

**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 JANE MAREE RENNIE IN SUPPORT OF SECTION
42A REPORT FOR HEARING 15D**

URBAN DESIGN

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Sarah Mitchell / Tim Fischer

T: +64-9-358 2222

sarah.mitchell@simpsongrierson.com

tim.fischer@simpsongrierson.com

Private Bag 92518 Auckland

1. INTRODUCTION

1.1 My name is Jane Maree Rennie. I prepared a statement of evidence in relation to a rezoning request 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 the Kiwi Fresh Orange Company Limited (**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

2.1 The KFO Site is located between Waipapa and Kerikeri, bordered by State Highway 10, the Bay of Islands Golf Club, and the Kerikeri River. It comprises mostly flat pastoral land with some moderate slopes and includes indigenous vegetation and a wetland in the eastern portion. The KFO proposal seeks urban development to meet anticipated housing and business demand.

Urban form, character and connectivity of the KFO proposal

2.2 As set out in my evidence, it is my opinion that the proposed urbanisation of the KFO Site will have several adverse urban design effects on the overall urban form of Kerikeri and Waipapa, its character and overall connectivity. Having reviewed the KFO urban design rebuttal evidence my position remains unchanged.

2.3 My key conclusions include:

- (a) **Loss of local character and identity** - Kerikeri and Waipapa are spatially distinct urban areas, with their own role, function, and urban character. The KFO proposal risks undermining these differences by introducing a development that is not well integrated with either town. This would

diminish the unique character, valued qualities and the role and function of both towns.

- (b) **Compromised urban boundaries** - The proposal would alter the current urban edges, weakening existing defensible boundaries that help manage growth, likely leading to urban sprawl in the future.
- (c) **Inefficient urban growth** - The proposal will not support a compact and efficient growth pattern, undermining the ability to achieve a compact and consolidated urban form for Kerikeri and Waipapa as envisioned in the Te Pātukurea Kerikeri-Waipapa Spatial Plan (**Spatial Plan**).
- (d) **Poor connectivity and integration** - The proposal lacks meaningful integration with the existing urban areas and is constrained by physical barriers such as floodplains, topography, the golf course, and natural features. Access to Kerikeri is unconfirmed with provision TPW-S2 indicating that access for up to 1,600 dwelling will rely on SH10 and Waitotara Drive. These constraints and the road layout indicated will limit accessibility and challenge the claim of achieving 'seamless' connectivity through the proposed Structure Plan.
- (e) **Risk of isolated, low density development** - Given the lack of integration and the physical constraints of the site, there is a risk that the development will become an isolated enclave or evolve into fragmented, low-density subdivisions and private car dependency. This outcome would further compromise the ability to deliver a compact, cohesive urban form as envisioned in the Spatial Plan and the Proposed District Plan (**PDP**).

Proposed District Plan – Recommendations Version option to provide development capacity

- 2.4** The Spatial Plan sets out a preferred approach for managing growth and my evidence for Hearing 14 addresses these approaches. As set out in my evidence, it is my opinion that the Spatial Plan directs growth to occur within and immediately

adjacent to the existing built environments of Kerikeri and Waipapa and away from rural areas. While changes to the PDP will help implement the intensification aspects of the Spatial Plan, further expansion to the south of Kerikeri and north of Waipapa should be considered through future planning processes. From an urban design perspective, this targeted growth strategy is preferable to the dispersed development proposed by KFO.

Internal layout of the KFO proposal

- 2.5** As set out in my evidence, it is my opinion that the internal layout of the KFO proposal has not been adequately tested, raising concerns about adverse urban design outcomes. There is no clear built form strategy to accommodate 1,500 – 2,000 dwellings suggesting a low-density outcome and inefficient use of currently rural-zoned land. The layout promotes private car dependency and does not adequately support multimodal transport options. A large Mixed Use area risks creating a separate, competing commercial node within the Waipapa/Kerikeri context, rather than reinforcing existing centres.

Policy evaluation

- 2.6** As set out in my evidence, it is my opinion that the KFO proposal does not give effect to the National Policy Statement on Urban Development 2020 due to concerns around car dependency, urban sprawl, and impacts on existing centres. It also fails to align with the Northland Regional Policy Statement, particularly regarding connectivity, housing diversity, and urban design principles. While there is some alignment with the PDP, the proposal lacks sufficient commitment to compact form, housing diversity, and infrastructure clarity. I consider that the proposed rezoning will not achieve a well-functioning urban environment, including a compact and consolidated urban form.

Proposed plan provisions

- 2.7** The Structure Plan outlines a range of aspirations and design principles. However, as set out in my evidence, it is my opinion that these aspirations and principles are

not translated into place-based urban design provisions or policies within the Precinct Chapter. There is little clarity on how the site's unique qualities and overall vision will be achieved through the proposed framework. There is no mandatory requirement to implement the Comprehensive Development Plan (**CDP**), which significantly limits its effectiveness in securing quality urban design outcomes. Although a Precinct Plan is included (derived from the Structure Plan), the rules do not require compliance with it, further weakening its influence. As a result, I do not consider the proposed consenting pathway provides sufficient certainty or a robust assessment framework, particularly given the lack of emphasis on urban design outcomes in the objectives and policies. This may lead to disjointed, *ad hoc* development. Additionally, I consider the Precinct Plan itself to have several shortcomings.

3. RESPONSE TO MATTERS RAISED IN KFO REBUTTAL EVIDENCE

- 3.1** In response to the rebuttal evidence of Mr Neill, I make the following initial comments to assist the Panel. I understand that a full right of reply will be provided by the s 42A team (including additional expert input as required) following the hearing.

Lack of certainty

- 3.2** I disagree with Mr Neill's assertion that the CDP requirement, as part of the Precinct provisions and associated plan, will establish clear expectations for decision-makers in relation to urban design.¹ As outlined in my evidence, it is my opinion 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. There remains no reference to the Precinct Plan (i.e. the Structure Plan which Mr

¹ Statement of Rebuttal Evidence of Grant Neill on Behalf of Kiwi Fresh Orange Company Limited (Urban Design), 24 September 2025 (**Neill Rebuttal Evidence**) at [14].

Neill has focused his consideration of key urban design issues on) in the CPD rule (and there are still inconsistent references to a Precinct Plan vs Structure Plan). The overall framework falls well short of addressing key urban design principles, particularly in relation to built form, density of development, layout, connectivity, and land use.

- 3.3** I disagree with Mr Neill's assertion that the urban design principles that I have considered in my analysis of the KFO proposal are more relevant for a larger metropolitan area. Good practice urban design principles (and the concept of a well-functioning urban environment) apply across a range of scales.

Loss of local character and erosion of town identity

- 3.4** Mr Neill acknowledges that "while the proposal will clearly alter the character of the currently largely rural land it is located on, it will not alter the character or qualities of the Kerikeri and Waipapa townships themselves."² However, his assessment then shifts focus to potential future changes in built form within the existing urban environment, without adequately addressing the effects of urbanising the site on the broader setting of both towns. It is unclear why Mr Neill does not consider the impact of the proposal on the towns' roles, functions, and their physical separation. In my view, the extent of change to the overall urban form of the area has been significantly understated.

- 3.5** In response to Mr Neill's criticism regarding the absence of an urban design framework for development within the Medium Density Residential Zone (**MDRZ**) and Town Centre Zone (**TCZ**), I note that these zones 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, and I consider that the proposed TCZ will assist with the urban hierarchy. As correctly identified, the introduction of an Urban Design Framework and Structure Plan is recommended for both Kerikeri and Waipapa as set out in the Spatial Plan to guide future development in these areas. Furthermore,

2 Neill Rebuttal Evidence at [18].

as outlined in my reply to the evidence of Vision Kerikeri,³ I have recommended that the relevant assessment matters be refined to further strengthen the ability to secure positive urban design outcomes.

- 3.6** Importantly, I reiterate that a significant area of greenfield expansion identified in the Spatial Plan is intended to be addressed through a separate future plan change. This process allows for a more targeted and comprehensive consideration of urban design issues specific to those areas including the nature of housing to address both diversity and choice within Kerikeri. I reiterate that the KFO proposals lack of attention to the provision of housing choice makes it unsuitable to rezone for urban development through the PDP from an urban design perspective. In this context, it is both appropriate and necessary to distinguish between the planning responses required for established urban zones and those for future greenfield development.

Compromised urban boundaries

- 3.7** I strongly refute Mr Neill's assertion that the southern edges of the Spatial Plan greenfield area in Kerikeri lacks a strong or defensible boundary.⁴ In reality, the boundary is clearly defined by existing landscape features and is further constrained by the presence of highly productive soils (LUC 2) further to the south. These natural and environmental limitations make urban expansion beyond the Spatial Plan area both impractical and highly unlikely in the future. In contrast, the KFO Structure Plan diagram explicitly identifies areas for future urban expansion that extend into the wider rural landscape. This signals a clear intent to urbanise land that is currently rural, which raises concerns about the long-term integrity of the rural-urban interface.

Jane Rennie

6 October 2025

³ Hearing 14 Urban Zones, Section 42A Report Writers Right of Reply, Appendix 3.

⁴ Neill Rebuttal Evidence at [29].