

Memorandum



To Jerome Wyeth
Technical Director - Planning, SLR

From Melean Absolum
Landscape Architect, MALtd

Date 29 August 2025

Dear Jerome,

SUBMISSION 320 FAR NORTH HOLDINGS LIMITED, OPUA

INTRODUCTION

This memorandum records my response, on behalf of Far North District Council (FNDC), to the rebuttal evidence provided on behalf of Far North Holdings Ltd's (FNHL) by their planner, Mr Steven Sanson, and landscape architect Mr Simon Cocker, in relation to the rezoning of a number of sites around Opuia, including the Marina. It has been prepared prior to the start of Hearing 15B and may need to be updated after hearing evidence from FNHL during the course of the hearing and potentially as part of a wider right of reply.

The new information I have considered comprises:

- Rebuttal evidence of Mr Sanson, dated 18 August 2025;
- Appendix B - the proposed Precinct Provisions, and;
- Appendix D - Memo from Simon Cocker Landscape Architecture, dated 18 August 2025.

CHANGES TO EARLIER MEMO

I note a number of differences between the memo from Mr Cocker, provided by Mr Sanson with his memo dated 7 July 2025,¹ and the Cocker memo attached to Mr Sanson's rebuttal evidence.

Of particular note is the change to Figure 2b in Attachment 1 of Mr Cocker's memo. This plan illustrates his recommendations with respect to mitigation of the Marine Business Park site. In the earlier version of Figure 2b Mr Cocker had a 40m deep building set-back from the road, the front 6-8m of which was notated as a landscape buffer strip. The revised Figure 2b shows a 30m building set-back line with a 15m deep wetland/native screen planting area along the road frontage.

In my opinion the reduced width of the building set-back will be largely off-set by the additional width of the planted buffer strip along the road frontage. Although new buildings will potentially be 10m closer to the road than shown in the earlier plan, the depth of planting along road frontage, together with the building height restrictions shown in the revised Figure 3, will ensure development is integrated into its landscape setting.

¹ Which I reviewed in my earlier memo dated 9 July 2025

Having said that, I am uncertain what might be developed in the 15m width of the building set-back area that is not required to be planted. This could be used for carparking outside the frontages of buildings beyond, and if such carparking was well laid out, with tree planting incorporated into the layout, this would satisfactorily integrate the development into the landscape.

However, if the building layout resulted in this area being occupied by the back yards of commercial or light industrial premises, then the accumulation of wheelie bins, storage pallets and other detritus that gathers in such locations, it could detract from the character of the landscape. Further information on how this area is to be managed is required, in my opinion.

In terms of the provisions that ensure the illustrated outcome at the Marine Business Park is achieved, I note that rather than including standards within the Precinct provisions, Mr Sanson is now proposing additions to the MUZ standards that apply to Opuā. MUZ-S3.2 identifies the 30m road set-back while MUZ-S1.2 defines the building heights for Areas A and B on Revised Figure 3, being 12m and 8m respectively.

MUZ-S12 applies only to the Opuā Marine Business Park and requires the planting of the 15m wide strip mentioned above (MUZ-S12.1) and the species to be used (MUZ-S12.2). MUZ-S12.3 states:

"Native revegetation planting using locally appropriate species is required along the western, south-western, and southern edges of the development area."

It is not clear to me where this planting is required to be, or how wide it should be. I note that the revised Figure 2b shows a large block of planting in the north-western corner of the site, along with a smaller block in the south-eastern corner. Neither of these fit the descriptor above. Additionally, revised Figure 2b shows hatching around the north-eastern boundary of the site which is annotated as '3m native planting screen'. This does not seem to fit the descriptor either. Nor is it clear whether the 3m is a required width or height of planting. Clarification of these points will be necessary, in my view.

BUILDING 5, GATEWAY APARTMENTS

At the end of both his July 7 memo and his August 18 memo, Mr Cocker responds to the concerns I raised in my May 22 memo with respect to the potential impacts of a 16m high building on the corner of Baffin and Franklin Streets. In his 7 July response Mr Cocker agreed that this site would function as a gateway to Opuā and that a considered design response in this location will be important. He went on to refer to proposed Development Guidelines and noted:

"It is proposed that development guidelines (referenced above under PRECX-S7) be developed, to ensure that the building in this location will be designed with an appropriately proportioned and modulated form that is appropriate to its location. Potential matters that are likely to be discussed within the guidelines are the need to address:

- *active public edges*
- *front doors and entrances*
- *facade design and materials*

- balconies

Guidance will include the need to address both frontages [to] ensure that the building overlooks, and has a visual relationship with, the streets / public spaces. In addition, the building should include some high-quality architectural features to reinforce the corner and the building's visual prominence. These features should be three dimensional and not limited to standard fixings or features such as windows."

As I noted in my 9 July memo, it is not clear whether Mr Cocker has seen the Development Guidelines appended to the provisions provided by Mr Sanson in his 7 July memo. Having reviewed these, myself, I noted that while they provide good objectives and criteria across a number of topics, they are not specific enough to pick up the detail of Mr Cocker's recommendations, cited above. In my view, this building is of sufficient importance at the entrance to Opuia, whether arriving by ferry or road, to warrant some more specific guidance than was included in the proposed Development Guidelines. That remains my opinion.

However, I note that neither the Precinct Plan and Development Schedule, nor the Development Guidelines provided earlier by Mr Sanson have been included with his rebuttal evidence. I am thus uncertain how development on this important corner, and indeed throughout the precinct, is to be managed.

CONCLUSIONS

Changes made to the proposed mitigation of development on the Marine Business Park site are acceptable, subject to some clarification of what planting is required where and what development may occur within the unplanted portion of the building set-back area.

The removal of the Precinct plan, Development Schedule and Design Guidelines from the proposed provisions leaves uncertainty in my mind.



Melean	Absolum
Dip LA	FNZILA
29 August	2025