

**BEFORE A HEARINGS PANEL
OF THE FAR NORTH DISTRICT COUNCIL**

I MUA NGĀ KAIKŌMIHANA MOTUHAKE O TE HIKU O TE IKA

Under the	Resource Management Act 1991 (RMA)
In the matter	of a request for rezoning of land in the Kerikeri-Waipapa area under the proposed Far North District Plan

**SUMMARY STATEMENT OF EVIDENCE OF AZMAN REUBEN IN SUPPORT OF SECTION 42A
REPORT FOR HEARING 15D**

TE PATUKUREA - KERIKERI-WAIPAPA SPATIAL PLAN

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1. INTRODUCTION

1.1 My name is Azman Reuben. I prepared a statement of evidence in relation to a rezoning request by Kiwi Fresh Orange Company Limited (**KFO**) in the Kerikeri-Waipapa area under the proposed District Plan of the Far North District Council (**Council**). I refer to my qualifications and experience in my original statement, dated 10 September 2025, and do not repeat those matters here.

1.2 The purpose of this statement is to provide a brief summary of my evidence, and to provide an initial response to the rebuttal evidence of KFO, noting that a full right of reply will be provided by the s 42A team (including additional expert input as required) following the hearing.

2. SUMMARY OF EVIDENCE

Reasons for initiating the Spatial Plan process and summary of background

2.1 The Council initiated the Te Pātukurea – Kerikeri Waipapa Spatial Plan (**Spatial Plan**) in 2021 to update the 2007 Structure Plan, address growth, and adopt best-practice spatial planning. The Spatial Plan was supported by a formal governance structure, notably the Hapū Rōpū, who endorsed key milestones and recommended the draft Spatial Plan to elected members.

2.2 The development of the Spatial Plan was paused in late 2022 due to the Proposed District Plan (**PDP**) process and resumed in mid-2023, at which point a revised project programme was developed.

Purpose of the Spatial Plan

2.3 The Spatial Plan is a Council-adopted document that sets out the strategic direction for urban growth within Kerikeri-Waipapa over a 30-year period, identifying preferred areas for residential, commercial, and industrial development, alongside the infrastructure required to support this growth. The Spatial Plan was developed in accordance with good practice for Future Development Strategies and aligns

with the principles of the National Policy Statement on Urban Development (NPS-UD), despite the Council not being a Tier 1 or 2 local authority.

Approach to Growth Planning

- 2.4** The Spatial Plan adopts an aspirational “Blue Sky” population growth projection, reflecting historical trends of growth exceeding projections in Kerikeri-Waipapa. This approach ensures that sufficient capacity will be enabled while allowing development to be staged in line with demand. It prioritises compact, infrastructure-efficient development within and around existing urban areas.

Process for developing the Spatial Plan

- 2.5** The Spatial Plan was developed through a series of phases, as outlined below:¹

- (a) Phase 1: Early engagement and establishment.
- (b) Phase 2: Framework Document.
- (c) Phase 3: Foundation Report.
- (d) Phase 4: Growth Scenarios Report.
- (e) Phase 5: Public Engagement.
- (f) Phase 6: Development of the Draft Spatial Plan.
- (g) Phase 7: Public Consultation on the Draft Spatial Plan.
- (h) Phase 8: Spatial Plan Adoption.

- 2.6** These phases are explained in more detail in my statement of evidence.

¹ The following refers to the revised project programme from mid-2023 onwards.

Evaluation of Growth Scenarios

- 2.7** Growth scenarios A to F were developed and assessed through a multi-criteria analysis (**MCA**), incorporating technical, cultural, environmental and community considerations. A hybrid scenario combining Scenarios D and E (focussing growth in Kerikeri South and Waipapa) was selected as the preferred growth strategy. This approach supports infrastructure efficiency, aligns with community aspirations, and promotes a well-functioning urban environment.

Medium Density Residential Zone and Town Centre Zone and how it aligns with outcomes sought by the Spatial Plan

- 2.8** The Medium Density Residential and Town Centre zones recommended in the s 42A report closely align with the direction set by the Spatial Plan, particularly with the principle of achieving a compact and efficient urban form.
- 2.9** The Medium Density Residential Zone and Town Centre Zone within Kerikeri will work synergistically to support the growth of Kerikeri's urban environment and strengthen commercial activity while also enabling the development of more affordable housing within surrounding walkable catchments.

KFO rezoning under the Spatial Plan

- 2.10** The full extent of the landholding subject to the KFO submission to the PDP was not included in the initial set of growth scenarios, primarily due to the presence of significant flooding across much of the site. However, while it did not meet all criteria for growth as set out in the Spatial Plan's Framework Document, it was included in the public engagement process in recognition of the level of community interest. It was named Scenario F.
- 2.11** Following public engagement on the growth scenarios, the evaluation process was carried out in stages. The first stage included the infrastructure cost analysis, an MCA by subject matter experts, and a cultural analysis by the Hapū Rōpū. These results were then reviewed alongside public engagement feedback.

- 2.12** Scenario F performed poorly across multiple evaluation criteria:
- (a) it ranked second to last in the public engagement results;
 - (b) it ranked the lowest in the Hapū Rōpū cultural analysis; and
 - (c) it scored lower in the subject matter expert MCA for reasons outlined in my original statement.
- 2.13** As a result of the growth scenarios evaluation, Scenario F was not included in the draft Spatial Plan.
- 2.14** In the consultation on the draft Spatial Plan, the inclusion of Scenario F emerged as a strong theme from submissions on the draft Spatial Plan, particularly among those who did not support the draft Spatial Plan.
- 2.15** In response to these submissions, the project team, with the support of subject matter experts, re-evaluated the feasibility of integrating the unconstrained portions of Scenario F into the Spatial Plan, whether partially or fully. After completing this assessment, the project team concluded that Scenario F does not represent the most suitable outcome for the long-term urban growth of Kerikeri and Waipapa, both in part and full. This is set out in more detail within the Deliberations Report provided in **Appendix 1** of my original statement.
- 2.16** The Council formally adopted the Spatial Plan based on the hybrid growth scenario. However, since a significant number of public submissions supported Scenario F, the Council has acknowledged that support by including Scenario F in the final plan as a "Contingent Future Growth Area".
- 2.17** Scenario F was included in the Spatial Plan as a "Contingent Future Growth Area," subject to certain conditions. The Council's resolution specified that Scenario F is not part of the 30-year growth plan, and it is not incorporated into infrastructure planning or costing within the adopted plan.

- 2.18** Any consideration of whether Scenario F should be activated for future urban growth is more appropriately addressed through a future review of the Spatial Plan, prior to any rezoning of the land in the PDP.

Other matters arising from the KFO evidence

- 2.19** Ms. O'Connor's planning evidence, provided on behalf of KFO, states that the Spatial Plan "seeks to provide future capacity largely through intensification within the existing urban areas of Kerikeri and Waipapa."² However, this does not align with the assumptions in the Spatial Plan, which indicate that in Kerikeri approximately 60–70% of capacity is planned for greenfield areas, and in Waipapa about 80% is allocated to greenfield. While the plan supports a compact urban form and intensification where appropriate, it also provides for substantial greenfield expansion in targeted locations aligned with infrastructure delivery. However, rezoning of these areas targeted for greenfield expansion is not within the scope of submissions on the PDP.
- 2.20** Ms. O'Connor's planning evidence on behalf of KFO suggests that the conditions set out in the Spatial Plan for identifying Scenario F as a "Contingent Future Growth Area" have either been met or can be secured through the proposed Precinct included in the rezoning submission.³ However, for the reasons outlined in my statement of evidence regarding the evaluation of Scenario F, whether these conditions can be met requires careful assessment, and at this stage there is insufficient information to provide certainty that the conditions can be met. At this stage, I consider that the conditions outlined for the Contingent Future Growth Area have not been met.

² Statement of Evidence of Burnette Anne O'Connor on behalf of Kiwi Fresh Orange Company Limited (Planning), 30 June 2025 (**O'Connor Evidence**) at [32].

³ O'Connor Evidence at [35].

3. RESPONSE TO MATTERS RAISED IN KFO REBUTTAL EVIDENCE

- 3.1 In response to the rebuttal evidence of Ms O'Connor I make the following further comments.
- 3.2 Ms O'Connor's statement that the PDP should include 70% of growth in greenfield areas⁴, as suggested by the spatial plan, does not reflect the intent of the spatial plan, which anticipates a phased approach to plan changes and infrastructure delivery rather than immediate zoning of all capacity. I do not agree that the full greenfield allocation should be provided immediately by the PDP, especially noting the evidence of Mr McIlrath that there is sufficient development capacity across the entire district and Kerikeri-Waipapa, with a deficit position remaining under the PDP-R *only* for detached dwellings *over the long term* in Kerikeri Waipapa i.e. the only deficit occurs beyond the life of the PDP.
- 3.3 From a Spatial Plan perspective, Ms O'Connor's statement that further consultation on the inclusion of Scenario F⁵ in the PDP is unnecessary does not align with the Council's resolution from its 18 June 2025 meeting⁶. The resolution specifies that adding Scenario F as a Contingent Future Growth Area does not change the adopted scenario or infrastructure planning, and its formal inclusion will require additional consultation or plan review. While the Council acknowledged public interest in Scenario F, it has not endorsed it and has indicated that further consultation is necessary.
- 3.4 Due to the uncertainty regarding Scenario F's ability to satisfy the conditions outlined in the Council resolution, it is my opinion that this scenario should be considered through a future planning process if supported by a review of the Spatial Plan.

4 Statement of Rebuttal Evidence of Burnette Anne O'Connor on behalf of Kiwi Fresh Orange Company Limited (Planning), 24 September 2025 (**O'Connor Rebuttal Evidence**) at [82].

5 O'Connor Rebuttal Evidence at [83].

6 Pages 2-4 of Minutes of Far North District Council 18 June 2025 Extraordinary Council Meeting - https://infocouncil.fndc.govt.nz/RedirectToDoc.aspx?URL=Open/2025/06/CO_20250618_MIN_2922_EXTR A.PDF

- 3.5** Ms O'Connor's statement that the Council's approach to providing Hapū Rōpū with information was misleading⁷ is not accurate. In the briefing pack provided to the Hapū Rōpū regarding Scenario F, the project team included technical information relating to the servicing strategy and indicative roading layout. This material was reflected in the assessment of Scenario F, which formed part of the Cultural Impact Addendum released during the growth scenarios engagement. Given the volume of documentation associated with the KFO submission, the project team presented a summary of relevant information in a neutral and accessible format. As all KFO submission documents are publicly available, the suggestion that information was withheld is unfounded.

4. CONCLUSION

- 4.1** I support recommendations to rezone land where the outcome achieved from the submission aligns with the strategic direction set out in the Spatial Plan. This includes support for the Town Centre and Medium Density Residential Zones, which reflect the compact, infrastructure-efficient approach promoted in the Plan.
- 4.2** I do not support the rezoning of Scenario F for urban development at this time. In my opinion, rezoning the land under the PDP would be inconsistent with the adopted Spatial Plan and undermines the Council's ability to deliver coordinated, infrastructure-supported growth in the right locations. This could result in less efficient outcomes and compromise the integration of land use and infrastructure planning. Any consideration of rezoning Scenario F for urban development should be addressed through a future planning process if supported by a review of the Spatial Plan.

Azman Reuben

6 October 2025

⁷ O'Connor Rebuttal Evidence at [86].