

Memorandum

Christchurch

Level 1
141 Cambridge Terrace
Christchurch 8013
PO Box 110
Christchurch 8140

+643 366 8891

Attention:	Jermone Wyeth / Sarah Trinder
Company:	Far North District Council
Date:	28 November 2025
From:	Jane Rennie, Urban Designer / Partner
Message Ref:	KFO Submission – Hearing 15D – Urban Design Right of Reply
Project No:	BM250224

Introduction and Scope of Memorandum

1. My name is Jane Maree Rennie. I am an Urban Designer and Partner with Boffa Miskell Limited. I have set out my relevant qualifications and experience in previous evidence¹ and agree to comply with the Environment Court's Code of Conduct.
2. This Urban Design Technical Memorandum has been prepared on behalf of Far North District Council ('Council'). It relates to the Kiwi Fresh Orange Company Limited submission ('KFO') on the Far North District Proposed District Plan ('PDP'). The Memorandum outlines my written response to a number of issues raised during the KFO hearing (Hearing 15D). Of relevance to the issues covered is my Urban Design response to the Vision Kerikeri submission as part of Hearing 14².
3. This Memorandum covers the following topics, with the format aligning with the structure of the Legal Submissions:
 - a) Issues raised with the recommended proposed District Plan ('PDP-R'):
 - i. Approach to Intensification
 - ii. Lack of Consideration of Urban Design
 - b) KFO Proposal:
 - i. Key Issue 1 - Unsecured Access
 - ii. Key Issue 3 - Uncertain Development Outcomes

¹ Evidence in response to Kainga Ora, Turnstone Trust and Kiwi Fresh Orange on behalf of FNDC

² Urban Design response to Vision Kerikeri Evidence, Hearing 14, 8 September 2025

iii. Key Issue 6 – Urban Form

4. I confirm that the urban design concerns I have identified with the KFO Proposal and discussed in my Evidence in Chief and Summary Evidence remain.

Issues raised with the PDP-R – Approach to Intensification

5. There was discussion during Hearing 15D on consolidation of the urban area vs intensification in providing for the required housing capacity, with KFO contending that an intensification outcome is being 'forced' rather than 'enabled'.
6. To clarify, through the Spatial Plan the growth strategy is to promote a consolidated urban form that has less focus on large-lot development which has in the past had a detrimental impact on achieving a sustainable urban development pattern and avoiding urban sprawl. The PDP-R includes intensification in and around the Kerikeri town centre through the introduction of a Medium Density Residential Zone ('MDRZ') and primarily detached housing through the Residential General Zone ('RGZ'). In addition, a significant area of greenfield expansion is identified in the Spatial Plan and will be considered through a separate future plan change.
7. This overall approach to growth will enable the required residential capacity and gives effect to Tier 3 policy considerations under the National Policy Statement Urban Development ('NPS-UD'), in particular Policies 1, 2 and 5. This approach is considered to enable a range of living preferences, including different types, sizes and locations of housing, and not favouring one over the other.

Issues raised with the PDP-R - Lack of Consideration of Urban Design

8. Mr Neill outlined criticism regarding the absence of urban design considerations in relation to the development of the PDP-R, specifically the MDRZ and Town Centre Zone ('TCZ'). I reiterate that:
 - a) The TCZ and MDRZ are situated within an already urbanised context, distinct from the rural land subject to potential future urbanisation. This existing urban environment inherently provides a baseline for development expectations.
 - b) Through my Hearing 14 evidence, I have assessed a number of urban design matters relevant to the consideration of the two zones, with recommended changes to the spatial extent of the TCZ and building heights.
 - c) In my response to the Vision Kerikeri submission I have recommended the introduction of a Height in Relation to Boundary ('HIRB') rule for the TCZ and a requirement for an Urban Design Assessment in certain circumstances to further strengthen the ability to secure positive urban design outcomes.
9. As such, urban design considerations have been integrated through evidence-based recommendations on zone boundaries, building heights, and additional rules such as HIRB and

Urban Design Assessments, that will assist in ensuring positive urban design outcomes within the existing urban context of the TCZ and MDRZ.

10. As outlined in my Hearing 14 urban design response³, the Te Pātukurea Spatial Plan ('Spatial Plan') includes an analysis of future changes to Kerikeri's built form arising from intensification in and around the town centre, including medium density development within a walkable catchment. This analysis provides an indication of how urban change could occur and what it might look like. The Spatial Plan also signals further urban design work for Kerikeri and Waipapa. The Implementation Plan identifies the development of an Urban Design Framework and Structure Plans for Kerikeri and Waipapa intended to guide future urban change with more targeted planning provisions, including design guidelines for town centre and medium density development. In addition, the Greenfield areas identified in the Spatial Plan will be considered through a separate future plan change, enabling more comprehensive consideration of urban design issues specific to those areas, including housing diversity and choice within Kerikeri.
11. These future workstreams are the appropriate mechanism for determining the scope and nature of master plans and design guidelines and how these can be integrated into the District Plan over time.

KFO Proposal – Key Issue 1 (Unsecured Access)

12. There is no certainty that the KFO Proposal will include a road connection between the Site and Kerikeri (Access C). The lack of a direct road connection to Kerikeri is a significant concern and does not align with good practice urban design from a connectivity and urban integration perspective. Connectivity is one of the seven principles (known as the 7C's) under the NZ Urban Design Protocol, and which is an evaluation criteria under the Northland Regional Policy Statement. If there is no provision of a road connection, this further exacerbates my concerns about the Proposal potentially creating an isolated development area. A pedestrian/cycle connection only is not considered to be sufficient from an accessibility perspective given the nature and scale of the Proposal.
13. I reiterate Mr Collins point that a lack of a road connection also makes it very difficult to plan for a future public transport network connection through the Site that directly links to and from Kerikeri in the future.

KFO Proposal – Key Issue 3 (Uncertain Development Outcomes)

14. Albeit Mr Neil provided some further understanding of the 'aspirations' for the KFO Site at the hearing, there remains no certainty of achieving the outcomes he outlined given they are not clearly articulated in the planning framework. In addition, and as outlined in questioning by the Panel, there is a disconnect between the graphic renders outlined by Mr Neil and the Precinct provisions. The renders imply a greater density of development than provided for through development of lots of

³ *Hearing 14 – Urban Design Response to Vision Kerikeri Evidence, 8 September 2025*

600-800sqm, up to 1,000sqm and between 2000-4000sqm, unless a 'superlot' approach is adopted, which is not the case.

15. I note that the renders better align with the urban form outcomes that I consider in my evidence in terms of intensification within a central location and around key nodes aligning with the NPS-UD principles. However, this is not what is included in the Precinct Plan diagram or the zone provisions.
16. I disagree with Mr Neill's assertion that the Comprehensive Development Requirement, as part of the Precinct and Structure Plan, will establish clear expectations for decision-makers in relation to urban design. As outlined in my evidence-in-chief, the Precinct provisions lack a place-based framework, thereby falling short in relation to 'sound place making' a key consideration highlighted by Mr Neill. In my view, they do not provide sufficient assurance of achieving good practice urban design outcomes. While the inclusion of an Urban Design Assessment in the decision-making process is a positive step, it does not compensate for the fundamental shortcomings in the Objectives, Policies, and Matters of Discretion and incorporation of appropriate urban design principles. The provisions fall well short of addressing key urban design principles, particularly in relation to built form, layout, connectivity, and land use.

KFO Proposal – Key Issue 6 (Urban form)

17. I remain concerned about the urban design effects of the spatial extent and nature of the proposed Mixed Use Zone commercial area on the urban vitality of Kerikeri, given the description of the likely land uses. I reiterate my concern that it will create a 'third' commercial area, with a neighbourhood centre considered more appropriate in supporting the new residential catchment. To clarify, provision of medium format and large format retail is enabled in the expanded Kerikeri town centre, including on the Turnstone Site and noting that likely provision of a bypass supporting enhanced accessibility of this commercial core.
18. Given concerns in relation to the size of the zone, I do not consider this urban form matter should be assessed at the Comprehensive Development Plan stage.