Proposed Far North District Plan

Ms Audrey Cambpell-Frear

Presentation to Independent Hearings Panel, evidence presented by Melissa McGrath

27th May 2024

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Introduction

Key points in my planning evidence on behalf of Ms Audrey Cambpell-Frear

- The important role of the Strategic Direction Chapter.
- Lack of policies in the Strategic Direction Chapter.
- Centres hierarchy.
- Zone framework.
- Strategic Direction and NPS-HPL.

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The important role of the Strategic Direction Chapter

- SD is the “engine room” of the PDP – it is important to get this right.
- As proposed SD is flawed – it fails meet mandatory direction of the National Planning Standard to adequately address significant resource management matters:
  - Balance and trade-offs between conflicting matters of national, regional and local importance.
  - Strategic direction for urban development and centres hierarchy.
  - Strategic direction or policy support for the suite of rural zones proposed.
  - Zone framework including purpose, direction and zoning criteria for zones.

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Lack of policies in the Strategic Direction Chapter

- As proposed SD does not include policies.
- National Planning Standards mandatory direction 7.1.c states if policies are to be included, they must be located in the Strategic Direction section, "***unless*** *those policies are better located in other more specific chapters*".
- There is a lack of integration between the objectives with policies from other chapters suggesting that S32(1)(b) has not been met.
- Strategic direction with respect to management of effects within rural and urban environments, zoning and centres hierarchy is **not** better located within zone chapters as they apply across zone boundaries and across the district.

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Centres hierarchy

- Establishing a hierarchy to centres assists to confirm the range of resource management issues, potential effects and responses to these, tailored to different types of urban centres creating an efficient and effective zoning method.
- In my opinion a single Mixed Use Zone is unusual, ineffective and inefficient.
- S32 evaluation is incomplete and provides insufficient justification for the single zone approach.
- Demand is not the sole justification nor determination of zoning framework.
- Hierarchy can be established using factors.

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Zone framework

- Strategic Direction objectives are silent with respect to zoning criteria and outcomes across zones.
- Zoning framework provides direction for consideration of resource consents and private plan changes seeking to rezone land.
- S32 evaluation does not provide justificiation for zones including critiera for selection and spatial distribution.
- S32 does not evaluate options utilising the full range of National Planning Standards.

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Strategic Direction and NPS-HPL

- The PDP and S42A recommendations fail to give effect to the NPS-HPL.
- Objectives and provisions in the PDP which contradict the NPS-HPL does not align with S32.
- In my opinion SE-RE-O2 is inconsistent with the NPS-HPL because it does not specify the purpose of protection for use in land-based primary production.
- Ms Campbell-Frear has opposed the Horticulture Zone in the PDP, I recommend that this zone is deleted. It fails to give effect to the NPS-HPL.
- The PDP definition of HPL is contrary to the NPS-HPL definition.

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