to the stream edges due to the elevated topography. The site provides for the future growth of Kaitaia outside of the significant floodplain affecting the wider township. The site is of a size that stormwater can be managed onsite, avoiding the potential downstream impacts of greater impervious coverage and providing resilience and the opportunity for flood retreat.</p>

7.6. Infrastructure and Electricity Objectives

SD-IE-01
The benefits of infrastructure and renewable electricity generation activities across the district are recognised and provided for, while ensuring their adverse effects are well managed.
The proposed rezoning will not compromise the provision of infrastructure or renewable electricity generate, therefore is not contrary to this objective.
SD-IE-02
Infrastructure and renewable electricity generation activities are protected from incompatible land use, subdivision and development that may compromise their effective operation, maintenance and upgrading.
The site is not in proximity to any significant infrastructure or renewable energy activities that may result in reverse sensitivity effects. However, there is a water reservoir on the northern boundary of the site which is currently accessed via an easement over the site. There is sufficient space to ensure the ongoing access to the reservoir as demonstrated in the Masterplan provided in Annexure 6, therefore this proposed rezoning is not considered to be contrary to this objective.

7.7. Rural Environment Objectives

SD-RE-01
Primary production activities are able to operate efficiently and effectively and the contribution they make to the economic and social well-being and prosperity of the district is recognised.
The site provides a buffer to the Rural Production Zoned land to east. However, much of the Residential Zoned land on the periphery of Kaitaia adjoins the Rural Production Zone and the proposed rezoning of the site would not be inconsistent with the wider zoning pattern of Kaitaia.
SD-RE-02
Protection of highly productive land from inappropriate development to ensure its production potential for generations to come.
The site is currently leased for farming purposes but only contains a small portion of land containing high class soils. The current Rural Living Zone applied under the Operative Far North District Plan and the proposed Rural Residential Zone under the PDP indicate the land is suitable for residential use.

7.8. Environmental Prosperity Objectives

SD-EP-01
A culture of stewardship in the community that increases the district's biodiversity and environmental sustainability.
A comprehensive development of the site with higher density than what is currently enabled under the proposed Rural Residential Zone will make development more financially feasible and enable enhancement of the natural features within the site, specifically stream improvements and provision of planted green corridors.
SD-EP-02
Collaborative relationships with iwi and hapū in order to support tangata whenua to carry out their obligation and responsibility as kaitiaki.
The RMA and PDP encourage active engagement with tangata whenua. Te Rūnanga o Te Rarawa have been approached for input, but no feedback has been provided to date. Any future development of the site is expected to include engagement with Te Rarawa. The proposed rezoning is not contrary to this objective.

SD-EP-03
Active management of ecosystems to protect, maintain and increase indigenous biodiversity for future generations.
A comprehensive development of the site with higher density than what is currently enabled under the proposed Rural Residential Zone will make development more financially feasible and enable enhancement of the natural features within the site, specifically stream improvements and provision of planted green corridors.
SD-EP-04
Land use practices reverse climate change by enabling carbon storage and reducing carbon emissions.
The proposed rezoning is unlikely to have any significant impact on reversing climate change and is not contrary to this objective.
SD-EP-05
The natural character of the coastal environment and outstanding natural features and landscapes are managed to ensure their long-term protection for future generations.
The site is not within the coastal environment and does not contain any outstanding natural features or landscapes. The proposed rezoning is not contrary to this objective.
SD-EP-06
Areas of significant indigenous vegetation and significant habitats of indigenous fauna and protected for current and future generations.
The site does not contain any areas of significant indigenous vegetation or habitats. The proposed rezoning is not contrary to this objective.

7.9. General Residential Zone Objectives and Policies

GRZ-01
The General Residential zone provides a variety of densities, housing types and lot sizes that respond to: <ul style="list-style-type: none"> a. housing needs and demand; b. the adequacy and capacity of available or programmed development infrastructure; c. the amenity and character of the receiving residential environment; and d. historic heritage.
<p>The site is suitable to be zoned General Residential as it will increase land supply for residential purposes in proximity to Kaitia Township and the northern growth hub. As identified in the Economic Assessment, the existing supply of residentially zoned land will result in a shortfall of supply for the future growth of Kaitia and this site provides an opportunity to ensure there are housing options and variety for future residents of Kaitia. During a site visit to Kaitia, I also noted that much of the land zoned General Residential is already developed or utilised for non-residential activities, including educational facilities and commercial activities along the periphery of the Mixed-Use Zone boundaries. Therefore, current land use patterns and natural hazards are likely to further limit the available land for quality residential development in the future.</p> <p>As concluded by the Infrastructure Assessment Report in Annexure 3, the site is well positioned to connect into the reticulated network, and it is anticipated there will be sufficient capacity given recent and planning infrastructure upgrades in the area (with additional targeted upgrades as required). The natural features of the site will contribute to onsite amenity and the site is adjacent to existing established residential areas of a scale anticipated by the General Residential Zone. The proposed rezoning is consistent with this objective.</p>
GRZ-02

The General Residential zone consolidates urban residential development around available or programmed development infrastructure to improve the function and resilience of the receiving residential environment while reducing urban sprawl.
The proposal will increase the area of urban zoned land noticeably, being 62 hectares. As outlined in the Infrastructure Assessment Report (Annexure 3) and the Masterplan (Annexure 6), approximately 50-70 percent of the site will be developable due to natural site constraints and the potential roading network. As such, the number of additional dwellings anticipated if the site was rezoned to General Residential is approximately 500. The site is in close proximity of Kaitaia Township and the northern commercial centre. It is also able to connect the existing reticulated network and is located outside of any significant flooding hazards. The Economic Assessment in Annexure 5 has identified that there will be a shortfall in supply of dwellings for the future growth of Kaitaia under the current PDP. Therefore, I conclude that the increased urban land, resulting if the site is rezoned, is commiserate to the anticipated growth of Kaitaia, noting the constraints applied across the current General Residential Zoned land supply. The rezoning is not contrary to this objective.
GRZ-03 Non-residential activities contribute to the well-being of the community while complementing the scale, character and amenity of the General Residential zone. The proposed rezoning will not preclude non-residential activities from occurring on the site and therefore the proposal is not contrary to this objective.
GRZ-04 Land use and subdivision in the General Residential zone is supported where there is adequacy and capacity of available or programmed development infrastructure. If the site is rezoned, large scale residential development is subject to resource consent and will be restricted where sufficient infrastructure servicing cannot be provided. Should more detailed assessment of wastewater and water capacity indicate targeted infrastructure upgrades are required to service any future development of the site, the Council has sufficient mechanisms in place to require a development agreement or ensure necessary upgrades are undertaken prior to the development being occupied, via resource consent conditions. As such, it is considered the proposed rezoning is suitable for the site and will be consistent with this objective.
GRZ-05 Land use and subdivision in the General Residential zone provides communities with functional and high amenity living environments. The size of the site enables the land proposed for rezoning to be developed comprehensively, rather than adhoc which often occurs with infill development. As such, the site provides an opportunity to ensure provide a high amenity, functional and quality living environment that is in proximity to existing commercial centres, supporting growth of the community. The proposed rezoning strongly aligns with this objective.
GRZ-06 Residential communities are resilient to changes in climate and are responsive to changes in sustainable development techniques. Having a large portion of the land zoned General Residential within a significant floodplain does not provide for resilience to climate change. The PDP zoning as it stands does not align with this objective. Providing for new General Residential Zoned land outside of the floodplain provides great opportunity for retreat should it be required and provide security that there will be sufficient residential land to support the growth of Kaitaia. The proposed rezoning strongly aligns with this objective.
GRZ-P1 Enable land use and subdivision in the General Residential zone where:

<ul style="list-style-type: none"> a. there is adequacy and capacity of available or programmed development infrastructure to support it; and b. it is consistent with the scale, character and amenity anticipated in the residential environment.
<p>The site is able to connect into the existing reticulated network, and it is anticipated there will be sufficient capacity in the network, subject to a detailed hydrological assessment. Should upgrades be required, these will be provided through the resource consenting phase. The proposed Masterplan provided in Annexure 6 was prepared based on an average of 600m² lots, and it is anticipated that any future development of the site will be consistent with scale, character and amenity anticipated by the residential environment.</p>
<p>GRZ-P2</p> <p>Require all subdivision in the General Residential zone to provide the following reticulated services to the boundary of each lot:</p> <ul style="list-style-type: none"> a. telecommunications: <ul style="list-style-type: none"> i. fibre where it is available; or ii. copper where fibre is not available; b. local electricity distribution network; and c. wastewater, potable water and stormwater where they are available.
<p>The site is situated such that all network utilities and infrastructure can readily be provided for any future subdivision. The proposal is consistent with this policy.</p>
<p>GRZ-P3</p> <p>Enable multi-unit developments within the General Residential zone, including terraced housing and apartments, where there is adequacy and capacity of available or programmed development infrastructure.</p>
<p>The topography of the site is likely to result in a wide range of dwelling typologies and as concluded in the Infrastructure Assessment Report (Annexure 3) the site can connect the existing network, and it is anticipated that there is sufficient capacity to service a higher density than what is proposed under the PDP currently. The proposal is not contrary to this policy.</p>
<p>GRZ-P4</p> <p>Enable non-residential activities that:</p> <ul style="list-style-type: none"> a. do not detract from the vitality and viability of the Mixed Use zone; b. support the social and economic well-being of the community; c. are of a residential scale; and d. are consistent with the scale, character and amenity of the General Residential zone.
<p>The proposed rezoning will not preclude non-residential activities from occurring on the site, therefore the proposal is not contrary to this policy.</p>
<p>GRZ-P5</p> <p>Provide for retirement villages where they:</p> <ul style="list-style-type: none"> a. compliment the character and amenity values of the surrounding area; b. contribute to the diverse needs of the community; c. do not adversely affect road safety or the efficiency of the transport network; and d. can be serviced by adequate development infrastructure.
<p>The proposed rezoning will not preclude retirement villages from occurring on the site, therefore the proposal is not contrary to this policy.</p>
<p>GRZ-P6</p> <p>Encourage and support the use of on-site water storage to enable sustainable and efficient use of water resources.</p>
<p>The size of the site enables all stormwater to be managed onsite via communal systems that provide water treatment as well.</p>
<p>GRZ-P7</p>

Encourage energy efficient design and the use of small-scale renewable electricity generation in the construction of residential development.
The proposed rezoning will not preclude the use of renewable energy, therefore the proposal is not contrary to this policy.
<p>GRZ-P8</p> <p>Manage land use and subdivision to address the effects of the activity requiring resource consent, including (but not limited to) consideration of the following matters where relevant to the application:</p> <p>consistency with the scale, design, amenity and character of the residential environment;</p> <ul style="list-style-type: none"> a. the location, scale and design of buildings or structures, potential for shadowing and visual dominance; b. for residential activities: <ul style="list-style-type: none"> i. provision for outdoor living space; ii. privacy for adjoining sites; iii. access to sunlight; c. for non-residential activities: <ul style="list-style-type: none"> i. scale and compatibility with residential activities ii. hours of operation d. at zone interfaces, any setbacks, fencing, screening or landscaping required to address potential conflicts; e. the adequacy and capacity of available or programmed development infrastructure to accommodate the proposed activity, including: <ul style="list-style-type: none"> i. opportunities for low impact design principles ii. ability of the site to address stormwater and soakage; f. managing natural hazards; and g. any historical, spiritual, or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6. <p>The site can be designed to address best practice urban design guidelines and given that it would be a greenfield development, the potential for high-quality design is enhanced. The site-specific features and size of the land parcel lend themselves to providing low impact stormwater management and treatment, mitigating any effects of residential development. There are no known cultural or historical features or values associated with the site. Overall, the proposed rezoning is considered to be consistent with this policy.</p>

7.10. Rural Residential Zone Objectives and Policies

<p>RRZ-O1</p> <p>The Rural Residential zone is used predominantly for rural residential activities and small scale farming activities that are compatible with the rural character and amenity of the zone.</p>
<p>The site currently operates as a farm block, only a small portion of the site contains highly productive soils and is positioned between the Rural Production Zone and the General Residential Zone, providing a buffer between potentially incompatible zones. Given the existing rural character of the site, the current proposed zoning is consistent with this objective. The Economic Assessment in Annexure 5 identifies the loss of small-scale farming activity potential resulting from the proposed rezoning, however this is considered minimal given the lack of highly productive soils. As such, the current zoning is consistent with this objective.</p>
<p>RRZ-O2</p> <p>The predominant character and amenity of the Rural Residential zone is maintained and enhanced, which includes:</p> <ul style="list-style-type: none"> a. peri-urban scale residential activities; b. small-scale farming activities with limited buildings and structures;

<ul style="list-style-type: none"> c. smaller lot sizes than anticipated in the Rural Production or Rural Lifestyle zones; and d. a diverse range of rural residential environments reflecting the character and amenity of the adjacent urban area.
<p>The site is well suited for pre-urban scale residential activities and small-scale farming activities. The current proposed zoning is consistent with this objective.</p>
<p>RRZ-O3</p> <p>The Rural Residential zone helps meet the demand for growth around urban centres while ensuring the ability of the land to be rezoned for urban development in the future is not compromised.</p>
<p>Given that much of Kaitiaia zoned General Residential is subject to significant flooding and already developed, applying the Rural Residential Zone to this site has the potential to compromise the ability for the land to be used effectively for quality urban development in the future if rezoned. Smaller lifestyle blocks of around 3,000m² can be further subdivided, however logical subdivision patterns that futureproof public roading and infrastructure provision for development in the future can be compromised by rural lifestyle development. A large-scale residential development that is designed comprehensively is likely to be more financially viable than larger lifestyle blocks, ensuring onsite stormwater treatment and management is provided. The proximity of the site to the Town Centre and northern commercial hub, the lack of natural hazards affecting the land and its ability to connect well into the infrastructure and roading networks indicates the land would likely be rezoned at some point in the future therefore it is considered the current proposed zoning of the site is contrary to this objective.</p>
<p>RRZ-O4</p> <p>Land use and subdivision in the Rural Residential zone:</p> <ul style="list-style-type: none"> a. maintains rural residential character and amenity values; b. supports a range of rural residential and small-scale farming activities; and c. is managed to control any reverse sensitivity issues that may occur within the zone or at the zone interface.
<p>The site currently operates as a farm block; however, only a small corner of the site contains highly productive soils, and the site is positioned between the Rural Production Zone and the General Residential Zone, providing a buffer between potentially incompatible zones. Given the existing rural character of the site, the current proposed zoning is consistent with this objective.</p>
<p>RRZ-P1</p> <p>Enable activities that will not compromise the role, function and predominant character and amenity of the Rural Residential zone, while ensuring their design, scale and intensity is appropriate, including:</p> <ul style="list-style-type: none"> a. rural residential activities; b. small-scale farming activities; c. home business activities; d. visitor accommodation; and e. small-scale education facilities.
<p>The current proposed zoning will not compromise any of the land uses listed in RRZ-P1 (a)-(e) and these therefore not contrary to this policy.</p>
<p>RRZ-P2</p> <p>Avoid activities that are incompatible with the role, function and predominant character and amenity of the Rural Residential zone including:</p> <ul style="list-style-type: none"> a. activities that are contrary to the density anticipated for the Rural Residential zone; b. primary production activities, such as intensive indoor primary production or rural industry, that generate adverse amenity effects that are incompatible with rural residential activities; and c. commercial or industrial activities that are more appropriately located in an urban zone or a Settlement zone.

The current proposed zoning will not compromise any of the land uses listed in RRZ-P2 (a)-(c) and these therefore not contrary to this policy.
<p>RRZ-P3</p> <p>Avoid where possible, or otherwise mitigate, reverse sensitivity effects from sensitive and other non-productive activities on primary production activities in adjacent Rural Production zones and Horticulture zones.</p> <p>The site currently operates as a farm block, however only a small corner of the site contains highly productive soils and is positioned between the Rural Production Zone and the General Residential Zone, providing a buffer between potentially incompatible zones. Given the existing rural character of the site, the current proposed zoning is consistent with this policy.</p>
<p>RRZ-P4</p> <p>Require all subdivision in the Rural Residential zone to provide the following reticulated services to the boundary:</p> <ul style="list-style-type: none"> a. telecommunications: <ul style="list-style-type: none"> i. fibre where it is available; ii. copper where fibre is not available; iii. copper where the area is identified for future fibre deployment. b. local electricity distribution network. <p>The site is situated such that all network utilities can readily be provided for any future subdivision. The current proposed zoning is consistent with this policy.</p>
<p>RRZ-P5</p> <p>Manage land use and subdivision to address the effects of the activity requiring resource consent, including (but not limited to) consideration of the following matters where relevant to the application:</p> <ul style="list-style-type: none"> a. consistency with the scale and character of the rural residential environment; b. location, scale and design of buildings or structures; c. at zone interfaces: <ul style="list-style-type: none"> i. any setbacks, fencing, screening or landscaping required to address potential conflicts; ii. the extent to which adverse effects on adjoining or surrounding sites are mitigated and internalised within the site as far as practicable; d. the capacity of the site to cater for on-site infrastructure associated with the proposed activity; e. the adequacy of roading infrastructure to service the proposed activity; f. managing natural hazards; g. any adverse effects on historic heritage and cultural values, natural features and landscapes or indigenous biodiversity; and h. any historical, spiritual, or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6. <p>The site can be designed to address best practice rural residential design, providing for onsite servicing and a range of land use activities that do not create reverse sensitivity effects. There are no known cultural or historical features or values associated with the site, and natural hazards are localised to stream edges and can be managed to avoid adverse effects. Overall, the current proposed zoning is considered to be consistent with this policy.</p>

7.11. Overall, the subject site generally aligns with the objectives and policies of both the Rural Residential and General Residential Zones. However, the current proposed zoning (Rural Residential) is contrary to Objective RRZ-03 as it has the potential to compromise the long-term future needs of the community to provide urban development in an appropriate location, considering the natural hazard constraints affecting the wider Kaitia area. In addition, the proposal to rezone

the subject site to General Residential strongly aligns with Objective GRZ-06, providing for climate resilience/adaptation and futureproofing the economic and social wellbeing of Kaitaia residents in the growing risks that climate change pose, particularly significant flooding risks. As such, the General Residential Zone is more appropriately applied to this site to achieve the objectives and policies of the PDP.

8. HIGHER ORDER DIRECTION

8.1. The proposed rezoning of the subject site has been assessed against all relevant higher order documents, including the Regional Policy Statement for Northland 2016, National Policy Statements (NPS), National Environmental Standards (NES) and the Resource Management Act 1991.

8.2. Regional Policy Statement for Northland 2016

8.3. The site can be developed in a way that provides for integrated management of stormwater, and subdivision, use and development, as indicated in the Masterplan provided in Annexure 6. The site is currently utilised for farming purposes which has resulted in degraded watercourses through the site. The size and vacant nature of the site will enable higher density development that can be designed in a comprehensive manner to provide for onsite stormwater management and treatment, while also providing opportunities for enhancement of the natural environment and water quality. This is consistent with the outcomes sought by Objectives 3.1- 3.4 of the Regional Policy Statement for Northland 2015 (RPS), and associated policies.

8.4. The proposed rezoning will enable greater densities that will support urban growth in Kaitaia. The location of the site, lack of exposure to natural hazards and it's access to the reticulated infrastructure network and commercial centres will enable sustainable management of resources, particularly as the current supply of land zoned General Residential is compromised by significant flooding and as identified in the Economic Assessment in Annexure 5, there is an anticipated shortfall in residential supply based on the current zoning under the PDP. This is consistent with Objectives 3.5 and associated policies of the RPS. In addition, while the site is currently used for farming purposes it contains only a small portion of high-class soils and under the operative District Plan is zoned Rural

Lifestyle which already enables fragmentation of the land. The site currently provides a buffer between the urban and rural environments which can reduce the risk of reverse sensitivity, however General Residential Zone being adjacent to the Rural Production Zone is common within Kaitaia and the proposal would not be inconsistent with the current zoning pattern. As such, the proposed rezoning is not contrary Objective 3.5 of the RPS.

- 8.5. The subject site does not contain nor is it in proximity of existing regionally significant infrastructure, neither will the proposed rezoning affect provision of future upgrades. As such, the proposal is not contrary to Objective 3.7 and associated policies. The site can be serviced by existing infrastructure services and should there be any capacity issues targeted upgrades can be required through the design phase, therefore the proposal is consistent with Objectives 3.8 and 3.9, providing for optimisation and use of existing infrastructure and energy.
- 8.6. The General Residential Zone can be effectively applied to the to ensure that Kaitaia's built form effectively integrates development, infrastructure provision, support of employment growth, transport choice and creates a sense of space, as demonstrated in the Masterplan provided in Annexure 6. The size and location of the site provide a unique opportunity for comprehensive development that supports the regional form envisaged by Objectives 3.11 of the RPS.
- 8.7. The site does not contain any historical or cultural features. Attempt has been made to discuss the proposal with Te Rūnanga o Te Rarawa, however no feedback has been received yet. It is expected that any development of the site will include input for tangata whenua therefore the proposal is not contrary to Objectives 3.12.
- 8.8. The current supply of land zoned General Residential is significantly compromised by natural hazards, as outlined in Stormwater and Flood Management Assessment in Annexure 5. As such, the current zoning for Kaitaia in the PDP does not give effect to Objective 3.13 of the RPS, particular Policy 7.1.5(2)(d) which is aimed at mitigating hazard risk by considering retreat by relocation, removal or abandonment of structure. The current zoning pattern has not taken into account the potential need for long-term retreat from areas affected by significant flooding. The proposed rezoning will provide greater choice and opportunities for residents to live in a location not compromised by significant

flooding and avoid the associated economic and social risks associated with living within an area affected by natural hazards. The proposal strongly aligns with intended outcomes of the RPS as they relate to natural hazard risk and providing for sufficiently zoned land to manage potential retreat.

8.9. The site does not contain any natural character, outstanding natural features or landscapes, or historically significant features therefore the proposal is not contrary to Objective 3.14 and associated policies of the RPS.

8.10. Overall, the proposed rezoning aligns with the outcomes of the RPS and is not contrary to the relevant objectives and policies.

8.11. NPS for Freshwater Management 2020

8.12. The NPS for Freshwater Management 2020 (NPS-FM) was introduced to manage the health and well-being of water bodies and freshwater ecosystems, the health and needs of people and the ability for people to provide for their well-being, now and in the future. The proposed rezoning is not contrary to the objectives and policies of the NPS-FM and has the potential for enhancement of water bodies and freshwater ecosystems by providing greater financial viability for a quality, comprehensive development to occur on the site. Specifically:

- Future subdivision and development can integrate with water management to provide treatment and service the development, as indicated in the Stormwater and Flood Management Assessment in Annexure 5 and the Masterplan provided in Annexure 6, taking a whole-of-catchment approach to managing effects and improving water quality.
- Managing freshwater to improve the health and well-being of degraded waterbodies.
- The community is provided with access and enjoyment of the natural environment that is currently inaccessible and in a degraded quality.

8.13. Overall, the proposed rezoning is not contrary with NPS-FM and has the potential to provide for greater enhancement by enabling comprehensive development of the site.

8.14. NPS for Highly Productive Land 2022

- 8.15. The subject site contains a small portion of LUC 2 and 3 Class soils in the western corner near the intersection of Donald Road and Allen Bell Drive. This portion of the site is where stormwater discharges from the stream and overland flow paths. The remainder of the site does not contain any highly productive land.
- 8.16. The current zoning of the site is Rural Lifestyle and has already been identified as appropriate to be subdivided and used for residential purposes. Under Clause 3.4 of the NPS for Highly Productive Land 2022 (NPS-HPL), the site is not considered highly productive land, and the proposed rezoning will not be contrary to objective and policies of the NPS-HPL.
- 8.17. NPS for Indigenous Biodiversity 2023
- 8.18. There are no areas of indigenous vegetation on the site. The streams that traverse the site are currently in a degraded state. The proposed rezoning will not compromise any indigenous habitats and will therefore not be contrary to the objective and policies of the NPS for Indigenous Biodiversity 2023. The proposal has the potential to provide for greater enhancement by enabling comprehensive development of the site.
- 8.19. NPS on Urban Development 2020
- 8.20. As discussed in the Economic Assessment in Annexure 5, Kaitaia does not meet the criteria of an 'urban environment' under the NPS on Urban Development 2020 (NPS-UD), however the assessment notes that 'just because Kaitaia does not meet this threshold does not mean providing additional capacity at an economically efficient location would not generate economic, market and community benefits through facilitating a well-functioning urban form'. The assessment further states, 'that Kaitaia is clearly a key urban area in Far North and represents an important urban cluster of residents, employment opportunities, commercial activity, community, educational and medical facilities, visitor facilities within the district.'
- 8.21. The proposed rezoning will contribute to a well-functioning urban environment in Kaitaia, and encourage the community to provide for their social, cultural and economic well-being by providing more urban zoned land in a logical location that allows for efficient use of existing infrastructure and roading networks. The

provision of additional land zoned General Residential will improve affordability by supporting competitive land and development markets, strongly aligning with Objective 2 and Policies 1, 6 and 8 of the NPS-UD.

- 8.22. The proposed rezoning of the site will provide greater alternatives for residential activities, allowing for climate change adaptation and acknowledging the changing needs of communities and people over time, which is consistent with Objectives 4 and 8, and Policy 1 of the NPS-UD.
- 8.23. Infrastructure servicing is available to the site and there are planned upgrades through 2024-2027 which are designed to support growth and development within Kaitia. Additional upgrades to infrastructure and roading can be provided for through future resource consenting processes, therefore the proposed rezoning is consistent with Objective 8 of the NPS-UD.
- 8.24. The proposed rezoning is not contrary to any of the other objectives and policies of the NPS-UD.
- 8.25. Other NPSs
- 8.26. The NPSs for Greenhouse Gas Emission from Industrial Process Heat; Renewable Electricity Generation; Electricity Transmission and the New Zealand Coastal Policy Statement are not considered relevant to this proposed rezoning request.
- 8.27. NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
- 8.28. The site contains no known soil contamination. Any future development of the site will be subject to the standards in the NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011.
- 8.29. NES for Freshwater 2020
- 8.30. The proposed rezoning will eventually result in no farming activities operating on the site and there are no known wetlands contained within or in proximity of the site. Any future development of the site will be subject to the standards in the NES for Freshwater 2020.

8.31. Other NESs

8.32. The NESs for Commercial Forestry; Air Quality; Sources of Drinking Water; Telecommunications Facilities; Electricity Transmission Activities; Marine Aquaculture; Storing Tyres Outdoors; and Greenhouse Gas Emissions from Industrial Process Heat are not considered relevant to this proposed rezoning request.

8.33. Resource Management Act 1991

8.34. In assessing the appropriateness of the proposed rezoning of the subject site under the Resource Management Act 1991 (RMA), I have given consideration to the purpose and principles, matters of national importance, other matters and the Treaty of Waitangi in Sections 5-8.

8.35. The subject site generally does not contain highly productive soils and is currently zoned for residential purposes under the operative District Plan. By rezoning the site, the land can provide for greater residential opportunities which supports affordability and growth, takes into account the future needs of the community to provide residential land outside of known natural hazards and supports choice in transportation and employment due to the location. The site can be serviced by existing infrastructure networks and will not compromise the ability for future rural and commercial activities to occur in the wider environment. The site can be developed comprehensively to enhance and improve the natural features of the site and any adverse effects resulting from future development can be avoided, remedied and mitigated through future resource consenting processes. As such, the proposed rezoning achieves the purpose of the RMA in Section 5 by providing for the social, economic and cultural well-being of the community while ensure they can meet the reasonably foreseeable needs of future generations and that the life-supporting capacity of the air, water, soil and ecosystems are safeguarded.

8.36. Regrading Section 6, being matters of national importance, the site is not within the coastal environment, it does not contain any wetlands, and the potential development of the site will enable preservation and enhancement of the natural watercourses that traverse the site. There are no outstanding natural features or landscapes, areas of significant indigenous vegetation or habitats for indigenous fauna, nor historic heritage features or values contained within the site. The

potential rezoning of the site will not impact on the relationship Maori with the land and cultural values associated with the area, nor will it result in significant risk from natural hazards. For these reasons, I consider that the rezoning of the site sufficiently recognises and provides for all matters of national importance.

8.37. The proposed rezoning of the site has also been considered against the other matters listed in Section 7. The proposal does not impact on the role of kaitiakitanga and stewardship, and provides for efficient use of land that supports the current and future growth of Kaitaia. Any future development of the site is expected to enhance amenity values, quality of the environment and the intrinsic values of ecosystems, as demonstrated in the Masterplan provided in Annexure 2. The proposed rezoning does not preclude the use of renewable energy sources and provides for residential development outside of any known natural hazards, providing for adaptation and resilience to climate change.

8.38. The principles of the Treaty of Waitangi have been taken into account when considering the proposed rezoning and it is considered that many opportunities for partnership, engagement and participation are provided through this proposal.

8.39. 30 Year Infrastructure Strategy

8.40. As outlined in the Infrastructure Assessment Report (Annexure 3), Kaitaia has been identified as a key growth area for the Far North, with planned upgrades in the next three years, specifically for wastewater. The report notes that the infrastructure strategy highlights the importance of planning for long-term growth and delivering bulk infrastructure. The proposed rezoning of the subject site seeks to futureproof development and growth of Kaitaia and is supported by the outcomes sought through the 30 Year Infrastructure Strategy for the Far North.

8.41. Integrated Transport Strategy

8.42. There are no significant planned upgrades occurring in the Kaitaia roading network and, as outlined in the Transport Assessment Report (Annexure 2), the density anticipated by the proposed rezoning can be accommodated within the existing network therefore the proposal is consistent with the Integrated Transport Strategy.

8.43. Far North 2100

8.44. Far North 2100 is an 80-year strategy for the Far North that seeks community well-being, active response to climate change, connections between people, businesses and places, and protection of the natural environment for future generations. As assessed in sections above, the proposed rezoning aligns with the objectives of Far North 2100.

8.45. Long Term Plan 2024-2027

8.46. As outlined in the Infrastructure Assessment Report (Annexure 3), Kaitaia has been identified as a key growth area for the Far North, with planned upgrades in the next three years, specifically for wastewater. The proposed rezoning is consistent with the outcomes sought in the Long-Term Plan.

9. SITE SUITABILITY AND EFFECTS OF REZONING

9.1. Infrastructure Servicing

9.2. The Infrastructure Assessment Report has identified that there are suitable connection options for stormwater, wastewater and water in the road reserves adjoining the subject site, along both Donald Road and Allen Bell Drive.

9.3. FNDC have recently undertaken upgrades along Donald Road, with additional storage capacity provided. While there are known capacity issues in the wider Kaitaia area, the Infrastructure Assessment Report identifies that there are multiple options available to suitably service the site while connecting onto the existing wastewater network, including provision of additional upgrades to the network and capacity as part of any future development of the site. There are already planned upgrades to the network over 2024-2027 to provide greater capacity and overflow management works at the existing pump stations. As discussed in the Economic Assessment in Annexure 5, increased growth that would result from the proposed rezoning would support more efficient infrastructure delivery and optimise public investment in urban services. It would 'reduce the marginal infrastructure cost of that public investment with increased and more efficient use of those public assets.'

9.4. The subject site adjoins an existing treated water reservoir, with water connections both in the road network and within the site. The Infrastructure

Assessment Report has identified that there are no significant upgrades to the water network proposed in the current Long Term Infrastructure Strategy, however preliminary calculations provided in the Report indicate that there is sufficient capacity to support increased density of the subject site and anticipated if the zoning is changed to General Residential.

- 9.5. Overland flow path and minor stream channels drain stormwater from the site westward, through existing culverts, open drains and gullies. The Infrastructure Assessment Report identifies that the site is subject to minimal flooding risk, being only the lower-lying channels along the western boundary where the site discharges to the public network. As outlined in the Stormwater and Flood Management Assessment in Annexure 5, the development of the site will require onsite attenuation to avoid adverse flooding effects downstream, but the size of the site enables this to be done comprehensively with communal attenuation and treatment devices to ensure a high-quality environmental outcome.
- 9.6. The Infrastructure Assessment Report concludes that '[t]he site is strategically located adjacent to significant Council water supply and wastewater infrastructure, including proximity to FNDC's Kaitaia water reservoir and active construction works within the Donald Road wastewater catchment. FNDC's Infrastructure Strategy 2024 identifies Kaitaia as a growth area and explicitly prioritises bulk water and wastewater network upgrades in this location to accommodate anticipated residential growth.' In addition, the potential stormwater management strategy outlined in the Stormwater and Flood Management Assessment (Annexure 4) will ensure that stormwater treatment and management can be provided onsite to enable a high-quality, comprehensive development of the site that aligns with the future expectations of the Far North, regarding water quality and treatment. Overall, the proposed rezoning is appropriate from an infrastructure servicing perspective.
- 9.7. Transport Infrastructure
- 9.8. As identified in the Transport Assessment Report, the site is located within 1km of Kaitaia Township and 500m west of a commercial growth area, containing multiple large-scale retail and warehouse operators. There is also a large-scale industrial area 2km to the north of the site. The location of the site is optimal for all modes of transport to ensure that future residents are provided with choice.

- 9.9. The subject site has frontage onto two roads, with two suitable primary connection points that have sufficient visibility to satisfy Austroads access standards for new road connections. Given the topography and size of the site, it is most practical for a loop road through the site to service any future development, connecting Donald Road and Allen Bell Drive. This is more feasible with a higher density to support the costs of constructing a new public road that provides good connectivity throughout the site and the potential for extension of the public bus network. An indicative roading layout to demonstrate development of the site under the proposed General Residential Zoning is provided in the Masterplan appended as Annexure 6.
- 9.10. There is restricted public transport available in Kaitaia, however the site is reasonably well serviced with a bus stop located along Allen Bell Drive. In addition, given the proximity to both Kaitaia Township and the commercial centre to the west, the site is well located to enable both cycling and pedestrian access for future residents of a higher density development that would be allowable under the proposed rezoning. Improvements to pedestrian and cyclist access both within the site and the wider road network would be anticipated as part of any future resource consent application under the proposed rezoning.
- 9.11. The Transport Assessment Report investigated the current traffic volumes in the adjoining road network compared with the volumes anticipated if the site is to be rezoned to General Residential. The existing intersection with State Highway 1 (SH1) and Donald Road operates as a roundabout with sufficient capacity to accommodate an increase in traffic volumes without upgrades. The stop-controlled crossroad intersection between here SH1 and Allen Bell Drive can also accommodate the proposed traffic increase. The only constraints that require upgrades to the road network are the existing one-lane bridge along Donald Road (west of the subject site) and the intersection between Donald Road and Allen Bell Drive. The Traffic Assessment Report concludes that the one-lane bridge could operate with increased traffic anticipated from development under the currently proposed Rural Residential Zone (being less than 230 dwellings anticipated), however any development of more than 230 dwellings would require the bridge to be upgraded for two-way movement. It is expected that any application for resource consent for more than 230 dwellings in the future (under any zone) would condition the required upgrade to the bridge. The upgrade of the Donald Road and Allen Bell Drive would also remove confusion of right-of-way

which currently exists. This would have an overall benefit to the operation of the existing road network, including improving safety, and I would consider this a positive effect for the wider environment and FNDC have the ability to require these upgrades as part of any future resource consent application.

9.12. Natural Hazards

9.13. Much of the urban environment within Kaitaia is affected by the significant flooding which may increase in intensity as a result of climate change, as demonstrated in the Stormwater and Flood Management Assessment in Annexure 5. Flooding on the subject site is limited to lower open channel areas, primarily due to the high elevation. There are no other known hazards affecting the site that would preclude the land from being suitable for medium-density residential development.

9.14. Residential and Rural Land Supply

9.15. An Economic Assessment, provided in Annexure 5, concludes that the proposed rezoning is necessary, appropriate and economically efficient to ensure that the medium- and long-term growth requirements of Kaitaia are accommodated. The Assessment identifies that the Far North Housing and Business Development Capacity Assessment July 2024 (HBA) prepared to inform the PDP zoning framework concluded that the enabled capacity provided by the zoning framework is expected to be severely constrained and that there will be limitations on how many dwellings will actual be built to accommodate growth. In summary, the assessment indicates that the land required to accommodate projected growth in Kaitaia is not provided for in the PDP as notified and that the rezoning of the subject site, to enable higher density than what is currently proposed, will 'support the growth and spatial expansion of the Kaitaia Township, bridging the gap between theoretical and realisable capacity'.

9.16. The assessment further acknowledges that 'while it is possible that some of Kaitaia's theoretical capacity may become feasible over time due to changes in development costs, building technologies and household income dynamics, natural hazards pose additional limitations. Notably, river flood hazards are likely to inhibit the realisation of residential capacity in many greenfield areas surrounding Kaitaia.' The subject site is located outside of any significant natural hazards and provide an opportunity for diversification and growth where risks to

people and property are much lower than the currently zoned General Residential land.

- 9.17. Provision of additional land zoned General Residential will increase the short-medium term land supply and encourage 'diversification of house in housing location and price point'. The Economic Assessment further indicates that the proposed rezoning will have positive impacts in terms of efficiency of infrastructure use given proximity to the existing network and that increased supply of land will potentially lower house prices in Kaitia.
- 9.18. The Economic Assessment identified that the proposed rezoning would reduce potential for small-scale farming activities, however it is concluded that it would not be a 'material impact on the wider district's cumulative productive capacity and primary production sector'. The assessment also indicates that costs related to infrastructure provision are expected, and that where capacity is required this will need to be managed through developer contributions or by the developer providing the infrastructure upgrades themselves.
- 9.19. Reverse Sensitivity and Rural Productivity
- 9.20. The subject site is currently utilised for farming purposes and adjoins the proposed General Residential Zone along the northern and western boundaries, the proposed Rural Residential Zone along the southern and part of the eastern boundary, and the proposed Rural Production Zone along the remainder of the eastern boundary. There is also a water reservoir along the northern boundary.
- 9.21. The adjoining General Residential Zoned land is generally already developed to the scale of activities anticipated under that zone, with construction works underway on a multi-unit development on a large parcel of land to the north. The residential activities along the boundaries of the subject operate effectively while adjoining an active farm, with no known complaints around noise or activity. It is anticipated that should the site be rezoned, additional residential activities along the northern and western boundaries can reasonably be absorbed in the existing environment, given that it is already residential in nature.
- 9.22. Along the southern boundary of the site, there is a large stand of trees which is likely to be retained due to topographical constraints in this area, as indicated in the Masterplan provided in Annexure 2. Therefore, it is unlikely any potential

reserve sensitivity effects will result from future residential development of the subject site.

9.23. Along the eastern boundary, the topography creates a natural barrier between the subject site and adjoining farmland. It is expected that any future dwellings along this boundary will be lower than the ridgeline that roughly follows the boundary between the two properties and that much of the noise and odour resulting from farming activities will be contained within the adjacent site. In addition, mitigation measures can be imposed as part of any future resource consent application to ensure that buffer planting and setbacks are applied along the eastern boundary, if required. The zoning pattern within Kaitaia has many instances of the General Residential Zone adjoining the Rural Production Zone, therefore the proposed zoning is not inconsistent with the approach of the wider environment of Kaitaia.

9.24. Regarding rural productivity, the site contains only a small portion of LUC Class 2 and 3 soils in the western corner of the site. The property is currently zoned Rural Lifestyle under the Operative Plan and is intended for semi-residential use rather than large-scale rural productive use. Given that most of the site does not contain highly productive soils and that the current zoning allows for residential development to occur, there are no adverse effects on rural productivity anticipated.

9.25. Comprehensive Development Approach

9.26. As outlined through earlier sections, the subject site provides a unique opportunity for the futureproofing and growth of Kaitaia by enabling a comprehensive residential development to occur in proximity of the two commercial hubs. The site has good vehicle, pedestrian, cycling and public transportation links to the wider township. There are opportunities to connect into all reticulated infrastructure networks and provide upgrades as required. The size of the site will enable a large residential development to occur while managing stormwater and treatment onsite and providing for enhancement of natural features that also manages steeper elements of the topography.

9.27. As demonstrated in the Masterplan provided in Annexure 6, the site is 15 minutes walking distance from the commercial hub to the west of the site and less than 20 minutes from the Kaitaia Township. There are existing footpath connections

to both commercial centres, along with access to regular public transport buses, as outlined in the Traffic Assessment Report (Annexure 2). The potential for a loop road through the site provides an opportunity to expand the public bus network to service a wider portion of the community as well.

9.28. The Masterplan provides a realistic potential site layout for development of the site at a higher density than that provided for by the current proposed Rural Residential Zone. It was developed considering the natural feature of the site, the required stormwater management and treatment features that would be required to service future development and provides for the gentler topography along the northern and eastern boundaries to be utilised for residential purposes. Considering all of these elements, approximately 50 percent of the site can be utilised for residential development, therefore enabling higher density on this piece of land provides a financially viable option that futureproofs growth in Kaitaia without compromising the safety of people and property within areas subject to natural hazards.

9.29. Assessment of Effects Conclusion

9.30. Overall, the effects anticipated by the proposed rezoning will be acceptable and can be avoided, remedied and mitigated through future resource consenting processes.

10. SECTION 32AA ASSESSMENT

10.1. Section 32AA requires a further evaluation for any changes that have been made to the proposal since the evaluation report was completed. The tables below provide a summary of the different options, costs and benefits considered, as required under s32 of the RMA. It explains why the preferred option has been chosen and also discusses the alternative which has also been considered.

Table 1: Rezoning Proposal

The specific provisions sought to be amended	Assessment of the efficiency and effectiveness of the provisions in achieving the objectives of the Proposed Far North District Plan (PDP)
The rezoning proposal	<p>KLL has made a submission to PDP requesting their site at Donald Road and Allen Bell Drive as legally described below are amended on Planning Maps from Rural Residential Zone to General Residential Zone.</p> <ul style="list-style-type: none"> • Part Lot 1 DP 173052 (62.411 ha)
Relevant Objectives of the PDP	<p>The relevant PDP objectives and policies relevant to the proposal have been assessed in Section 7 of the evidence above.</p>
Scale and Significance of the rezoning proposal	<p>The rezoning proposal will result in a reasonable change to the zoning management framework contained in the PDP, however the perceived change is more significant than the actual anticipated change, given the findings of the Economic Assessment Report in Annexure 5, which have identified that the original land supply assessment had not taken any potential physical constraints into account and a noteworthy portion of Kaitaia Township is constrained by significant flooding risk.</p> <p>The rezoning proposal involves a relatively modest area of approximately 62 ha adjacent within Kaitaia. Approximately 500 residential lots are expected to be enabled by the rezoning.</p> <p>The rezoning proposal is considered to be of local significance, focused largely on Kaitaia and to a lesser extent all other Far North District communities.</p>

Other reasonably practicable options to achieve the objectives (alternative options)	<p>Option 1: Rezone the subject site to General Residential Zone</p> <p>Option 2: Do nothing / status quo (retain the Rural Residential Zone currently proposed in the PDP)</p>
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Table 2: Benefits and Costs Analysis of the Rezoning Proposal

Rezoning Proposal: Rural Residential to General Residential		
	Benefits	Costs
General	Option 1 would allow the KLL site to be developed for higher density residential activities. This meets the objective of the landholder.	Option 2 would not provide higher density residential activities and therefore does not meet the objective of KLL. Option 2 also risks the fragmentation of well positioned and serviceable land that may hinder the long-term growth potential for Kaitaia.
Environmental	Option 1 provides greater incentive for a comprehensive development of the site, which will enable preservation and enhancement of the degraded streams through the site. It also encourages higher density within a site that does not contain any outstanding or significant features that could be affected by residential development. This	Option 1 would result in 62ha of land being removed from primary production and will reduce the available land for small-scale farming activities and rural lifestyle lots. There is an increased risk of reserve sensitivity effects resulting from higher intensity residential activities occurring along the Rural Production Zone boundary.

	<p>option also encourages residential development in an area unaffected by natural hazards.</p> <p>Option 2 would retain the existing rural character and amenity of the location. The proposed Rural Residential Zone provides a buffer between primary production activities and the urban residential environment.</p>	<p>Option 2 would retain the status quo in terms of continued use of the land for primary production activities. There is less incentive to develop the site in a comprehensive manner that could result in significant enhancement of degraded water courses and their margins.</p>
Social	<p>Option 1 would enhance public access to the watercourses within the site, with greater incentive to establish cycleways, footpaths and reserve spaces (also required to manage stormwater runoff from a large-scale development).</p> <p>Option 1 will strengthen the sense of place by creating a high-quality community focused on the enhancement of natural features within the site. This could enhance cohesion, stability, character, services and facilities in the community. This includes using existing social infrastructure in Kaitaia, supporting the existing community.</p> <p>Option 1 would assist with providing a variety of housing options in Kaitaia and provides certainty for future residents that their lives and homes are safe from natural</p>	<p>Option 2 will not enhance public access to the natural features on the site.</p> <p>Option 1 would result in a degree of change to the community, which may be perceived as significant.</p> <p>Option 2 will not bring any additional housing options to the Kaitaia and will not offer residents more certainty around risk from natural disasters on their lives and homes.</p> <p>Option 2 does not promote climate resilience and adaptation to ensure the long-term security of the Kaitaia community, i.e. Kaitaia being a safe place for people to live and raise families.</p>

	<p>hazards, as climate change is resulting in more frequent and intense events.</p> <p>Option 2 would result in no change to the community.</p>	
Economic incl. Economic Growth	<p>Option 1 would grow the residential component of Kaitaia with residents able to support local business both within Kaitaia Township and the northern commercial centre, given ease of access and options.</p> <p>Option 1 would enable economic growth as a consequence of developing the subdivision and the construction of houses and potentially lower land prices and increase local employment.</p> <p>Option 1 promotes residential development on land not subject to natural hazards, which reduces the risk of insurance being declined for future residents when natural disasters occur, i.e. flooding.</p> <p>Option 1 will increase the short-medium term residential land / dwelling supply to accommodate anticipated growth in Kaitaia and signal to the market that there is ability to meet future demand pressures.</p> <p>Option 1 will also increase efficiency of infrastructure provision.</p>	<p>Option 1 would remove 62 ha of land from primary production and reduce the availability of land for small-scale farming activities and rural lifestyle blocks where there may be a demand, increasing costs for rural residential land elsewhere.</p> <p>Option 1 will increase costs for additional infrastructure and investment, with additional costs expected on the developer of the land to support growth.</p> <p>Option 1 has the potential to redirect demand away from existing land zoned General Residential, which could result in duplication or underutilization of infrastructure.</p> <p>Option 2 has the potential to limit future economic growth in Kaitaia by supporting a zoning framework that will have a shortfall in supply for residential growth in the future and could discourage people from remaining or moving to the area.</p>

	Option 2 would result in no change to benefits on the economy.	
Employment	Option 1 would enable employment as a consequence of developing the subdivision and the construction of houses. It will also increase residential land in proximity to the commercial centres which will support business and employment, with an increased local population base. Option 2 would have no impact on employment.	Option 1 may result in a reduction of employment associated with primary production.
Cultural	Option 1 would enhance access to natural features within the site for iwi to undertake customary activities through creation of green corridors.	Option 2 does not enhance access to natural features on the site for iwi to undertake customary activities.

Table 3: Evaluation of the proposal

Reasons for the selection of the preferred option	The preferred option is Option 1 (General Residential Zone). This option aligns best with the objectives and policies of the PDP and results in an overall benefit to the wider community allowing people to provide for their well-being will ensuring the finite natural and physical resources are provided for the reasonably foreseeable future. Option 1 provides for future growth of Kaitaia without compromising logical subdivision patterns while enabling affordability and climate change adaptation and resilience.
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<p>Extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the RMA</p>	<p>In this context of this s32AA assessment, “objectives” relate to the relief sought in the submission to rezone the subject site to General Residential.</p> <p>The original s32 documents prepared for the PDP considered the objectives of the plan and whether they were the most appropriate way to achieve sustainable management in the Far North District. The following considers whether the proposed changes requested in the KLL submission are now the most appropriate way, and continue to achieve sustainable management as set out in Section 5 of the RMA.</p> <p>The proposed rezoning seeks to adopt the General Residential Zone provision of the PDP. It is therefore considered appropriate to largely adopt the analysis undertaken in the preparation of the PDP. On the basis of the cost benefit analysis above, Option 1 is considered to be the most appropriate way of achieving the objectives of the plan (as discussed in Section 7 of this evidence) and the proposal. The zoning represents the most effective and efficient approach to enable residential development of the site and ensuring sustainable use of the resource.</p>
<p>Assessment of the risk of acting or not acting if there is uncertain information about the subject matter of the provisions.</p>	<p>The information available is sufficient to provide an informed assessment of the planning alternatives and costs and benefits.</p>
<p>Conclusion</p>	<p>Option 1 is the most appropriate way to achieve the objectives of the PDP and Section 5 of the RMA, for the reasons outlined in the tables above.</p>

11. CONSULTATION

- 11.1. Consultation on this proposed submission has been limited to discussions with Far North District Council staff, including policy planning, infrastructure engineering and transport planning.
- 11.2. An invitation to provide feedback on the proposed rezoning was also sent to Te Rūnanga o Te Rarawa, however no response has been received to date. If feedback is provided, this will be made available to FNDC.
- 11.3. No further submissions were made on the proposed rezoning submission and therefore no discussion with other submitters has been undertaken.

12. RELIEF SOUGHT

- 12.1. Amend the proposed zone for the subject site from Rural Residential to the General Residential Zone.
- 12.2. Retain the minimum allotment sizes for the Rural Residential and General Residential Zones.

13. CONCLUSION

- 13.1. This evidence has been prepared in relation to KLL's submission to the PDP relating to the rezoning of the subject site to General Residential.
- 13.2. The site is well suited to be zoned General Residential, and a Masterplan has been prepared to inform future development (Annexure 6). The rezoned area is likely to accommodate around 500 dwellings, in addition to roads, reserves, cycleways and footpaths.
- 13.3. The proposal aligns with the objectives and policies of the PDP and results in an overall benefit to the wider community allowing people to provide for their well-being while ensuring the finite natural and physical resources are provided for the reasonably foreseeable future. The requested rezoning provides for future growth of the Kaitaia without compromising logical subdivision patterns while enabling affordability and climate change adaptation and resilience.

- 13.4. The rezoning of the subject site aligns with higher order documents including the RMA, the RPS, NPS's, NES's and other relevant local strategic documents and is considered a superior outcome for the site and the wider environment.

Sarah Jean Robson

6th June 2025