BEFORE THE INDEPENDENT HEARINGS PANEL

UNDER the Resource Management Act 1991 (RMA)

IN THE MATTER of the Far North Proposed District Plan – Hearing 14:

Urban Zones

STATEMENT OF EVIDENCE OF JANE RENNIE ON BEHALF OF FAR NORTH DISTRICT COUNCIL

URBAN DESIGN

20 JUNE 2025

Instructing solicitor:

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1. EXECUTIVE SUMMARY

- 1.1 My name is Jane Rennie and I am an Urban Designer and Partner at Boffa Miskell Limited. I have been engaged by Far North District Council ('Council') in relation to Kāinga Ora's submission ('KO') on the Far North District Proposed District Plan ('PDP') for a Town Centre ('TC') zone for Kerikeri town centre.
- 1.2 KO have requested the introduction of a TC zone for Kerikeri in recognition of its importance as a growing centre in the Far North. It would apply to the extent of the existing Mixed Use ('MU') zone. The zone provisions requested would enable buildings up to 6 storeys (22m in height) and provide for ground floor residential activity, except where a pedestrian frontage is identified.
- 1.3 From an urban design perspective, a TC zone as composed is well conceived and sound in its execution. The Kerikeri town centre is acknowledged as the primary centre within the District and is anticipated to continue to grow. A TC zone would provide a sound foundation for future land use design and consenting.
- 1.4 The strategy of enabling greater height up to 22 metres as a permitted activity is however considered to have adverse urban design effects and is not considered appropriate. In order to achieve a more consistent built form outcome and a logical urban form for the town, a revised height limit of 15 or 16 metres is considered most appropriate in the context. This would comprise a good baseline and better support an intensity of commercial activity distributed across the town centre as a whole.
- 1.5 In conclusion, I consider that the TC zone, with the associated controls are suitably robust and comprehensive and will contribute to achieving a mix of town centre activities and a high quality amenity anticipated for a centre of this nature, noting the recommended change to the maximum height limit.

2. INTRODUCTION

- 2.1 My full name is Jane Maree Rennie. I am an Urban Designer and Partner with Boffa Miskell Limited, based in the firm's Christchurch office. I have been employed by Boffa Miskell since 2009. I hold the qualifications of Bachelor of Planning from Auckland University (1994) and a Post Graduate Diploma (Merit) in Urban Design from the University of Westminster (London) (2005).
- I am a Full Member of the New Zealand Planning Institute. I am a member of the Urban Design Forum, a Crime Prevention Through Environmental Design ("CPTED") Practitioner¹ and a member of the Lyttelton Design Review Panel. The role of the Panel is to provide design advice to promote good design and a quality urban environment that expresses the local character and identity of Lyttelton. I am an Approved Urban Design Expert Certifier on behalf of Christchurch City Council.
- I have 30 years' experience working in Urban Design and Planning in New Zealand, North America, and the UK for both the public and private sectors. My professional areas of expertise include concept and master planning, spatial planning, precinct plans, urban amenity and character studies, urban design assessments, policy development and guidance, land use and public transport integration, public and stakeholder engagement and CPTED. In my work at Boffa Miskell I have been involved in the urban design for a number of town centres. I contribute to urban design content of District Plans. I have prepared evidence for and appeared in resource management consent and plan hearings, Environment Court mediations and Environment Court hearings.
- I have been assisting the Council on the Te Pātukurea Kerikeri Waipapa Spatial Plan ('KWSP') during 2024 and 2025. As part of this process I have provided urban design input into the future urban form of Kerikeri including the extent of the town centre. I am familiar with the Kerikeri context and visited the town several times.

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¹ International Security Management and Crime Prevention Institute Advanced Workshop Training, 2017 / Advanced CPTED Training Course, Frank Stoks, 2010.

- 2.5 This urban design evidence has been prepared on behalf of Far North District Council ('Council'). It relates to Kāinga Ora's submission ('KO') on the Far North District Proposed District Plan ('PDP') in relation to the introduction of a Town Centre ('TC') zone for Kerikeri town centre.
- 2.6 The following information has been reviewed in preparing this evidence:
 - Kāinga ora Submission No.561, including Appendix 1 Table outlining the bulk of the submission, Appendix 3 Planning Map (Kerikeri) and Appendix 5 Proposed TC zone provisions.
 - (b) Mixed Use ('MU') zone chapter of the Proposed District Plan, as notified.
 - (c) Section 32 report in relation to the MU zone.
 - (d) Te Pātukurea Spatial Plan.

Code of Conduct

- 2.7 Although this is a Council hearing, I have read the Environment Court's Code of Conduct and agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this statement of evidence are within my area of expertise.
- 2.8 Except where I state that I am relying on the evidence of another person, my written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Scope of Evidence and Approach

The scope of this evidence relates to a request by Kāinga Ora for a new TC zone for Kerikeri in recognition of its importance as a growing centre in the Far North (Submission No.561). Specifically, this evidence relates to the urban design issues associated with the proposed change of zoning, including:

- (a) Rationale for a TC zone and implications for its role and function as a centre.
- (b) The spatial extent of the TC zone.
- (c) Built form outcomes, particularly building height.
- 2.10 To consider the impacts of the proposed TC zone, it is necessary to assess the level and significance of effects resulting from the proposed TC zone. This is considered in terms of whether there will be a positive (beneficial) or negative (adverse) urban design effect in the context of the Kerikeri town centre, including if any changes are considered relevant in relation to the proposed TC zone.
- 2.11 For the purposes of responding to the scope of evidence, the following approach has been adopted in determining the effects of the proposal:
 - (a) Background to the purpose and built form outcomes sought through the proposed Mixed Use zone.
 - (b) Rationale of the KO submission, including the spatial extent of the TC Zone.
 - (c) Overview of the Te Pātukurea Spatial Plan, including the outcomes sought for the Kerikeri town centre.
 - (d) Overview of the existing characteristics of Kerikeri town centre.
 - (e) Urban design assessment of the TC zone proposal with a focus on the rationale for the zone, implications for the role, functional and spatial extent of the centre and built form outcomes.
 - (f) Conclude on which zone is considered to be most appropriate for the outcomes sought from an urban design perspective.

3. RELEVANT BACKGROUND

Statutory Considerations

- 3.1 In terms to statutory considerations, of particular relevance is the National Policy Statement on Urban Development ("NPS-UD"). The recent adoption of the Te Pātukurea Spatial Plan will result in a population exceeding 10,000 and the area will equate to an 'urban environment', with Tier 3 requirements relevant.
- 3.2 It is relevant to reflect on the new statutory context created by the NPS-UD and the directive requirements under the Resource Management Act 1991 ("RMA") as amended by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 ("EHSAA"). This includes the new policy focus of the NPS-UD as it relates to design and built form on the quality and functionality of the future built environment. This includes the amenity benefits of enabling people to live in areas of higher accessibility.
- 3.3 Of particular relevance from an urban design perspective are the following:
 - **Objective 1:** New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic and cultural wellbeing, and for their health and safety, now and into the future.
 - **Objective 3:** Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:
 - (a) The area is in or near a centre zone or other area with many employment opportunities;
 - (b) The area is well-serviced by existing or planned public transport; and.

(c) There is high demand for housing or for business land in the area, relative to other areas within the urban environment.

Objective 8: New Zealand's urban environments:

(a) Support reductions in greenhouse gas emissions.

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

- (a) Have or enable a variety of homes that:
 - (i) Meet the needs, in terms of type, price, and location, of different households ...
- (b) Have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
- (e) Supports reductions in greenhouse gas emissions.

Policy 5: Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of:

- (a) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or
- (b) relative demand for housing and business use in that location.

Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

(a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement.

- (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:
 - (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and
 - (i) are not, of themselves, an adverse effect
- (c) the benefits of urban development that are consistent with wellfunctioning urban environments (as described in Policy 1)
- (d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity
- (e) the likely current and future effects of climate change.

Te Pātukurea Spatial Plan (2025)

- 3.4 Te Pātukurea comprises the Spatial Plan for Kerikieri-Waipapa. This has been adopted by Council and is a non-statutory document that sets out how Council will manage growth over a 30 year period by identifying areas appropriate for housing, business and industry.
- 3.5 The KWSP acknowledges the role of Kerikeri within the District as a key centre, including in relation to professional services, real estate, retail, healthcare amongst other activities. Given sustained business growth there is increasing pressure on commercial land supply and for Kerikeri this translates to 13.9 hectares of additional land for commercial activity. This has been identified immediately adjacent to the existing town centre, as outlined in the extract of the Spatial Plan map for Kerikieri by the 'hatched' commercial mixed use area (see **Figure 1**).
 - 3.6 Overall, the Spatial Plan seeks to:

- (a) Enhance Kerikeri's role as a key retail, cultural, business, and tourism centre and strengthening the town's unique character and services to attract more visitors.
- (b) Enable commercial and industrial growth which supports its role as the key economic hub for the district including growth and intensification of commercial development including promoting a more functional layout for large-format retail within the two townships. It also acknowledges the need for future projects to further define the role and character of Kerikeri in supporting a vibrant and engaging urban environment.
- (c) Establishes walkable catchments to the core retail area to support a compact and sustainable urban form.

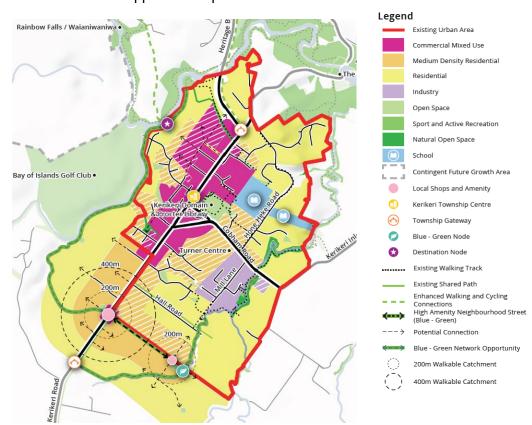


Figure 1: Extract of the Spatial Plan for Kerikeri

Background to the Mixed Use Zone

3.7 The 'Overview' of the MU zone in the PDP is useful in identifying the key issues the zone provisions are targeting and the outcomes that can be anticipated. From an urban design perspective the zone:

- (a) Is a focus for the District's commercial, community and civic activities and provides for residential development where it is complimentary to these activities.
- (b) Contributes to the prosperity of the district's urban centres.
- (c) Anticipates development of a form, scale, density and design quality that contributes positively to the vibrancy, safety and amenity.
- (d) Requires development to contribute positively to streetscapes, amenity and pedestrian connectivity.
- 3.8 The Council's s32 report for the MU zone sets out that the rule framework in seeking to provide for a range of activities whilst managing and discouraging activities considered to be inappropriate, with those relevant to urban design as follows:
 - (a) Commercial activities are permitted (except for service stations) where the GFA is less than 400m² and less than 200m² for an office area. Buildings with a gross floor area (GFA) over of 400m² require consent. This seeks to manage the effects of large scale commercial activities. Building and structures must meet a number of standards to encourage positive amenity outcomes in the zone.
 - (b) Visitor accommodation and residential activities are permitted under certain circumstances. For residential activities, these must be located above the ground level of a building used for commercial purposes.
 - (c) Community facilities and emergency service facilities are permitted, subject to standards.
 - (d) Commercial services are permitted, subject to standards.
 - (e) There are a number of proposed discretionary status activities, including educational facilities, industrial activities, service stations, large format retail and retirement villages, as these

activities are associated with certain effects that may not be anticipated in the Mixed Use zone.

3.9 The standards of particular relevance to this assessment are building heights.

Existing Kerikeri Town Centre

- 3.10 The existing Kerikeri town centre serves as a commercial and retail hub within the District and appears to be busy, prosperous and a well-functioning centre. It includes a wide range of businesses and a high street environment along with civic and community activities, with a number of side streets providing additional commercial activities. The Kerikieri Domain is a key public space at the heart of the town centre, with the Police Station, Procter Library and local cinema also located in the centre.
- 3.11 The town centre includes a New World supermarket at the northern extent of the main street adjoining Clark Road, with the Woolworths supermarket at the southern extent adjoining Butler Road. These in effect 'book end' the town centre, albeit there are some commercial activities further to the south of the Woolworths and resulting in a linear focus to the centre. With the exception of Briscoes and Rebel Sports a number of large format retail stores are located in Waipapa and this draws some shoppers away from Kerikeri resulting in leakage of retail expenditure.
- 3.12 Kerikeri is similar to a number of other smaller centres across New Zealand where the focus of growth has been around the main street (Kerikeri Road), with a number of small narrow shop frontages still evident. Laneways and side streets have developed over time, extending from Kerikeri Road with a range of activities now located within blocks sitting in parallel to the main street. This layout supports a walkable centre and an attractive main street environment. However, over recent years, the street layout has resulted in traffic congestion which has impacted the overall amenity.

- 3.13 The built form character of the town centre is largely one-storey buildings, with at-grade carparking. In recent years there have been a number of new office buildings 2 3 storeys in height.
- 3.14 Within the town centre there are opportunities for site redevelopment and amalgamation, with a number of older shops, undeveloped sites and land currently being utilised for surface carparking. As such there are opportunities for intensification and growth within the centre that would further enhance the amenity and vitality of the centre. A key challenge with future development is to retain the character and identity of the town centre valued by the community, and to enhance the evening economy and tourism sector and the overall amenity and quality of the public realm. These are closely aligned with the quality and character of urban development and landscape and cultural narrative. Additional connections are also required to unlock the potential of a more accessible centre, which is likely to also assist with achieving a more legible town centre.

4. SUMMARY OF KO SUBMISSION

- 4.1 KO are seeking the introduction of a TC zone for Kerikeri in recognition of its importance as a growing centre in the Far North. The zone provisions outlined would enable buildings up to 6 storeys (22m in height) and also provide for ground floor residential activity except where a pedestrian frontage is identified.
- 4.2 The rationale for the introduction of a TC zone is outlined in the submission as follows:

"Kāinga Ora recommend the introduction of a Town Centre zone for Kerikeri township as the largest and fastest growing township in the Far North (and is consistent with National Planning Standards). The Mixed Use zone is generally supported as it provides for the existing commercial activities as well as residential activity. However, a Town Centre zone is considered more appropriate for Kerikeri as this will be in accordance with the government direction given through the NPS-UD enabling growth and investment in the

key centre of the District. Kerikeri town is of sufficient urban size and predicted growth to be given a Town Centre zoning. While it is understood that the Council is currently reviewing infrastructure assets to better understand capacity, the requirement for adequate infrastructure to be in place to support development (as set out in policy MUZ-P01 below) ensures that any infrastructure constraints will be addressed when any new development is proposed."

- 4.3 As such, Kāinga Ora submit that the proposed MU zone be replaced with a new TC Zone in Kerikeri, as shown in Appendices 3 and 5 of the submission. The spatial extent of the proposed TC zone is set out in a revised Planning Map for Kerikeri and applies to the core of the town centre of Kerikeri.
- 4.4 In terms of outcomes, Kāinga Ora submit that the new TC zone will:
 - (a) Recognise Kerikeri as an established town centre, different in size and functions (head offices, district community facilities and in proximity to airport) from other townships in Far North;
 - (b) Avoid light industrial activities to be located within the town centre of Kerikeri.
 - (c) Furthermore, Kerikeri is the town centre least affected by flooding and therefore is more suitable for intensification as other centres are affected more significantly.
- 4.5 Appendix 5 of the submission sets out the planning framework associated with the proposed Town Centre zone². These include the relevant objectives, policies, rules, standards and related matters of discretion and assessment criteria. This sets out that:

"In particular, a Town Centre zone is sought for Kerikeri to enable up to 6 storey buildings. Increased development height is sought for Kerikeri to support business and residential investment in the centre..."

² S561.117 to S561.121

4.6 Associated with a request for a TC zone for Kerikeri is the introduction of a new Medium Density Residential zone on the edge of the Kerikeri town centre, and this is addressed in separate evidence. However, it is relevant to note that this would be within a 300-500m walkable catchment around the Kerikeri town centre to enable increases intensity and support growth of the town centre (11m building height).

5. URBAN DESIGN RESPONSE

Rationale and Role and Function

- KO's rationale for the introduction of a TC zone is based on the role and function of Kerikeri as the primary centre for the Far North. Town centres are vital commercial, social, cultural and residential hubs and play a key role in the economic success of districts and regions, along with supporting community life and being important tourism destinations.
- I concur that Kerikeri is locally important and an established town centre providing for a range of functions, including head offices, District-wide community facilities and is within proximity of the Bay of Islands airport. Kerikeri is an attractive and vibrant centre with a distinctive sense of place and is an important destination for tourism, offering a range of unique experiences in the Far North. As noted earlier, the town centre is anticipated to continue to grow which will reinforce its role as the primary centre in the District. This role and function is reinforced through the growth strategy outlined in the Te Pātukurea Kerikeri Waipapa Spatial Plan.
- As outlined earlier, the intent of the MU zone is to provide for a combination of commercial and residential activities, revitalise and support business and ensure development is supported by the relevant infrastructure. This zone applies to a number of areas across the district and as such provides a general framework for managing a range of complimentary activities including residential.

- 5.4 The intent of the proposed TC zone as outlined in the 'Overview' is to focus on Kerikeri, its revitalisation as an urban centre with a greater focus on visual amenity and safety and encouraging economic and residential growth. This includes a more targeted strategy both in terms of overall urban form in the context of other centres, land uses to support the vitality of the centre and built form outcomes anticipated which have a greater focus on the public realm, character, vibrancy and amenity. The intended role and function of Kerikeri as a strategically important focal point for ongoing investment is outlined in Objective 01.
- 5.5 Taking into consideration the above, I discuss the key urban design issues based on the differences between the two zones:
 - (a) Land use activities and compatibility The MU zone emphasizes enabling a range of activities that support the existing environment, while the TC Zone focuses on accommodating activities that support the town centre's vibrancy and viability. Both zones provide for residential activities which will enhance activation and therefore the vibrancy of the centre along with community safety.

With a greater focus on the strategic importance and vibrancy and vitality of the centre, the TC zone identifies light and heavy industrial, large format retail and drive through activities (amongst others) as non-complying activities. As such, the TC zone is anticipated to encourage activities in Kerikeri town centre that are more directly compatible with its town centre role and function and discourage incompatible activities within the TC zone.

There are some activities within the existing town centre that are not an 'ideal' fit in relation to a town centre environment. There is the possibility over time that these uses may relocate to another MU or Industrial zone in the District. In relation to large format retail, as outlined earlier, these are largely based in Waipapa and under the TC zone it would be more onerous to establish in the existing town centre environment, noting that

medium format is more likely to be absorbed into the urban fabric. Although not directly relevant to this assessment, expansion of the commercial area in respond to demand may provide for large format opportunities in Kerikeri beyond the existing town centre environment. As such, there is potential for some activities to relocate out of the centre unless a more targeted precinct is identified or specified rules developed.

Albeit the differences in land use activities between the zones is subtle, the TC zone is considered to better reflect the outcomes sought for the centre and its role and function. The subtle difference is considered beneficial and is anticipated to better maintain and enhance a higher amenity town centre.

(b) <u>Growth and intensification</u> - The TC zone specifically provides for growth through intensification and increased building heights, while the MU zone focuses on ensuring development is supported by adequate infrastructure.

Providing for the social and economic needs of the District through growth and intensification (through redevelopment of underdeveloped sites and larger scale built form) will enable an efficient use of land and a greater concentration of activities in support of the centres role and function within the district. This will support a vibrant centre which includes modern fit-forpurpose buildings that will be attractive to a range of tenants. However, care must be taken to not dilute the vibrancy of the centre by providing too much capacity (i.e. through the height of buildings) and I discuss this issue later, and noting I am not a retail economics expert.

(c) Quality of development - Both zones require quality development outcomes. The TC zone has more detailed policies on achieving an attractive urban environment and managing effects on adjoining environments.

Specifically, Objective O3 of the TC zone seeks development which is "...of a form, scale and design quality that achieves a

high quality urban form that is visually attractive, safe, easy to orientate, conveniently accessible, and responds positively to local character and content." Policy P5 requires new development to be high quality in a manner that provides an attractive urban environment with a distinctive sense of place and quality public places, encourages medium to high intensity development form, and achieves the functional and operational requirements of activities within a town centre.

The TC zone policy framework is considered to be more appropriate in supporting a high quality town centre environment including a quality public realm, vibrancy and sense of place.

- In summary, generally mixed use zones align well with a broad range of activities but do not always lend themselves to achieving urban design best practice. Although the differences between the two zones are subtle in parts, the TC zone is considered to better align with the intended role and function of Kerikeri town centre within the District. It is more explicit about the activities that will contribute to its social and economic success, promote activation of the public realm and result in a higher quality of design that is reflective of the vibrancy and people-focused aspects of a town centre.
- 5.7 I consider that there is rationale for a TC zone for Kerikeri based on its role and function as the key commercial centre in the Far North, with this zone being more appropriate than the proposed MU zone as notified from an urban design perspective. I discuss building heights later in this assessment.

Spatial Extent of Town Centre Zone

The spatial extent of the proposed TC zone is set out in a revised Planning Map for Kerikeri with a extract of this area included in **Figure 2** below (pink hatched area). In effect the TC zone aligns with the MU zone, as notified. The yellow hatched area aligns with the recommended Medium Density Residential zone around the TC zone, which is discussed in separate evidence.

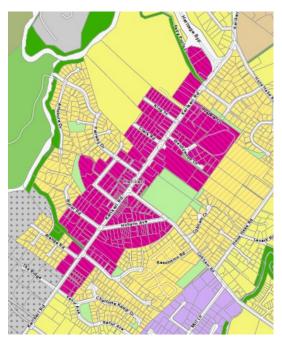


Figure 2: Extract from KO Submission showing the extent of the TC zone (pink hatched area).

- As outlined earlier, additional commercial floor space is required in Kerikeri, but this does not form part of this TC zone request. If this is implemented it would result in a larger commercial area, whether it is zoned MU or TC zone and have implications on the overall urban form of the town.
- 5.10 In considering the urban design effects associated with the proposed extent of the TC zone, it is relevant to consider the level of commercial activity and community services anticipated, its overall functionality as a commercial centre, and the ability to achieve a compact and legible centre that is highly accessible.
- 5.11 The MU zone currently aligns with the majority of the commercial and community activities in the town centre and is focused around Kerikeri Road largely 'between' the two supermarkets and extending one or two block back from the main street to the west and east. The two existing supermarkets act as a book end to the centre, and although not contributing to the main shopping street environment, does mean that the main street is clearly visible when arriving in the centre. There are a limited number of retail activities beyond the Woolworths supermarket along Kerikeri Road, which elongates the main street experience, with these falling outside what could be considered to be the core 'retail'

area. Although there is no single ideal length for a main shopping street, the overall experience is influenced by the pedestrian experience and type of businesses and currently, with Kerikeri Road in its current state (and dominated by parking and traffic congestion) diminishing the ability to achieve a vibrant pedestrian environment.

- 5.12 As mentioned earlier, there are also some activities within the centre that are not an 'ideal' fit in relation to a town centre environment and it is anticipated that there will be some change in activities over time. There are also a number of sites which require consolidation and/or redevelopment to make better use of under-utilised sites and make a more meaningful contribution to achieving a successful retail town centre environment.
- 5.13 Taking these factors into account the spatial extent for a TC zone could focus on the 'core' town centre area. However, this has to be weighed up against the future demand for commercial development. From a compact and legible urban form perspective, the existing area is walkable and is optimally positioned to be conveniently accessible to the adjoining residential catchment. It enables convenient access for parking away from the main street and provides flexibility for supporting public transport facilities in the centre in the future. In addition, if a core retail area was to be identified this would assume that the remaining area was to be retained as MU zone and potentially a different scale and form of development. This would need to be considered in relation to a transition to residential walkable catchment and could impact the quality of environment adjoining residential areas.
- 5.14 Given a focus on the future state, there is a rationale for adopting the same spatial extent of the MU zone for a TC zone. From an urban design perspective, this change will have little or no effect, with no mitigation measures recommended, noting height limits are discussed in the following section.

Built Form Outcomes

5.15 A number of built form standards are set out for each of the two zones with **Table 1** providing a high level summary.

Table 1: Built form standards for the MU and TC zones

| Standard | PDP Mixed Use Zone | KO Town Centre Zone |
|--|---|---|
| Maximum Height | 12m above ground level, with specific limits for certain areas. | 22m above ground level. |
| Height in Relation to Boundary (Recession Planes) | 55° at 2m (north) 45° at 2m (east/west) 35° at 2m (south) | 60° at 4m above ground level when adjoining certain zones |
| Setbacks | 3m from boundaries of certain zones. | 3m from boundaries of certain zones. |
| Setback from MHWS | 26m from MHWS. | Not specified. |
| Pedestrian Frontages | 65% clear glazing at ground floor, principal public entrance on front boundary. | 65% clear glazing at ground floor, principal public entrance on front boundary. |
| Verandahs | Continuous pedestrian coverage, specific height (3m-6m) and setback (300mm-600mm) requirements. | Continuous pedestrian coverage, specific height (3m-6m) and setback (300mm-600mm) requirements. |
| Outdoor Storage | Fully screened by a solid fence or wall of a minimum height of 1.8m. | Not specified. |
| Landscaping and Screening on Road Boundary | 50% of road boundary landscaped. | Not specified. |
| Landscaping for Sites Adjoining Non-Mixed Use or Industrial Zones | Fenced or landscaped with specific height requirements. | Fenced or landscaped with specific height requirements. |
| Coverage | 10% of the site planted or landscaped. | Not specified. |

- 5.16 Of specific relevance to urban design is the maximum height limit and the impact this will have on the overall urban form of Kerikeri. As outlined above, the proposed MU zone includes a maximum height limit of 12 metres above ground level (3 storeys), with a range of matters of discretion if this standard is not met. The TC zone proposes a maximum height limit of 22 metres (6 storeys) with the same matters of discretion. The rationale for the increase in not specifically identified but is understood to be in response to recognising Kerikeri as an established town centre, different in size and functions (head offices, district community facilities and in proximity to airport) from other townships in Far North, along with encouraging higher intensity development.
- 5.17 In considering the potential effects that can occur when a greater building height is allowed, key urban design matters can include the following, noting that some of these matters are identified as matters of discretion:
 - (a) Building appearing overbearing and over proportioned in relation to human scale;

- (b) Contrast to existing smaller scale buildings;
- (c) A change in character and loss of identity;
- (d) A loss of openness and visual connection with the natural landscape;
- (e) Uneven built form and inconsistent density within a centre causing an imbalance in activity levels;
- (f) Loss of sunlight on the public realm and key open spaces; and
- (g) Poor built form legibility and understanding of the built environment.
- As outlined earlier, the majority of buildings in Kerikeri are 1-storey in height, with a smaller number of 2-storey buildings developed in more recent years, providing modern footprint buildings with larger footplates. There is one 3-storey building. Some of the larger scale buildings align with key corners within the town centre. The lower scale of development and smaller footprint buildings in part contributes to the 'village character' and identity. A largely consistent built form supports a coherent collection of buildings particularly along the Kerikeri Road. I am mindful of these local characteristics in considering how growth and development can be achieved in a cohesive and efficient way.
- 5.19 Development of buildings up to 6 storeys in height (22m) would result in development that would be more visible within Kerikeri town centre and the wider context given the local topography. It would result in a greater range of building heights across the centre and a change in character.
- 5.20 From an urban form perspective, it is relevant to note KO's submission seeking a Medium Density Residential zone adjacent to the town centre (by way of a 300-500m walkable catchment) to enable increased intensity and support town centre growth, with a 11m height limit sought (1m less than the MU zone height limit of 12 metres). In principle I support the concept of residential intensification around town centres by way of a walkable catchment, given it enables a transition in the

scale and form of development (stepping down) as you move away from the centre of town to the wider residential area and accessibility reduces. In the Kerikeri context it assists to reinforce the primacy of the town centre and will achieve a logical urban form strategy to support the town centre, future public transport and other economic growth factors in the longer term. I discuss this issue in more detail in separate evidence but note that if the MU zone height of 12 metres is maintained it would largely align with the 11 metres requested adjoining the centre and result in an poor urban form relationship and lack of a legible centre from a height perspective.

- I consider that the proposed 12 metre height limit enables a well-proportioned 3-storey building with a parapet/roof form and screening for roof plan. This could include a 3.5-4m ground floor retail or hospitality activity, with two upper floors (3-3.5m) allowing for a mix of commercial or residential activities. This format of building would support a human scale development, as is evidenced in recent development of 2 and 3 storey buildings and maintain the character and sense of place.
- I acknowledge that Kerikeri is the key centre in the District and the centre is experiencing growth. As outlined earlier, additional commercial land is required in Kerikeri to meet demand. However, the town is a Tier 3 scenario and is constrained in relation to public transport. Looking ahead I consider that a 22 metre height limit (6 storey building) would give rise to adverse urban design effects in the Kerikeri context and would not be compatible with the finer grain nature of the town centre. I am concerned that the 'doubling' of capacity could result in a focus on a small number of taller buildings and a lack of regeneration of the overall town centre (i.e. issues in relation to commercial distribution).
- I do however consider that from a urban form perspective there is an opportunity for some additional height beyond the 12 metre limit in achieving an effective urban form for the town. I consider that an additional storey enabling a 4 storey building (15 or 16 metre height limit) would be appropriate and unlikely to result in significant adverse

height effects. This approach would avoid a spike in the height range, achieve a more consistent built form outcome and a logical urban form from a broader town perspective, and comprising a good baseline. This would better support an intensity of commercial activity distributed across the town centre as a whole. I also consider that the height limit (in conjunction with intensification) is commensurate with the level of commercial activity and community services anticipated and noting a lack of a public transport system currently.

- I note that the height in relation to boundary provisions are proposed to be revised, with a 60 degree and 4m above ground level standard alongside and rear boundaries with sites zoned Residential, Rural Residential, Rural Lifestyle etc, with no road boundary recession plane with the assumption buildings are built up to the street edge. When combined with height limits these are effective mechanism to maintain sunlight access to sensitive public open spaces, public realm and outdoor living spaces within adjoining residential properties. Given a height limit of 15 or 16m I do not consider that a recession plane provision to manage a road wall height is necessary.
- 5.25 Overall, and subject to a change to the height limit, I consider that the built form outcomes of the TC zone provide an appropriate suite of standards for the Kerikeri context.

6. CONCLUSION

- 6.1 KO have requested the introduction of a TC zone for Kerikeri in recognition of its importance as a growing centre in the Far North. This would apply to the existing MU zone extent. The zone provisions outlined would enable buildings up to 6 storeys (22m in height) and also provide for ground floor residential activity except where a pedestrian frontage is identified.
- 6.2 From an urban design perspective, a TC zone as composed is well conceived and sound in its execution. The Kerikeri town centre is acknowledged as the primary centre within the District and is

anticipated to continue to grow. A TC zone would provide a sound foundation for future land use design and consenting.

- 6.3 The strategy of enabling greater height up to 22 metres as a permitted activity is however considered to have adverse urban design effects and is not considered appropriate. In order to achieve a more consistent built form outcome and a logical urban form for the town a revised height limit of 15 or 16 metres is considered most appropriate in the context. This would comprise a good baseline and better support an intensity of commercial activity distributed across the town centre as a whole.
- 6.4 In conclusion, I consider that the TC zone, with the associated controls are suitably robust and comprehensive and will contribute to achieving a mix of town centre activities and a high quality amenity anticipated for a centre of this nature, noting the recommended change to the maximum height limit.

Jane Rennie 20 June 2025

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