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 within in the Kerikeri-Waipapa area under the proposed Far North District Plan

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STATEMENT OF EVIDENCE OF VICTOR GEORGE HENSLEY IN SUPPORT OF SECTION 42A REPORT FOR HEARING 15D

INFRASTRUCTURE

10 September 2025

SIMPSON GRIERSON

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1. INTRODUCTION

1.1 My full name is Victor George Hensley.

1.2 I am an engineering consultant. I have been in this position since June 2024.

1.3 I hold NZCS (Geology) and I have 50 years of engineering experience – 25 years in heavy construction (earthworks, structures infrastructure including specifically 11 years focused on subdivision development) and 25 years in road transport maintenance and Infrastructure Asset Management.

1.4 I have been asked to provide evidence in relation to infrastructure, to support the evaluation report prepared under s 42A of the RMA in relation to the proposed district plan of the Far North District Council (**Council**).

1.5 In my role as an infrastructure engineering consultant, I have been engaged to consider the overall infrastructure matters as part of the on-going long-term planning for the Kerikeri/Waipapa area, including the significant proposal set out in the Kiwi Fresh Orange Company Limited (**KFO**) submission and the impact on the overall development of the area.

1.6 I have read the evaluation report prepared in accordance with s 42A of the RMA. I have also read the evidence prepared on behalf of KFO in support of its submission seeking urban rezoning of land between Kerikeri and Waipapa.

1.7 I have read and am familiar with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. I have complied with the Code of Conduct in preparing my evidence and will continue to comply with it while giving oral evidence before the Hearings Panel. I confirm that my evidence is within my area of expertise except where I state that I am relying on the evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in my evidence.

2. SCOPE OF EVIDENCE

2.1 My evidence will cover the following matters:

(a) my understanding of the KFO proposal and infrastructure servicing plan as it relates to 3 waters and transport infrastructure;

(b) a summary of my understanding of the key infrastructure capacity and feasibility considerations in relation to the KFO proposal;

(c) a summary of my understanding of the key cost considerations in relation to the infrastructure upgrades which would be required to enable the KFO proposal;

(d) a summary of the Proposed District Plan – Recommendations Version (**PDP-R**) option for intensification (as described in the s 42A report) and my understanding of the key infrastructure capacity considerations which support the PDP-R; and

(e) a summary of the Council's current infrastructure planning and funding processes which will support the PDP-R.

3. SUMMARY OF EVIDENCE

3.1 By way of summary, I consider that the PDP-R option for intensification is able to be supported and enabled in the short term by both existing capacity available within the public infrastructure network, as well as identified upgrades and improvements which are currently planned and funded.

3.2 Recently, the district councils in Northland resolved to form a council-controlled organisation to own and manage water supply and wastewater assets in the region (**Northland Waters CCO**). Stormwater will continue to be delivered by the Far North District Council. A water services strategy will be prepared (including a 10-year capex programme) around 2027 and, as a result, water supply and

wastewater activities will not be included in the next 2027-37 Long Term Plan of the Far North District Council.

3.3 The PDP-R option for intensification requires investment in water treatment plant capacity in the short-term (with funding already allocated through the 2024-2027 Long Term Plan), and reservoir capacity, water and wastewater network capacity and wastewater treatment plant capacity in the medium to long-term. Medium and long-term investment relating to water supply and wastewater infrastructure will be planned and funded through the newly established Northland Waters CCO. Sufficient raw water resources are available to service growth. Council's existing stormwater infrastructure and pipe network will require investment for both upgrades and extensions over time in order to cater for anticipated future growth.

3.4 I consider there remains uncertainty as to how – and indeed if – the proposed infrastructure servicing plan proposed by KFO is able to be consented, funded and delivered. If it can be, I am of the opinion that while the site may be able to be serviced in the future to support potential urban growth, significant further work is required to demonstrate how the necessary infrastructure upgrades will be funded, by whom, and how the KFO servicing plan will support the wider plans and strategy for infrastructure servicing and funding for the benefit of the wider Kerikeri-Waipapa community.

3.5 In relation to the servicing strategy proposed by KFO, I note the following:

(a) A significant water supply extension would be required to feed into the development, either from Golf View Road or Waipapa road. Additional pipeline upgrades are also likely to be needed. Servicing this area would likely result in a dead-end line which is not desirable from a pressure/quality perspective.

(b) An extension of the Kerikeri wastewater network would also be required to service the development. Upgrades of existing wastewater pipes on Golf View Road are also likely to be needed. The development would likely require a pump station and long rising main. In the early stages of

the development, problems may be likely with the low flows coming into the pump station causing septicity in the line and downstream network. A stand-alone wastewater treatment plant development within the site (as suggested by the submitter), as a temporary option until public reticulation is funded and installed, is not preferred due to the on-going maintenance and operational requirements. It is also noted that the capital cost of such a wastewater treatment plant per property is much higher (for smaller stand-alone schemes) when compared with larger plants servicing the wider community. Any such temporary stand-alone scheme will also likely generate the need for site rehabilitation and remediation works, at the time of switching from the 'stand-alone' scheme to reliance on the wider public network infrastructure. At this stage, there is no detail provided in relation to how these rehabilitation and remediation works would be undertaken, what would be required, and who would fund such works. This could involve costs to the responsible entity (e.g. the Northland Waters CCO) and may run the risk of diverting important funding away from investment into network improvements which benefit the wider community, in favour of allocation of funds for the primary benefit of one developer / development.

(c) An extensive new road network is required with parts of the network inside flood prone areas. Two new bridges and an upgrade to the Golf View Road bridge would be necessary. A major new intersection (roundabout) on State Highway 10 is required to facilitate access.

3.6 To date, KFO has not provided binding commitments or evidence confirming responsibility for funding the full infrastructure which would likely be required to support development of the site. While it is expected that some costs could potentially be recovered through development contributions, developer agreements, or similar mechanisms – in the absence of such certainty, I consider that rezoning the KFO site for urban use presents a significant financial risk to the responsible entities.

4. KFO'S PROPOSAL AND INFRASTRUCTURE SERVICING PLAN

KFO's rezoning request

4.1 By way of summary, the KFO submission seeks to rezone 197ha of land between Kerikeri and Waipapa, which is currently zoned for Rural Production. KFO's submission seeks a live urban zoning of the land, comprising a mix of general residential, mixed urban and natural open space.

KFO's infrastructure servicing plan

4.2 KFO's proposed approach to the servicing of the land proposed to be rezoned is set out in the evidence of Mr Ehlers (Infrastructure), dated 16 June 2025. By way of an overview, KFO's proposed servicing plan can be summarised as follows.

Wastewater

4.3 KFO's proposed approach to wastewater servicing of the site can be summarised as follows:

(a) A staged approach to development of the site, where initial on-site treatment and disposal is available up to a development threshold of 840 dwellings plus 5ha of commercial development serviced by an on-site treatment plant and a 22ha disposal field, including an 11ha reserve area to enlarge the disposal field if needed. Discharge consent would need to be sought and obtained for the disposal field.

(b) The approach to wastewater disposal could be switched over time, from on-site treatment and disposal to an off-site option when the public system is ready / available. Until such time as the public system is available, KFO consider that the on-site treatment and disposal approach can be utilised up to the 840 residential development plus 5ha commercial development 'limit'.

Water Supply

4.4 KFO's proposed approach to water supply for the site can be summarised as follows:

(a) There is acknowledgement that water supply is a constraint to future growth and development in the Kerikeri-Waipapa area. There are existing constraints in the public water supply system, Puketotara Stream is fully allocated. Additional water would be sourced from dams owned by Kerikeri Irrigation Company Limited.

(b) In terms of connection point to the public network, the site could be connected to the trunk main at the proposed northern entrance on Waipapa Road.

Stormwater

4.5 KFO's proposed approach to stormwater management for the site can be summarised as follows:

(a) KFO consider that the existing floodway can be modified without significant adverse effects on other properties. Discharge of stormwater from the proposed development area would primarily be to the floodway and potentially also to Puketotara Stream.

(b) Stormwater treatment and attenuation systems would need to be provided on the development site prior to discharge, including discharges to the floodway and Puketotara Stream.

(c) KFO proposes that stormwater attenuation and treatment devices will occupy approximately 15% of the land area that will be developed. These facilities, which include swales, rain gardens and attenuation basins, are proposed to be integrated with the landscape to improve open spaces and amenity.

Transport

4.6 KFO have developed several concept options to provide access to the development site. Mr Ehlers has considered all of the access points from an engineering perspective and considers that each can be feasibly constructed. The potential transportation effects of the access points are considered in Mr Collins' evidence in support of the s 42A report.

Infrastructure capacity and feasibility of infrastructure servicing in relation to the KFO proposal

4.7 In relation to KFO's proposal, in summary Mr Ehlers considers that the 3-waters assessment prepared by Beca / Council demonstrates that the public water supply and wastewater systems can be upgraded to support residential and commercial development on the site. Timing issues for the wastewater upgrades can be overcome by providing an interim on-site wastewater treatment and land-disposal system. He considers that upgrades to the water supply system will be required regardless of the location of development in Kerikeri. Mr Ehlers notes that once the floodway is in place, stormwater management on the site will consist of the standard measures to control stormwater quality and peak discharge rates. Overall, he considers that the site can be adequately serviced from a 3-waters and transport perspective.

4.8 I note that the KFO site is disconnected from existing urban infrastructure and would require substantial upfront investment in new roads, water supply, wastewater systems, stormwater infrastructure, and community facilities. Greenfield developments are generally more expensive on a per-unit basis compared to intensification options. These elevated costs arise from the need to establish extensive new infrastructure. The KFO site's physical isolation, environmental constraints, and lack of integration with existing urban areas make

infrastructure delivery difficult to stage and significantly more costly. I consider that the key servicing challenges include:

Water supply

4.9 A significant extension of the Kerikeri water network would be required to service development of the KFO site, either from Golf View Road or Waipapa Road. Additional pipeline upgrades are likely to be needed. Servicing the site would likely result in a dead-end line, which presents challenges for maintaining water pressure and quality.

Wastewater

4.10 An extension of the Kerikeri wastewater network would also be required, along with upgrades to existing wastewater pipes along Golf View Road. The development would likely need a new pump station and a long rising main. In early stages, low wastewater flows may lead to operational issues such as septicity within the line and downstream network. A stand-alone wastewater treatment plant, as suggested by the KFO as an interim solution, is not preferred due to long-term maintenance and operational challenges. Integration between private and public systems also raises risks.

Transport network

4.11 The site would require an extensive new road network, parts of which would pass through flood-prone areas. Two new bridges and an upgrade to the existing Golf View Road bridge would be necessary. In addition, a major new intersection (likely a roundabout) on State Highway 10 would be required to enable access.

Flooding and stormwater

4.12 A significant portion of the land within the KFO site is subject to flood risk. To address this, KFO proposes flood mitigation measures including the creation of a floodway to convey State Highway 10 overflows through the site, and a stopbank along the true right bank of the Kerikeri River (downstream of SH10) to prevent overflows from entering the site. This proposal differs from the spillway scheme previously investigated by the Northland Regional Council (**NRC**).

4.13 During the development of the Te Pātukurea Spatial Plan (**Spatial Plan**), the Council received advice from NRC that no information has been provided by KFO regarding the long-term costs, ownership, operation, or maintenance of the proposed flood mitigation infrastructure. If these assets are intended to be vested in either council (NRC or the Council), the associated costs to ratepayers would generally only be justifiable if there are broader catchment-wide benefits. However, the proposed works appear to primarily benefit the submitter's site, with limited flood risk reduction for surrounding areas such as Waitotara Drive, Waipapa Road, and Rainbow Falls Road.

4.14 The Council's Infrastructure Group also has concerns about the proposal. In light of the extraordinary weather events experienced over the past two years, there is an increasing need to reassess flood resilience. Notwithstanding the proposed mitigation measures, directing urban development into a flood-prone area such as the KFO site carries long-term risks. There are also unresolved questions regarding the responsibility for the ongoing management and funding of flood mitigation infrastructure, including installation and lifetime maintenance.

4.15 In my professional opinion, enabling urban development in flood-prone areas, such as the KFO land, poses significant long-term risks and is inconsistent with good planning practice.

4.16 Flood-prone areas are subject to recurring hazards that can threaten life, property, infrastructure, and community wellbeing. Development in these areas often requires extensive mitigation measures, which carry high capital and operational costs, and may not fully eliminate residual risk. These risks are compounded by climate change, which is expected to increase the frequency and severity of extreme weather events.

4.17 Directing growth into flood-prone areas undermines the objectives of resilience, infrastructure efficiency, and sustainable development. It also risks placing future communities in harm's way and may result in long-term financial liabilities for councils and ratepayers. In my view, urban development should be directed to

areas that are safe, serviceable, and well-integrated with existing infrastructure networks.

Cost of public infrastructure to enable the KFO proposal

4.18 Through the assessment of the KFO site as part of the development of the Spatial Plan (referred to as 'Scenario F'), initial high-level costings were considered in relation to the likely infrastructure servicing needs for development of the site.

4.19 The indicative cost estimate for 'Scenario F' (e.g. urban development of the KFO land) indicated a potential range of $134M to $234M (which excludes unquantified stormwater servicing costs) – however this estimate did not include costs for the following additional key infrastructure which are considered necessary to support the development of the submitter's land:

(a) two new and one updated transport bridges spanning Kerikeri River and Puketōtara Stream;

(b) flood mitigation infrastructure;

(c) new access on to SH10; and

(d) private wastewater plant and associated infrastructure (for potential public vesting to the responsible entity in the future, or removal and rehabilitation).

4.20 These additional works would represent additional costs which would be assumed to be borne by the developer and, at this stage, there is no certainty that the submitter is committed to paying for the infrastructure required to service the future development of the land.

4.21 To date, the developer has not provided binding commitments or evidence confirming responsibility for funding the full infrastructure which would likely be required to support development of the site. While it is expected that some costs

could potentially be recovered through development contributions, developer agreements, or similar mechanisms, these are complex issues which would take some time to work through. In the absence of certainty about these matters, rezoning the KFO site for urban use presents a significant financial risk to the entities responsible (e.g. the Council or the Northland Waters CCO). In particular, rezoning the KFO site may create expectations and pressure upon the responsible entities to spend funds in a way which has not been properly considered, and which is not in the best interests of the district.

4.22 Given the KFO land is a greenfield site, network infrastructure will need to be provided up-front of development and will be difficult to stage. More specifically:

(a) A significant water supply extension would be required to feed into the development, either from Golf View Road or Waipapa road. Additional pipeline upgrades are also likely to be needed. Servicing this area would likely result in a dead-end line which is not desirable from a pressure/quality perspective.

(b) An extension of the Kerikeri wastewater network would also be required to service the development. Upgrades of existing wastewater pipes on Golf View Road are also likely to be needed. The development would likely require a pump station and long rising main. In the early stages of the development, problems may be likely with the low flows coming into the pump station causing septicity in the line and downstream network. A stand-alone wastewater treatment plant development within the site (as suggested by the submitter), as a temporary option until public reticulation is funded and installed, is not preferred due to the on-going maintenance and operational requirements. It is also noted that the capital cost of such a wastewater treatment plant per property is much higher (for smaller stand-alone schemes) when compared with larger plants servicing the wider community. Any such temporary stand-alone scheme will also likely generate the need for site rehabilitation and remediation works, at the time of switching from the 'stand-alone' scheme to reliance on the wider public network infrastructure. At this

stage, there is no detail provided in relation to how these rehabilitation and remediation works would be undertaken, what would be required, and who would fund such works. This could involve costs to the responsible entity, which may run the risk of diverting important funding away from investment into network improvements which benefit the wider community, in favour of allocation of funds for the primary benefit of one developer / development.

(c) An extensive new road network is required with parts of the network inside flood prone areas. Two new bridges and an upgrade to the Golf View Road bridge would be necessary. A major new intersection (roundabout) on State Highway 10 is required to facilitate access.

4.23 These infrastructure requirements would represent additional infrastructure costs, on top of those which have already been assessed and considered in relation to the PDP-R option – being the consolidation of urban growth and enablement in proximity to the existing Kerikeri and Waipapa centres.

5. PROPOSED DISTRICT PLAN – RECOMMENDATIONS VERSION

Intensification and rezoning

5.1 The PDP-R includes a package of zoning recommendations for Kerikeri-Waipapa to provide for urban growth and intensification. The package is outlined in the s 42A report. The PDP-R promotes a compact, sustainable urban form, concentrating most housing and business growth in the urban centres of Kerikeri and Waipapa. This approach, particularly the intensification component, is considered to partially implement the 'hybrid' growth scenario ('Scenarios D and E') which was selected as the preferred urban growth option through the recently adopted Spatial Plan.

5.2 In my view, consolidating development in existing urban areas – primarily through the proposed application of the new Medium Density Residential Zone within walkable catchments of the Kerikeri and Waipapa centres and application of a Town Centre Zone – makes the most efficient use of existing infrastructure, and

current planned budgets for roading and three-waters systems. But upgrades to existing systems and new infrastructure will also be required.

Infrastructure capacity for the PDP-R option

5.3 The existing Kerikeri-Waipapa water, wastewater and stormwater schemes only service a proportion of the population, with many households self-reliant without a connection to the reticulated networks.

Water supply and treatment

5.4 With a rated treatment capacity of 3,500 m^3/d, the Kerikeri water treatment plant (**WTP**) currently services Kerikeri, Skudders Beach, Riverview and Waipapa. It has two raw water sources of supply – the Lake Waingaro reservoir, owned and operated by the Kerikeri Irrigation Company responsible for up to 70% of WTP intake, and the Puketotara stream, contributing the remainder.

5.5 Originally built in 1971, the WTP combines coagulation, clarification, filtration, UV and chlorine disinfection to achieve 4 log credits of treatment. Treated water is stored within three reservoirs, two onsite sized 500 m^3 and 1,000 m^3, and a third located in Waipapa with 1,790 m^3 in storage capacity.

5.6 The existing WTP is operating at close to its 3,500 m^3/d capacity at peak demand, with demand expected to match capacity within 3-5 years. Funding for upgrading the Kerikeri WTP was allocated in the Long Term Plan for a total of $7.7M through to 2026/27. The LTP also includes approximately $1.95M for district-wide water storage improvement through to 2026/2027.

5.7 In terms of water sources, the Puketotara Stream does not have high drought resilience, and although this source provides some diversity, there is no room for expansion and, in the worst-case drought, there will be no water available from this source. Drought resilient sources will need to include storage to enable supply during drought events. Future water resources are expected to be sourced primarily from the Kerikeri Irrigation Waingaro Dam and the Te Tai Tokerau Otawere Dam. There are sufficient water resources available to meet the

medium-term demands from these sources, and long-term with the purchase of additional water allocation.

5.8 Further increases in capacity for both the existing water treatment and storage will likely be required in the future, in order to address medium- and long-term growth (5-15 years). Funding will be considered as part of the development of the water services strategy by the Northland Waters CCO.

5.9 The Implementation Plan for the Spatial Plan also identifies future extensions and upgrades to the Kerikeri water supply network and reservoirs in the medium-term (4-10yrs) in order to provide for additional storage and network extensions to meet anticipated demand over time.

Wastewater

5.10 Recently constructed in 2020, the Kerikeri wastewater treatment plant (**WWTP**) currently services around 1,500 households within urban Kerikeri. The treated wastewater releases treated discharge to a nearby tributary within the Waitangi Wetlands.

5.11 The plant uses biological activated sludge treatment within two parallel Sequencing Batch Reactors (**SBRs**) to remove wastewater contaminants, followed by tertiary filtration and UV disinfection before discharging treated wastewater into the Waitangi Wetlands.

5.12 Future upgrades to the WWTP will be required to provide additional capacity to support urban growth in accordance with the PDP-R, likely to involve the installation of two additional SBRs to cater for anticipated medium to long-term growth.

5.13 The current resource consent for the WWTP allows for a maximum dry weather flow discharge to the wetlands of 1,350 m^3/d as a rolling average. This is expected to allow for growth (under the PDP-R) until the existing consent expires in 2036. It is anticipated that the addition of two SBRs at the WWTP would provide the required capacity under the preferred growth option through to the early-mid

2040s subject to the consent renewal being obtained with a higher flow allowance. Funding for this and any further upgrades will be considered as part of the development of the water services strategy by the Northland Waters CCO.

5.14 The Implementation Plan for the Spatial Plan also identifies future extensions and upgrades to the Kerikeri wastewater network in the medium to long-term in order to enable future connections to new growth areas over time.

Stormwater

5.15 Urban stormwater collection is currently provided to those areas also serviced with treated water, including Waipapa, Skudders Beach, Riverview and Kerikeri. The majority of the private subdivisions have an onsite collection and attenuation system (such as a pond or water tank) prior to stormwater entering the reticulation network. Following collection, the untreated stormwater is discharged from the network into streams, rivers or the sea. Future stormwater adaption will need to account for not only population growth, but the increasing severity of storms as a result of climate change.

5.16 New stormwater infrastructure will need to meet the level of service required by the Far North District Council Engineering Standards and discharges from growth areas or individual sites will include requirements for both quantity and quality controls.

Three Waters Capacity Summary

5.17 The PDP-R option for intensification requires investment in water treatment plant capacity in the short-term (with funding already allocated through the 2024-2027 Long Term Plan), and reservoir capacity, water and wastewater network capacity and wastewater treatment plant capacity in the medium to long-term. Medium and long-term investment relating to water supply and wastewater infrastructure will be planned and funded through the newly established Northland Waters CCO. Sufficient raw water resources are available to service growth. Council's existing stormwater infrastructure and pipe network will require investment for both upgrades and extensions over time in order to cater for anticipated future growth. It is generally assumed that developers would provide stormwater attenuation to

service new growth areas. Council's role would be to address known flooding issues within the existing urban area.

Cost of public infrastructure for the PDP-R option

5.18 Through the development of the Spatial Plan, the indicative cost estimate for the Council's preferred growth option (being the Spatial Plan's 'hybrid' Scenario D and E) indicated a potential range of $145M to $248M (which excludes unquantified stormwater servicing costs). The high-level indicative cost range for just for water and wastewater infrastructure is $68M to $145M. Specific details in relation to the indicative costs regarding water supply and wastewater are set out in the 3 Waters technical assessment which was prepared (by Beca Limited) as part of the development of the Spatial Plan[1]. These costs were primarily developed to allow comparison of scenarios.

5.19 Importantly, these costs for the Spatial Plan's 'hybrid' Scenario D and E include the servicing of urban expansion to the north of Waipapa and the south of Kerikeri, which does not form part of the PDP-R at this stage. The PDP-R includes only the intensification component of the Spatial Plan's hybrid scenario, which is able to be supported and enabled in the short term by both existing capacity available within the public infrastructure network, as well as identified upgrades and improvements which are currently planned and funded through the 2024-2027 Long Term Plan.

5.20 Further detailed modelling and design work is required to develop more detailed infrastructure costs and timing for full implementation of the Spatial Plan's 'hybrid' Scenario D and E.

6. PDP-R OPTION COMBINED WITH KFO PROPOSAL

6.1 In relation to consideration of the option of proceeding with the PDP-R as well as enablement of the KFO land for urban growth, it is important to note that the cost estimate for the KFO land would be additional to the identified upgrades and

1 https://www.fndc.govt.nz/__data/assets/pdf_file/0024/38643/3394841bcd07707031cd431dd4a12487f7bc039b.pdf

improvements which are currently planned and funded in the short term via the Long Term Plan.

6.2 If the 'hybrid' Scenario D and E were to be fully implemented in addition to the KFO proposal, the overall cost of growth from an infrastructure servicing perspective would be very large in the context of the Far North District. The combined costings would amount to $279M to $482M, even with some significant costs excluded as set out above.

6.3 While greenfield land may appear to offer lower upfront per-hectare costs, a meaningful comparison with brownfield development must account for the substantial costs associated with servicing greenfield areas, including new infrastructure for transport, water supply, wastewater, and stormwater, as well as long-term servicing and maintenance requirements.

6.4 By contrast, intensification within and around the existing urban footprint, as proposed by the PDP-R (and supported by the Spatial Plan), can deliver system-wide cost savings. Intensification enables the efficient use of existing infrastructure and supports higher-density typologies that respond to land values and market demand. These approaches are more likely to achieve a compact urban form and contribute to long-term affordability by spreading infrastructure costs more effectively and increasing housing supply across a range of locations and types.

6.5 The substitution of public infrastructure systems with private systems (and their integration), such as wastewater treatment and disposal, has been raised by the submitter as a potential solution to address any capacity constraints. While there may be some benefits from sharing costs or developing short-term solutions to infrastructure provision, I consider that care should be taken to avoid ad hoc servicing arrangements. These can be characterised by high uncertainty in relation to ongoing ownership, operating costs, responsibility for maintenance and upgrades.

6.6 Council bears an obligation to plan responsibly for future growth and to mitigate risks relating to infrastructure provision. Given the current degree of uncertainty

as to how or when the infrastructure capacity upgrades (which have been identified as likely required to enable and provide for the development of the KFO land) can be funded and developed, I do not consider that it would be appropriate – from an infrastructure servicing and cost perspective – to proceed with the enablement of the KFO land for urban growth and development at this time.

7. INFRASTRUCTURE PLANNING AND FUNDING BY THE COUNCIL

7.1 Sustainable infrastructure funding is a critical long-term issue. Council is currently considering its approach to development funding including the potential adoption of a development contributions / levies policy and financial contributions under the Resource Management Act 1991. As noted above, medium and long-term investment relating to water supply and wastewater infrastructure will be planned and funded through the Northland Waters CCO.

Planned and funded infrastructure projects

Long Term Plan 2024-2027

7.2 The Long Term Plan is the Council's key strategic planning document, which sets out what the Council plans to do and how it intends to pay for it. The Council currently has an adopted three-year Long Term Plan for 2024-2027. The Long Term Plan usually looks 10 years ahead, but the back-to-back weather events of 2022 and 2023 have had a significant impact on repair costs for our district. Because of this, the government allowed the Far North District Council (and seven other councils in Aotearoa) to reduce their Long Term Plan forecasts to just three years.

7.3 In relation to currently planned and funded infrastructure projects, the 2024-2027 Long Term Plan currently includes the following in relation to the Kerikeri and Waipapa areas:

(a) Wastewater

(i) consent variation for Kerikeri WWTP (circa $260,000). It is noted this has now been completed; and

(ii) network pump station capacity improvements for Kerikeri ($600,000).

(b) Water

(i) Kerikeri fluoridation ($1.2M);
(ii) water treatment plant upgrade for Kerikeri (circa $7.7m); and
(iii) upgrade main to Heritage bypass, Kerikeri (circa $12.1M).

(c) Stormwater:

(i) stormwater network extension upgrades for Kerikeri ($131,000).

7.4 Recently, the district councils in Northland resolved to form the Northland Waters CCO to own and manage water supply and wastewater assets in the region. A water services strategy will be prepared (including a 10-year capex programme) around 2027 and, as a result, the water supply and wastewater activities will not be included in the next 2027-37 Long Term Plan.

Te Pātukurea Spatial Plan: Implementation Plan

7.5 The Spatial Plan includes an Implementation Plan that outlines the high-level actions the Council will need to undertake to deliver the planned growth. While the Spatial Plan sets a 30-year strategic direction, the Implementation Plan identifies actions required across the short, medium, and long term to support its delivery.

7.6 The Implementation Plan includes new and upgraded strategic infrastructure to support growth over the next 30 years. This includes new road connections and intersections, upgrades to the Kerikeri WTP and WWTP, and servicing Waipapa with reticulated wastewater infrastructure. The Implementation Plan also outlines actions to explore funding and financing mechanisms to fund infrastructure.

7.7 At present the reticulated wastewater system in Waipapa is indicated for implementation in the medium term (4-10 years) in the Implementation Plan.

8. CONCLUSION

8.1 By way of summary, I consider that the PDP-R option for intensification is able to be supported and enabled by both existing capacity available within the public infrastructure network, as well as identified upgrades and improvements which are currently planned and funded in the short term.

8.2 The PDP-R option for intensification requires investment in water treatment plant capacity in the short-term (with funding already allocated through the 2024-2027 Long Term Plan), and reservoir capacity, water and wastewater network capacity and wastewater treatment plant capacity in the medium to long-term. Medium and long-term investment relating to water supply and wastewater infrastructure will be planned and funded through the newly established Northland Waters CCO. Sufficient raw water resources are available to service growth. Council's existing stormwater infrastructure and pipe network will require investment for both upgrades and extensions over time in order to cater for anticipated future growth.

8.3 I consider there remains uncertainty as to how – and indeed if – the proposed infrastructure servicing plan proposed by KFO is able to be consented, funded and delivered. If it can be, I am of the opinion that while the site may be able to be serviced in the future to support potential urban growth, significant further work is required to demonstrate how the necessary infrastructure upgrades will be funded, by whom, and how the KFO servicing plan will support the wider plans and strategy for infrastructure servicing and funding for the benefit of the wider Kerikeri-Waipapa community.

Victor George Hensley

10 September 2025