

# Proposed Far North District Plan

Ms Audrey Campbell-Frear

*Presentation to Independent Hearings Panel,*

*Evidence presented by Melissa McGrath*

*Hearing 9 Rural, Horticulture and Horticulture Processing*

5 December 2024

# Summary of Evidence

- ❖ Relief sought;
- ❖ Appropriateness of the Horticulture Zone (HZ);
- ❖ Kerikeri/Waipapa Horticultural Area; and
- ❖ National Policy Statement for Highly Productive Land (NPS-HPL)

# Relief Sought

- ❖ Delete the proposed HZ because:
  - HZ does not achieve the purpose of the RMA insofar as it does not promote the sustainable management of natural and physical resources
  - HZ fails to give effect to the National Planning Standards and the NPS-HPL
  - HZ section 32 evaluation is incomplete and flawed
  - PDP does not provide strategic direction or policy support
  - HZ has only been proposed within the Kerikeri/Waipapa area; and
  - The HZ provisions are not sufficiently different from the Rural Production Zone (“RPROZ”) (and in some instances are more permissive)

## Section 32

- ❖ Examine the extent to which the **objectives** of the proposal are the most appropriate way to achieve the purpose of the Act
- ❖ Examine whether the **provisions in the proposal** are the most appropriate way to achieve the objectives
- ❖ Zoning is a tool, a method, and by definition a **provision**, which must be evaluated as the most appropriate way to achieve the objectives.

## Appropriateness of HZ - Objectives & Purpose of RMA

- ❖ HZ objectives are not the most appropriate way to achieve the purpose of the RMA:
  - Fail to enable people and communities to provide for their social, economic and cultural wellbeing as required to achieve section 5 the purpose of the Act;
  - Restrictive, limiting the use of natural and physical resources for a purpose other than for horticultural activities;
  - Do not achieve section 7(b);
  - Do not recognise HPL as a finite resource and are not in accordance with section 7(g).

### Mandatory Direction 8.3:

An additional special purpose zone **must only** be created when the proposed land use activities or anticipated outcomes of the additional zone **meet all** of the following criteria:

- a. are **significant** to the district, region or country
- b. are **impractical** to be managed through another zone
- c. are **impractical** to be managed through a combination of spatial layers.

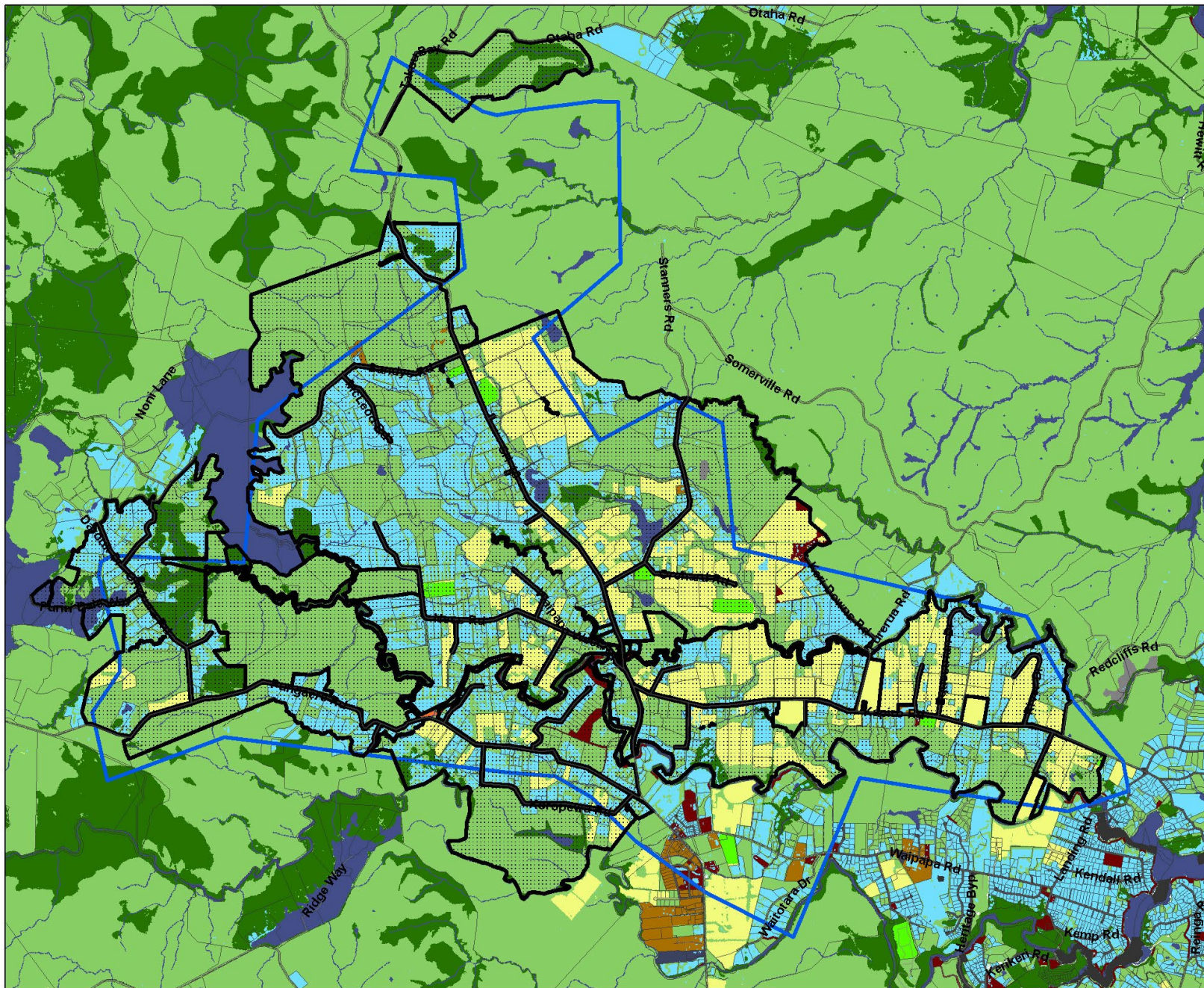
## Appropriateness of Provisions to Achieve Objectives – Special Purpose Zone
















- ❖ The proposed **land use activities or anticipated outcomes** of an additional special purpose zone must meet all criteria.
- ❖ HZ is not **significant to the district, region or country**
  - Value of the Kerikeri Irrigation Scheme to be significant to the district, region or country and alone does not warrant a separate zone.
  - HZ policy applies selectively to the Kerikeri/Waipapa area and has not been mapped throughout the district.
  - The proposed land use activities are enabled and appropriately managed via the proposed RPROZ.
- ❖ It is not **impractical to manage** via either the RPROZ or the General Rural Zone.
- ❖ It is not **impractical to manage** via other spatial layers such as a district wide overlay of HPL

## Appropriateness of Provisions to Achieve Objectives

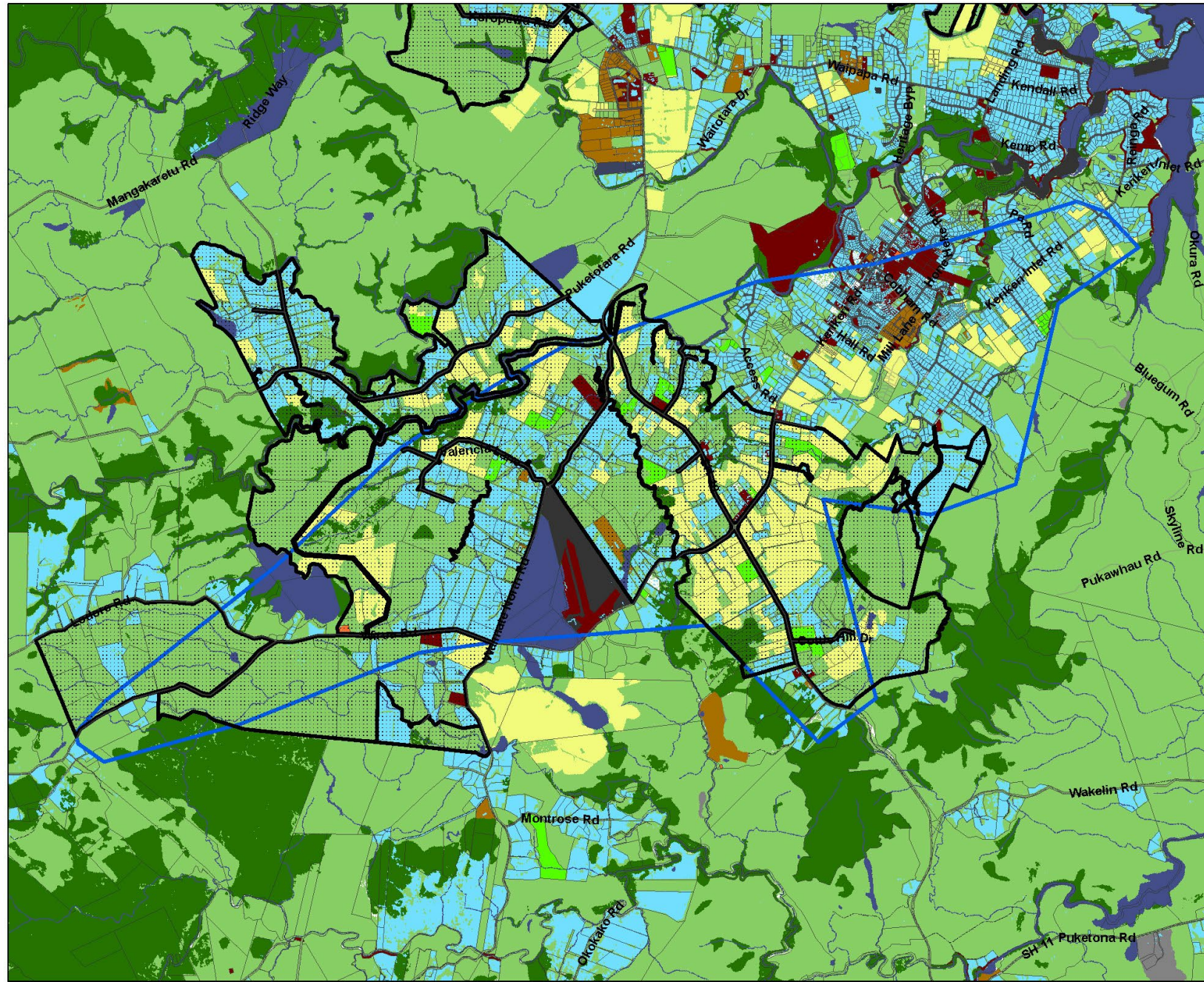
- ❖ RPROZ and HZ provisions are largely duplicated
- ❖ HZ-P3 seeks to enable Horticulture and Ancillary Activities only, but HZ and RPROZ as proposed are equally enabling of non-horticultural rural production activities
- ❖ HZ provisions seek “to hold the line” at current levels of non-rural development. 87.3% of HZ are used for other purposes
- ❖ HZ subdivision provisions seek to avoid fragmentation. 93% of parcels within the HZ are smaller than the proposed minimum lot size of 8ha as a discretionary activity
- ❖ HZ zone criteria are not the most efficient and effective




















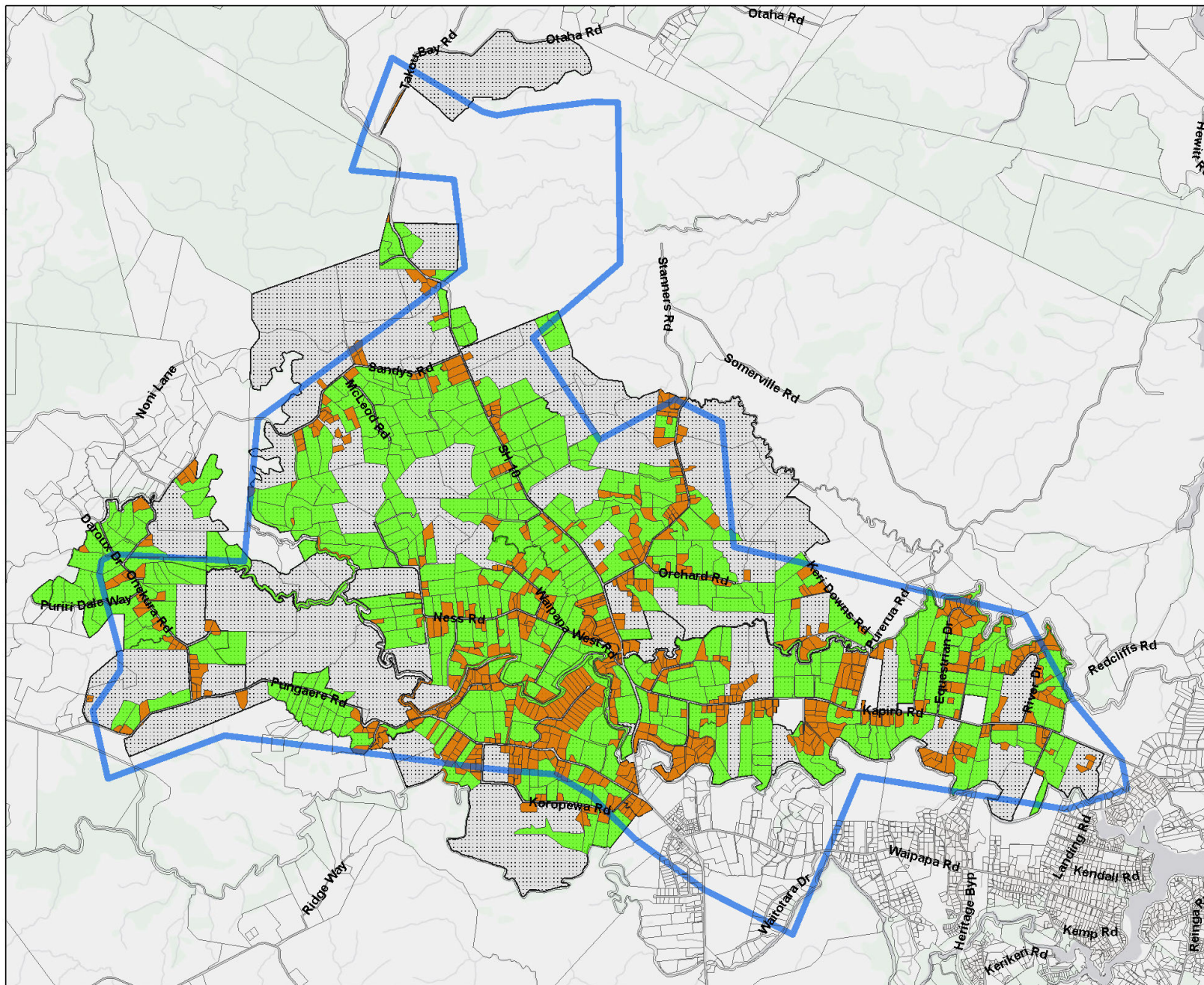
- Legend**
-  Proposed Horticulture Zone
  -  Kerikeri Irrigation Scheme
  -  Conservation and Natural Environments
  -  Dryland Agriculture and Plantations
  -  Irrigated Agriculture and Plantations
  -  Intensive horticulture
  -  Intensive animal production
  -  Manufacturing and industrial
  -  Residential and farm infrastructure
  -  Services
  -  Utilities
  -  Transport and communication
  -  Mining
  -  Waste treatment and disposal
  -  Water





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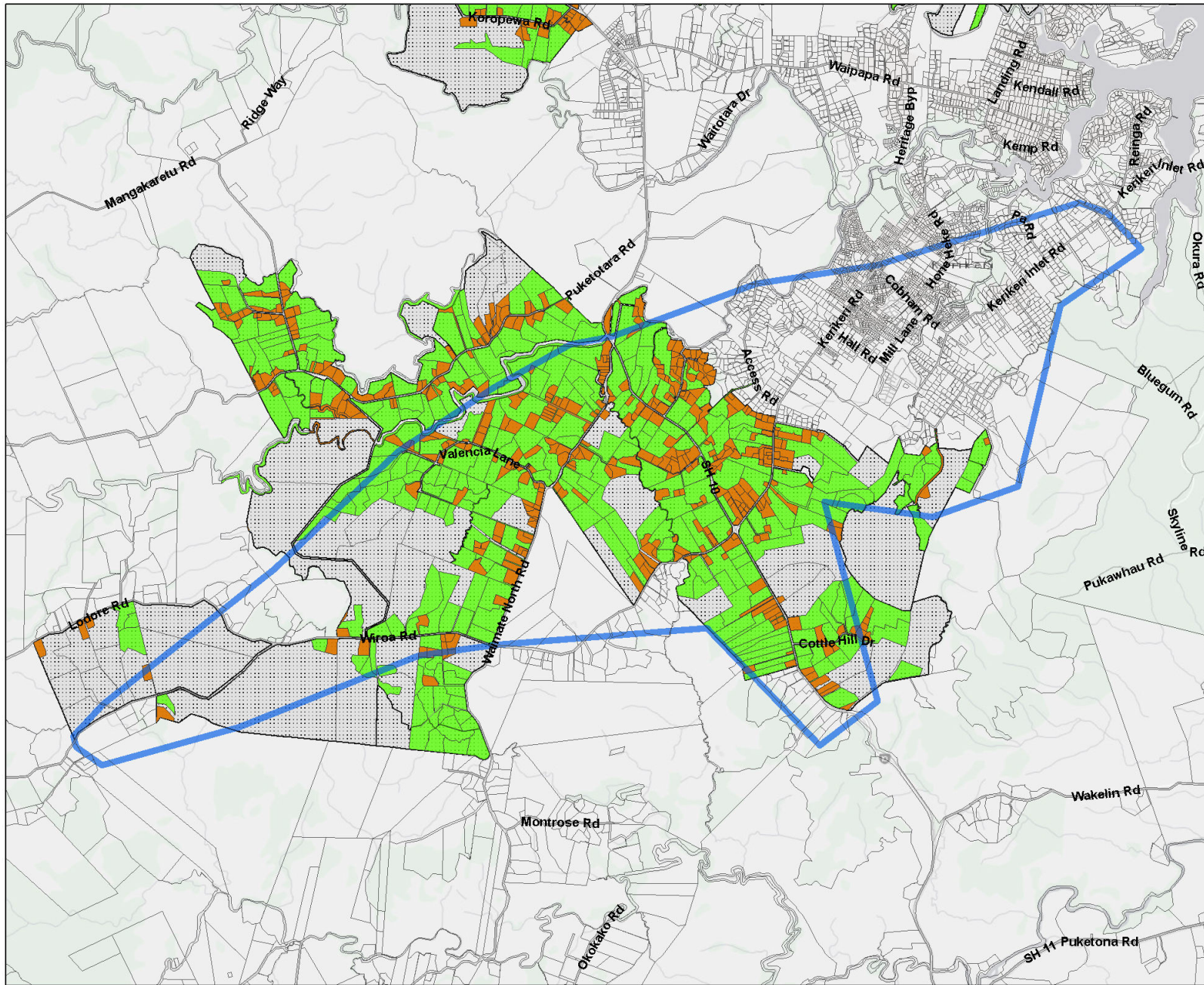
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



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- Legend**
-  Proposed Horticulture Zone
  -  Kerikeri Irrigation Scheme
  -  Land parcel within Proposed Horticulture Zone ineligible to connect for commercial reticulation (<2ha) (732)
  -  Land parcel within Proposed Horticulture Zone below a suitable size for productive horticulture activities (<10ha) (1,143)

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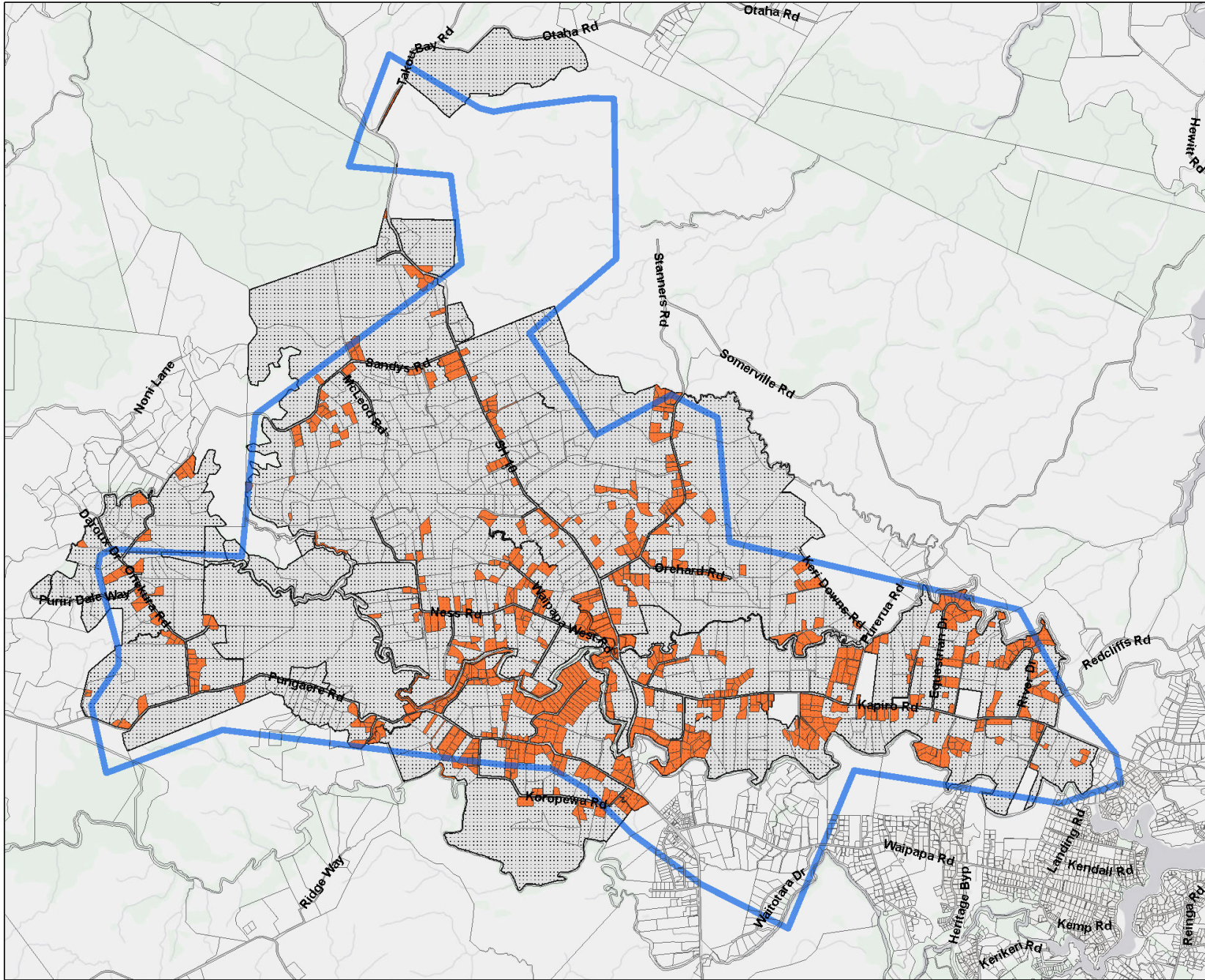


- Legend**
-  Proposed Horticulture Zone
  -  Kerikeri Irrigation Scheme
  -  Land parcel within Proposed Horticulture Zone ineligible to connect for commercial reticulation (<2ha) (496)
  -  Land parcel within Proposed Horticulture Zone below a suitable size for productive horticulture activities (<10ha) (811)




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## Kerikeri/Waipapa Horticultural Area

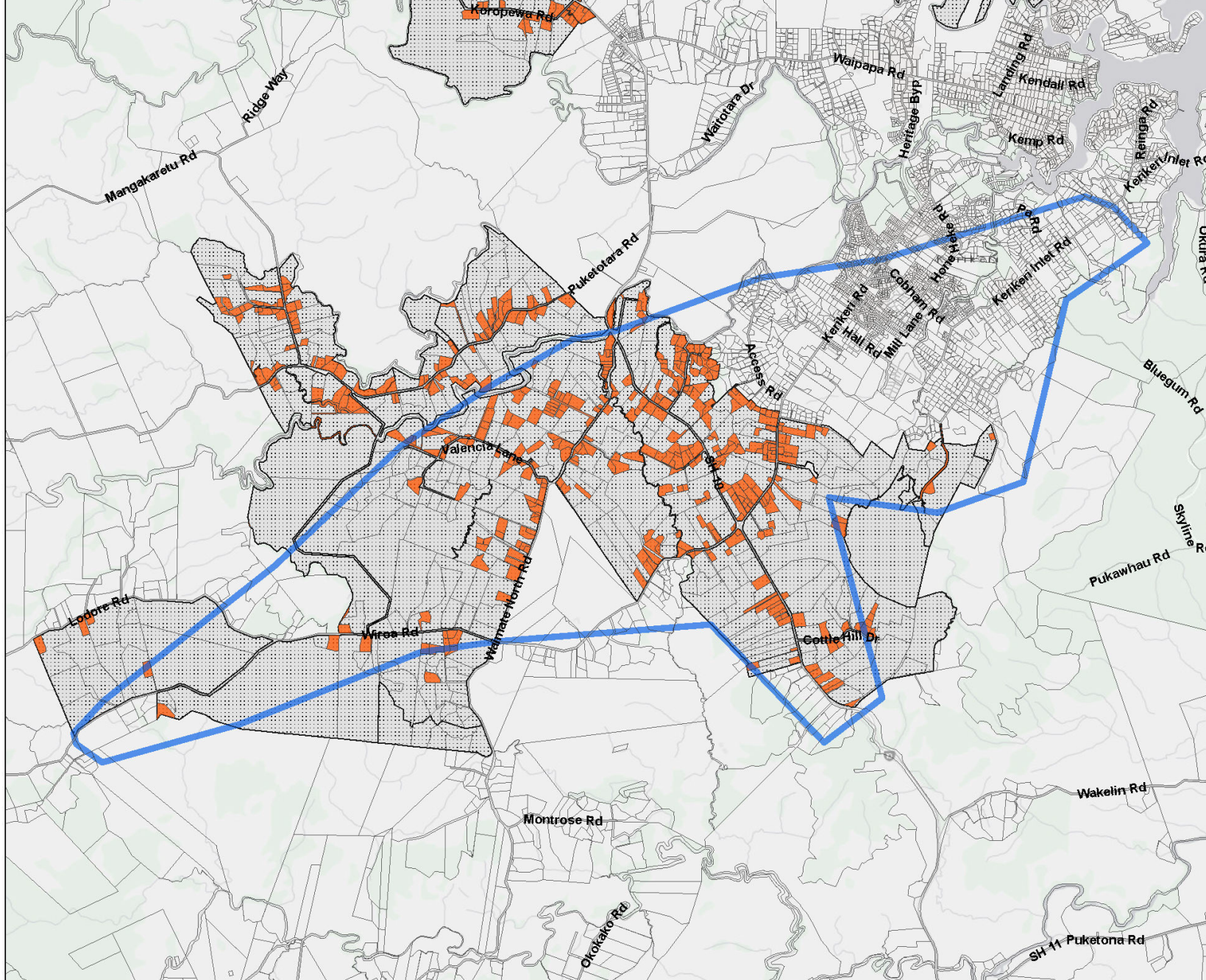
- ❖ Kerikeri/Waipapa Irrigation Scheme is not RSI
- ❖ Access to KIS is controlled by private ownership and limited to a 2ha minimum but 59% of properties within HZ are below 2ha
- ❖ Processing and storage facilities are not unique to the area and not uncommon in RPROZ
- ❖ HZ does not manage the potential reverse sensitivity effects anymore than the RPROZ
- ❖ HZ land is already fragmented
- ❖ KIS is not generating a greater level of economic output than in areas not covered by the scheme
- ❖ Productive potential of LUC 4 does not warrant protection even if irrigated



**Legend**

-  Proposed Horticulture Zone
-  Kerikeri Irrigation Scheme
-  Land parcel within Proposed Horticulture Zone ineligible to connect for commercial reticulation (<2ha) (732)

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# NPS-HPL

- ❖ Onus and requirement to map HPL is on regional council
- ❖ Elevation and protection of LUC 4 does not give effect to NPS-HPL
- ❖ I support alignment of HPL definitions
- ❖ Do not support further restriction of proposed HZ-RY and HZ-RZ requiring discretionary activity consent for existing commercial and industrial activities
- ❖ Do not support recommended change to minimum lot size SUB-S1