

BEFORE THE INDEPENDENT HEARINGS PANEL

UNDER the Resource Management Act 1991 (RMA)
IN THE MATTER of the Far North Proposed District Plan - Hearing 15D:
Rezoning Kerikeri-Waipapa

**STATEMENT OF REBUTTAL EVIDENCE OF STEPHEN LAWRENCE
BROWNLIE ON BEHALF OF KIWI FRESH ORANGE COMPANY LIMITED**

CORPORATE

24 September 2025

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WYNN WILLIAMS

INTRODUCTION

- 1 My full name is Stephen Lawrence Brownlie.
- 2 I am the Director of Kiwi Fresh Orange Company Limited (**KFO**).
- 3 In preparing my rebuttal evidence, I have read and refer to the s 42A evidence of Mr Kenneth Macdonald for the Council.

COMMITMENT TO FUNDING INFRASTRUCTURE

- 4 KFO has not adopted a “sort it all out later” approach.¹ As I confirmed in my evidence in chief, we remain committed to paying our own way for the infrastructure required to service the development.²
- 5 KFO appreciates the constraints on the Council’s and the newly confirmed Northland Waters CCO’s financial situation and existing infrastructure. We also appreciate the need to keep rates affordable for existing households.
- 6 KFO has made repeated undertakings to pay its own way for infrastructure that it creates demand for, and which KFO is the beneficiary of. My understanding is that the provision prepared by Ms O’Connor requires KFO to demonstrate how servicing will be achieved for any development application.
- 7 KFO accepts the proposition that growth communities should bear a proportionate share of capital costs for infrastructure needed due to their development, protecting existing ratepayers from unsustainable increases and supporting fair, sustainable growth.
- 8 We have always been willing to engage with the Council on how infrastructure for the development will be funded. In fact, one of the unique advantages of having one landowner / developer is the option to enter into development agreements to fund infrastructure.
- 9 We remain committed to meeting the infrastructure costs of the rezoning proposal.

¹ Macdonald SOE at [3.3].

² Brownlie SOE at [16].

CONCLUSION

- 10 KFO is committed to paying its own way for infrastructure it generates demand for, and which it benefits from. We remain eager to work with the Council to reach an agreeable solution to infrastructure funding.
- 11 Given KFO's repeated commitments, and our efforts to engage with the Council through our lawyers using the op-in process, I was surprised to read Mr McDonald's strong assertion that the "KFO approach seems to be to seek rezoning ... and then 'sort it all out later'". This does not reflect KFO's approach. In my view, Mr McDonald's statement is indicative of the Council's broader ideological opposition to greenfields development in Kerikeri and Waipapa, despite all the work that KFO has put in to deliver a good outcome for Kerikeri and Waipapa.
- 12 As Dennis Corbett's evidence explains, KFO has put a lot of time and effort into engaging with stakeholders to understand their views on the proposal. This commitment to engagement demonstrates KFO's intention to address stakeholder interests and provide housing that people in Kerikeri and Waipapa actually want.

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Stephen Brownlie

24 September 2025