

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

**MEMORANDUM OF COUNSEL FOR KIWI FRESH ORANGE COMPANY
LIMITED**

19 November 2025

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WYNN WILLIAMS

MAY IT PLEASE THE PANEL

- 1 Expert caucusing is a recognised method of narrowing issues to allow decision-makers to focus on the issues in dispute. Decision-makers frequently rely on expert caucusing to understand expert evidence about the potential effects of a submission, the risks of acting and not acting, and the efficiency and effectiveness of the options and provisions before them.
- 2 The parties have already exchanged evidence, and the Panel has already held Hearing 15D. However, following an adjournment, the reporting officers intend to table their final right of reply on 12 December 2025. With Hearing 15D still afoot, KFO and the reporting officers could assist the Panel by expert conferencing and tabling the results of this conferencing with the reporting officers' final right of reply.
- 3 This memorandum seeks a direction from the Panel encouraging expert caucusing on two expert topics that KFO considers may materially affect the Panel's recommendation on its submission on the PDP – planning and flood management. We set out the directions sought and then provide reasons.

Directions sought

- 4 That the Panel direct:
 - (a) Ms O'Connor and Mr Wyeth to participate in expert conferencing to discuss the most recent version of the Precinct Provisions put forward by Ms O'Connor. Topics of discussion may include but are not limited to:
 - (i) The efficiency and effectiveness of the provisions in achieving the objectives, including the assessment under s 32(2);
 - (ii) The drafting of the Precinct provisions (including any provisions that would be acceptable to Mr Wyeth, subject to his overall recommendation regarding KFO's submission);
 - (iii) The Minute 14 rezoning criteria.
 - (b) Mr Kuta and Dr Rix to participate in expert conferencing regarding the floodway concept.

- (c) The experts to produce joint witness statements recording:
 - (i) any points of agreement or disagreement reached, along with reasons for the agreement or disagreement;
 - (ii) any other relevant matter referred to in clause 9.5 of the Code of Conduct for Expert Witnesses.
- (d) That any conferencing is to occur in accordance with the Code of Conduct for Expert Witnesses and the Environment Court Practice Note 2023 insofar as it is applicable.

Reasons

Opt-in process and prior attempts by KFO to engage with reporting officers

- 5 Prior to the hearing, KFO attempted to engage with reporting officers as envisaged by the opt-in process. While this was unsuccessful, as explained below, the current adjournment to allow the reporting officers' written reply provides further time and a fresh opportunity for engagement.
- 6 By way of background, Minute 14 strongly encouraged submitters with substantial or complex rezoning requests, like KFO, to engage with the opt-in process as a means of having a more collaborative and overall efficient approach to having their requests considered. Minute 14 also encouraged reporting officers to engage in pre-hearing discussions with submitters who opted in.
- 7 By opting in good faith, KFO hoped that direct engagement with reporting officers would narrow or resolve issues. The value proposition was that, while less time would be available to KFO to reply to the Council's evidence in rebuttal, the gains from expert caucusing would outweigh losses in time.
- 8 KFO made multiple attempts by correspondence to engage with council staff to narrow issues or achieve expert conferencing in the hopes of identifying and refining issues. These attempts were unfortunately rebuffed and ultimately of limited utility.

- 9 Examples of KFO's extensive efforts to identify and resolve evidential and conceptual issues included:
- (a) Letter to FNDC dated 7 March 2025 following a meeting with Council. KFO expressed its desire to narrow and identify issues for the benefit of the Panel, and to set down a timetable for engagement between experts and conferencing. KFO also confirmed that it has opted in to the 'reverse timetable' process.
 - (b) Letter to FNDC dated 29 April 2025 with a suggested approach to conferencing, timing and expert topics. KFO offered to prepare a draft conferencing agenda that reflected points of disagreement that had been identified.
 - (c) By email dated 9 May 2025, Mr James Witham for FNDC responded that expert conferencing would be most efficient and productive if it occurred after submitter evidence had been lodged but prior to the s 42A report.
 - (d) By email dated 15 May 2025, Mr Witham reserved his position on the value of expert conferencing until after written evidence has been received.
 - (e) KFO received no further response after the filing of its evidence.
- 10 A record of this correspondence is provided in **Appendix A**.
- 11 Since Hearing 15D, Ms O'Connor made further attempts to engage with Mr Wyeth regarding precinct provisions, which were declined. A record of this correspondence is provided in **Appendix B**.
- 12 Until the reporting officers give their written reply and the Panel closes Hearing 15D, the hearing is still afoot. There is still time for the Panel's envisaged engagement to occur. There is nothing in Minute 14 or the wider rules about the conduct of this hearing that prohibits the directions sought.

Efficient decision-making

- 13 An issue between KFO and FNDC is the appropriateness of the precinct provisions.
- 14 The Environment Court Practice Note underscores the value of resolving or narrowing issues, including the drafting of provisions, through expert

conferencing, so that decision-makers can focus on the substantive planning merits rather than technical drafting disputes.

- 15 KFO is also mindful not to place the Panel in the position of having to draft provisions itself or to issue an interim recommendation while seeking further input regarding the provisions. Such an approach would be inefficient and could delay the Panel's recommendation to counsellors.
- 16 Therefore, it would be appropriate for the planning witnesses to try to produce a set of Precinct provisions subject to their overall opinion on the submission's merits.
- 17 KFO also requests a direction for the flood expert witnesses to conference given the importance of that technical discipline and the apparent closeness between the evidence of Dr Rix and Mr Kuta. There would be great benefit to the Panel if the flooding issues were narrowed or resolved.

Consistency with the Code of Conduct

- 18 All expert confirmed their agreement to comply with the Code of Conduct for Expert Witnesses. This is significant for two reasons. First, the Code imposes an overriding duty on expert witnesses to impartially assist the Court (or in this context, the Panel) on matters within their expertise. This obligation supports KFO's expectation that witnesses would assist the Panel by attempting to produce an indicative set of provisions, even if the provisions are subject to their overall opinion on the merits. This is common practice for reporting officers under the RMA.
- 19 Secondly, the Code of Conduct contains a duty to confer.

Consistency with Minute 38

- 20 In Minute 38, the Panel directed conferencing between Council staff and Tapuaetahi Incorporation's planning expert to refine provisions.¹ The directions sought here are consistent with the direction issued in Minute 38.

¹ The parties had agreed to the next steps and timeframes.

Conclusion

21 KFO respectfully request directions from the Panel as set out in paragraph 4.

DATED 19 November 2025



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Mike Doesburg

Counsel for Kiwi Fresh Orange Company Limited

APPENDIX A: CORRESPONDENCE ON EVIDENTIAL AND CONCEPTUAL ISSUES

7 March 2025

Attention: Tammy Wooster, James Witham, and Sarah Trinder

Far North District Council
Memorial Avenue
Kaikohe 0440

By email to: tammy.wooster@fndc.govt.nz, james.witham@fndc.govt.nz,
sarah.trinder@fndc.govt.nz

Dear Tammy, James and Sarah

KIWI FRESH ORANGE COMPANY LIMITED SUBMISSION ON THE PFNDP

1. Thank you for meeting with us on 24 February 2025 and circulating your draft notes and transcript. We write further to that meeting with several purposes in mind:
 - (a) To provide our response to the further information that the Council requested from KFO.
 - (b) To identify issues that may arise in relation to the submission and ask for the Council's position on them.
 - (c) To set the platform for issues-based engagement between KFO, the Council, and their respective experts to ensure an efficient and robust evidence exchange for KFO and Council.

Focussing on the issues

2. As the Council has previously acknowledged, KFO's submission is supported by extensive technical reporting and analysis, demonstrating thorough research and preparation. It is keen to assist the Hearings Panel in assessing its proposal on the merits.
3. Issues-focussed engagement will benefit all parties: the Hearings Panel, the Council, KFO and other submitters. By identifying and narrowing the points of contention, the process becomes more efficient and focused, saving time and resources for everyone. Hearings Panels and the Environment Court regularly emphasise the importance of providing focused evidence – no-one is assisted by having to consider evidence on issues that are not truly in contention between parties.
4. In our meeting, we expressed KFO's desire to concentrate on the points of disagreement and where the Council considers updated or further analysis is required (while also addressing the Hearings Panel's general criteria in Minute 14 and responding to further submitters). We were pleased to have the open discussion that we did and to hear that the Council supports the intent of narrowing and identifying issues for the benefit of the Panel.¹

Response to the Council's requests for further information

5. The Council has asked KFO to provide further, or updated information on various topics. We enclose at **Appendix A** KFO's response to the request for further information.

¹ As reflected in the meeting notes.

6. Some of the requests require further work from KFO's experts. Our response on those points will follow in due course. We will provide an update of our timeframe for responding once we have that clarity.

Clarification on other issues

7. We are mindful that the Council's request for further information was based on its initial appraisal of KFO's submission and may not have captured all points. In an effort to lay the platform for issue-based engagement, we have prepared a series of statements to narrow the issues that could arise between the parties. This list is enclosed in **Appendix B**.
8. We would appreciate the Council confirming whether it agrees or disagrees with the statements and gives a reason why, even if briefly. These statements do not bind the Council to any conclusions or recommendations but will assist in guiding a focussed approach from KFO. They are intended to help understand where issues may lie, so that expert attention can be directed to that.
9. KFO is open to further in-person or online engagement with the Council on the list of preliminary points, or to set up meetings between the parties' respective experts to discuss them.

The urban environment issue and irregularities in timetabling

10. KFO's submission that Kerikeri-Waipapa is an urban environment was assigned to the strategic direction topic in Hearing 1. This issue is fundamental as it dictates how the proposed plan must align with the National Policy Statement for Urban Development 2020 (**NPS-UD**).
11. During Hearing 1, the Panel decided that it wanted more information from the Council before issuing interim guidance on KFO's submission. In Minute 7 it directed the Council to provide further information and respond to the evidence KFO filed.
12. After two interim responses from the Council, memoranda filed by KFO in response, and amendments to the hearing schedule, the Council was allowed to defer its response to Minute 7 to Hearing 14.
13. KFO is scheduled to provide evidence as part of Hearing 15D before the Council files its s 42A report for Hearing 14 (and its response to Minute 7):
 - (a) Section 42A report for Hearing 14: due 23 June 2025.
 - (b) Submitter evidence due for Hearing 15D: due 16 June 2025.
14. KFO believes this is a timetabling error and intends to request an amendment to the timetables to defer evidence on Hearing 15D to after 30 June (potentially even 7 July 2025). The purpose of deferring submitter evidence is to provide time for that evidence to consider and respond to the consequences of the Council's position on whether Kerikeri-Waipapa is an urban environment. We would be grateful if you could please advise the Council's position on this request?
15. From our meeting, we understand the Council does not wish to argue about whether Kerikeri-Waipapa is an urban environment. An alternative to changing the timetable could be for the Council to confirm in writing that it accepts for the purpose of the Proposed Plan that Kerikeri-Waipapa is an urban environment under the NPS-UD. We understand that the Council's basis for this is that the Council is intending to indicate significant planned growth through Te Pātukurea (Kerikeri / Waipapa Spatial Plan) meaning the area is planned to be predominantly urban in character and to have a planned housing and labour market of at least 10,000 people. Please let us know if the Council is willing to do so.

The 'opt-in' hearing process and a suggestion for expert conferencing

16. On 2 December 2024, the Panel issued Final Minute 14 that settled a process for evidence exchange for Hearings 15A to 15D whereby submitters could 'opt in' to a 'reverse timetable' that required the submitter to file evidence before the Council filed its s 42A report.

17. It is not clear what process will be followed if a submitter does not 'opt in'. However, KFO is opting into this process on the basis of Council's commitment to issues-focussed engagement with KFO. Please treat this letter as notice of KFO's intention to opt in (if that was not clear already).

Timeline for responses in this letter

18. We are conscious that the time we have until hearing will pass quickly. Both parties' experts are busy and we need to provide them time to come up to speed, engage with each other, and prepare evidence. With that in mind, we suggest the following timetable:
- (a) KFO to engage experts to provide further information as described in **Appendix A – due on or around the end of March.**
 - (b) Council to confirm engagement of technical experts – **due on or around the end of March.** (We understand that experts are engaged in most fields, with Tonkin & Taylor still to be engaged regarding hazard issues.)
 - (c) Council to provide a response to **Appendix B – due by or before 11 April.**
 - (d) Parties' experts to engage or conference in relation to the points of disagreement **between April and end of May.** KFO and the Council to facilitate this as appropriate.
19. Please advise your position on this timeline.

Yours faithfully
Wynn Williams



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APPENDIX A – LIST OF FURTHER INFORMATION REQUESTED

Council's request	KFO's response
Clarify the development yield and update any reports accordingly.	The potential development yield depends on the typology of the houses built. Based on the typology of housing presented by the Council for its structure plan, KFO estimates that a mix of medium density, low density, and large lot residential could theoretically yield between 2,500 and 3,000 dwellings. This is a conservative estimate to enable sound planning. For the purpose of its submission on the proposed district plan, Adam Thompson of Urban Economics considers that the medium yield scenario is most likely – see section 2 of the Economic Assessment at Appendix 4(h). The medium scenario yields approximately 1,830 dwellings. In terms of the technical reports: • The Infrastructure Servicing Report prepared by Johan Elders of INFIR assesses the level of demand for services at various developments up to 2,100 households. • The Integrated Transport Assessment prepared by Philip Brown of TEAM assumes that traffic will be generated in accordance with Urban Economics' medium to high development yield scenarios. KFO does not consider that its technical reports need to be updated at this stage. It proposes that assessment is based on Mr Thompson's medium yield scenario, but that services are assessed as up to 2,100 households. Despite the conservative technical reports, the feasibility of infrastructure servicing can be reassessed during the consent phase should the development yield exceed the medium yield scenario.
Consider whether there are gaps in the infrastructure report and: • Assess the specific requirements for wastewater and drinking water based on the projected yield. • Identify wastewater and drinking water solutions and how they could be delivered. • Consider the cost and feasibility. • Consider decommissioning and integration to avoid legacy issues.	KFO will engage Johan Ehlers of Infir to review the infrastructure report and consider this request.

In relation to flood risk: • Review flood modelling before the Council makes the report available to T+T for peer review. • Consider whether there is risk of overtopping and if so where flood water would spill. • Consider whether there is residual risk of flooding after all mitigation measures have been implemented. • Consider whether the model accounts for extreme events.	KFO will engage Laddie Kuta (formerly of e2) to review the Flood Scheme Investigation report and consider this request.
In relation to transport, confirm whether all transport infrastructure could be provided for by KFO, and if not, any consultation and agreements with parties whose land could be used for infrastructure.	The Integrated Transport Assessment filed with KFO's submission identifies several transport layouts. Some of these could be entirely provided for on KFO's land. One of the options would involve transport infrastructure being placed on Kerikeri Golf Club's land. KFO has engaged with the golf club and obtained an agreement in principle for an exchange of land between KFO and the club. It is unnecessary to take this agreement in principle further because: • Any formal agreements should follow rezoning; and • KFO has identified other options for access that do not require Golf Club land. KFO will continue to engage with the Golf Club and NZTA regarding transport routes, but considers that there is sufficient certainty at this stage. It should be noted that the State Highway 10 round about land requirement was considered and assessed, in conjunction with communications with NZTA. The outcome of the engagement and assessment is contained in the Integrated Transport Assessment Appendix 4 (m) of the Submission – refer Section 6.6. of the ITA.
In relation to ecology, to consider the risk of the presence of bats and mudfish.	KFO filed an Ecological Constraints Memorandum with its submission – see Appendix 4(f). The Memorandum was prepared by Treffery Barnett, a Marine and Freshwater Biologist from Bioresearches. The Memorandum concludes that there are few ecological constraints with the proposed rezoning.
Identify Council contacts to discuss developer agreements on funding of infrastructure impacts beyond the subject site.	KFO is happy to engage with the Council regarding infrastructure funding. However, insofar as infrastructure funding bears upon this plan change, KFO considers that the specifics of a funding mechanism can be best dealt with during the resource consenting process.

	As we understand it, the Council has neither a financial contribution nor development contribution regime. It must therefore fund infrastructure through general rates, developer agreements, or through the Infrastructure Funding and Financing Act. A recent Government announcement signals the potential for “development levies” in the future. As above, these funding mechanisms are either not relevant to the proposed plan (rating) or can be dealt with as between a landowner and Council during consenting (development agreements).
Clarify the mechanisms and typologies to be used for creating affordable housing within the development.	Greenfields development at this scale will not require specific mechanisms or typologies to create affordable housing. The economies of scale, and the single ownership, mean that infrastructure will be cheaper than piecemeal development across several sites. We would invite the Council to consider this question of its current proposal to meet demand through infill. How would it propose to create affordable housing without the economies of scale available to KFO’s proposal? KFO considers that its proposal will create more affordable housing than the Council’s plan to meet housing demand.

APPENDIX B – ISSUES ANALYSIS

Issues	Council response (agree / disagree – with reasons)
Economics	
Kerikeri-Waipapa is an urban environment under the National Policy Statement for Urban Development 2020.	
The Council intends to meet housing demand from projected population growth in the short and medium term through infill development.	
The Council has not provided for sufficient development capacity in Kerikeri-Waipapa to meet expected demand for housing in the short term, medium term, and long term, because:	
1. Its projections underestimate projected growth; and	
2. Its projections overestimate the additional housing capacity that is likely to be created through infill development.	
The Council does not have a financial contributions policy or a development contributions policy. The Council relies on development agreements or rates to fund infrastructure.	
Highly productive land	
The proposed rezoning is not an urban rezoning of highly productive land under the National Policy Statement for Highly Productive Land (NPS-HPL).	
If it is, it is not contrary to the NPS-HPL because, under section 3.6(f):	
1. the urban zoning is required to provide sufficient development capacity to meet the expected demand for housing or business land in the district;	
2. there are no other reasonably practicable and feasible options for providing the required development capacity; and	
3. the benefits of rezoning outweigh the costs associated with the loss of highly productive land.	

Natural hazards	
KFO's site is subject to a flood hazard (as modelled by Northland Regional Council).	
Surrounding land is also subject to flood hazard, namely land north and adjacent to Waipetakoura River.	
A conceptual design for a floodway across KFO's site shows that urban development within the site will be resilient to the impact of flooding if the floodway is built. (KFO's submission is supported by a Flood Scheme Investigation from e2. e2 prepared conceptual designs for a floodway that will convey floodwaters along the existing overland flow patch.)	
The estimated effects off-site from the conceptual design of the floodway are less than minor in terms of flow rates, peak water levels, flood duration, and peak flow velocity.	
Any areas of concern can be managed through the future detailed design process, including by incorporation of e2's design recommendations.	
In its Flood Scheme Investigation, e2 modelled flood patterns, flood extents and flood levels during 10% AEP, 2% AEP and 1% AEP +CC flood events. e2's flood modelling is a reliable basis for understanding flood risk and investigate/test design options to manage flood flows on site.	
Infrastructure (three waters) servicing	
Because KFO's site is currently rural it is not serviced by reticulated wastewater and drinking water networks.	
There are mitigation measures available to ensure stormwater effects from urban development (increased peak runoff rate, increased runoff volume, and potential for contamination) will be mitigated.	
There is no capacity in the existing wastewater network and treatment plant.	
KFO's submission is supported by an Infrastructure Servicing Report by Infer that includes an interim solution for on-site wastewater disposal. The interim solution shows there are options available for on-site wastewater disposal to enable urban development until a wider Council wastewater system becomes available.	
There is no spare capacity in the Council's drinking water system.	

The Infrastructure Servicing Report identifies a raw water supply from Kerikeri Irrigation Company's northern dam. The report's solution shows there are options available for water supply to enable urban development.	
The Infrastructure Servicing Report illustrates that there are viable infrastructure (three waters) servicing options available to enable urban development of site. These servicing options can be particularised through subsequent consenting process.	
Transport infrastructure	
KFO's submission is supported by an Integrated Transport Assessment by team traffic that assesses four options for connections to the Kerikeri-Waipapa urban area. Each of the four options realise the following transport benefits: 1. Network resilience for SH10. 2. A more comprehensive network of direct active mode connections between Kerikeri and Waipapa. 3. Development between the two recognised growth nodes of the region (Kerikeri and Waipapa).	
Each of the four connection options will require construction of a new intersection on SH10. The ITA proposes a roundabout located at the intersection of SH10 and Puketotara Road. A concept design shows that the proposed roundabout can be built within land available in the existing road reserve and subject site. This has been discussed with NZTA.	
Positive outcomes	
KFO's submission provides an opportunity for a comprehensive, master planned development.	
KFO's submission provides an opportunity to plan for and fund infrastructure upgrades in a coordinated manner.	
KFO's submission provides an opportunity to ensure land use and development between Kerikeri and Waipapa is well planned and results in an appropriate land use outcome for these townships as well as Far North as a District.	

Other technical disciplines	
Based on the Geotechnical Suitability Report for District Plan Review prepared by Land Development Engineering, the site is suitable for urban development from a geotechnical perspective.	
Based on the Preliminary Site Investigation by NZ Environmental, the site is suitable for urban development from a contaminated land perspective.	
Based on the Preliminary Archaeological Appraisal prepared by Origin Archaeology, the site is suitable for urban development from an archaeological perspective.	
Based on the High level ecological constraints analysis, there is nothing from an ecological perspective that suggests the site is not suitable for an urban zone. Typically resource consents in future may require further ecological inputs and these can be resolved at that time	

29 April 2025

Attention: James Witham

Far North District Council
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Kaikohe 0440

By email to: james.witham@fndc.govt.nz

Copies to: tammy.wooster@fndc.govt.nz, sarah.trinder@fndc.govt.nz and
tim.fischer@simpsongrierson.com

Dear James

KIWIFRESH ORANGE COMPANY LIMITED SUBMISSION ON THE PDP

1. Thank you for your letter dated 4 April 2025. We appreciate Council's engagement with the further information submitted by KFO, and the progress made to clarify issues that could arise from the proposal.
2. In the interests of furthering clarity and issues-based engagement, please find **enclosed**:
 - (a) A response to Council's requests for further information (**Appendix A**).
 - (b) Additional comments in light of Council's response to KFO's issues analysis (**Appendix B**).
3. While we appreciate the Council's desire to fully understand the proposal, we consider that some of the information requested is beyond the scope of what needs to be addressed at planning stage and would more appropriately be addressed as part of detailed resource consenting and land development. Other responses are work in progress or best directed to the parties' respective experts during conferencing.
4. In your letter you mentioned that the response to the issues identified by KFO (in Appendix B) should not be taken as acceptance by the Council that those are the only issues. If the Council has identified other issues, this engagement process is the time to discuss them to ensure a technically robust and efficient evidence exchange and subsequent hearings process. We would be grateful if you could advise if the Council has identified other outstanding issues.

Extension to KFO's evidence on Topic 15D

5. Thank you for advising that the Council is flexible regarding the timing of receipt of evidence and information.
6. KFO intends to seek a formal extension for the filing of its evidence on Topic 15D, so that the Panel is aware of when evidence will be filed and that further submitters are not disadvantaged. The proposed extension serves multiple purposes:
 - (a) it provides additional time for direct engagement between KFO and the Council;
 - (b) it potentially avoids re-litigation of whether Kerikeri / Waipapa is an "urban environment", given the Council's response on that matter will be formally provided on 23 June 2025; and

- (c) it will enable KFO to address the outcome of Te Patukurea – Spatial Plan for Kerikeri / Waipapa (to the extent it is relevant to the PDP) in KFO's evidence in chief – we understand that the Spatial Plan will be considered at a Council meeting in June.
- 7. Accordingly, KFO intends to seek:
 - (a) an extension for its evidence on Topic 15D to 7 July 2025;
 - (b) further submitters have an extension to 4 August; and
 - (c) there would otherwise be no changes to the hearing schedule (i.e., the s42A report would be due by 8 September).
- 8. Could you please advise if the Council supports the proposed extension or has any comments?

Traffic modelling

- 9. You may already be aware that Mr Phillip Brown of TEAM Traffic has contacted the Council's experts to see whether the proposal could be included in modelling being undertaken by the Council (at KFO's cost and subject to confirmation) and understand the basis and scope of the transport model Council is using to inform its reporting. We propose to let the transport engineers agree on the necessary inputs for modelling, but please contact us if you wish to discuss this matter.

Suggested approach to conferencing and dates

- 10. Your questions in Appendix A and responses to our issues analysis in Appendix B reveal several points of disagreement between KFO and the Council on technical matters.
- 11. Rather than us exchanging letters on these issues, we suggest that these points of disagreement serve as the basis for expert conferencing to narrow or resolve issues now. We consider that engagement between subject matter experts will be more efficient and ultimately more helpful for the Hearings Panel.
- 12. We propose the following approach for expert conferencing:
 - (a) Based on the issues from our exchanges in Appendix A and B, the expert topics for conferencing would be:
 - (i) Economics
 - (ii) Infrastructure (water supply and wastewater)
 - (iii) Flooding and stormwater (capturing issues related to the floodway and stormwater)
 - (iv) Transport
 - (v) Planning
 - (b) For each topic, we would prepare a draft conference agenda with input from KFO's experts, which would be agreed in advance with the Council and its experts. We expect the conference agenda would largely reflect the points of disagreement in Appendix A and Appendix B.
 - (c) Based on the list of experts you have provided, it appears that all experts have suitable experience to participate in conferencing without facilitation. We would provide a suitable recorder to attend the conference and prepare a joint witness statement under the experts' direction and ensure there is an appropriately equipped venue or logistics for remote attendance.
 - (d) The expert conference would be carried out in accordance with section 9 of the Environment Court Practice Note 2023 to the extent practicable to a Council process, including but not limited to:

- (i) 9.4(c): An expert conference is confidential to the experts who participate in it. There shall be no communication of what took place during the expert conference or of its outcome other than the joint witness statement produced by the experts.
 - (ii) 9.4(h): In conferring with another expert witness and in preparing a joint witness statement, an expert witness must exercise independent and professional judgment and must not act on the instruction or direction of any person to present an opinion or to withhold or avoid agreement.
 - (e) Where conferencing occurs prior to evidence exchange, it is common for some information to be provided such as a 'will-say' statement. KFO's experts have provided the reports that were submitted with KFO's submissions. In the interest of efficiency, we do not suggest that the Council's experts produce 'will-say' statements, but instead provide a short summary of their views on the issues as set out in the conference agenda.
 - (f) The intention is that the experts would produce a joint witness statement that can be provided to the Panel as evidence.
13. In terms of dates, we propose a window for conferencing to occur between **12 and 23 May**. This provides us with time to confirm the conferencing approach and to prepare and agree agenda.
14. We would appreciate your feedback on the approach, dates, and expert topics.

Yours faithfully
Wynn Williams



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APPENDIX A – REQUEST FOR FURTHER INFORMATION

Question	Response
Concept	
Will you align all technical documents and assessments?	We interpret this question as referring to the projected yield. The technical documents are already aligned: • Mr Thompson (Urban Economics) considers that a medium yield scenario is most likely, comprising approximately 1,830 dwellings on 60.9 ha (net) of residential land.¹ • The Integrated Transport Assessment generates traffic estimates based on medium to high scenarios, meaning its assessment of the potential traffic generation is expected to be conservatively high.² • The Infrastructure Servicing Report assesses servicing based on development comprising 1,500 to 2,000 dwellings.³ If the Council has other concerns about alignment between documents or assessments, please advise what those concerns are.
How to strategically plan infrastructure with such wide bands of possible development?	The Infrastructure Servicing Report (ISR) assesses servicing based on development comprising 1,500 to 2,000 dwellings. It has assessed the demand for infrastructure through time at various levels of development (Time 1 to Time 10). For wastewater, there are two options: integrate with the Council's system or develop a standalone solution. KFO would work closely with the Council to integrate, however that is not always feasible, hence the assessment of a standalone option. The ISR confirms that there is enough land to be set aside for an on-site land disposal system, which can be decommissioned when a wider Council wastewater system becomes available. For a plan change, it is necessary only to establish feasibility, which the ISR does.

¹ 4(h) Economic Assessment, page 9.

² 4(m) - Integrated Transport Assessment, page 219

³ 4(i) Infrastructure Servicing Report, page 4.

Question	Response
	A similar approach applies for water supply: work with the Council to develop an integrated system but be prepared to provide a dedicated bulk supply system if required and ensure it can be integrated with the sider municipal system at a later date. If anything, it shows that infrastructure provision for this rezoning proposal will be superior as it provides an option that would enable housing supply without reliance on Council building infrastructure to meet demand.
Economics	
Given the HBA and other information coming to light, for example census data, will this be updated?	All reports will be updated through evidence to ensure the latest information is considered and can be discussed during expert caucusing.
Flood Model / Stormwater	
Why is it appropriate to remove the flood overlay from the subject site at this time?	KFO is open to discussing the planning approach to the flood overlay in light of the proposal and the floodway that the proposed provisions require. The original proposal was to remove the overlay, but a more nuanced approach may be appropriate to recognise that the hazard remains (until addressed through the proposed floodway), while also avoiding the overlay provisions creating consenting difficulties after the floodway is established.
What happens when the flood event exceeds design capacity? Ie residual risk/flow path?	The Northland Regional Council's wider catchment flood models only model flooding up to a 1% AEP (including the effects of climate change). ⁴ The floodway has been conceptually designed for a 1% AEP flood event, with land allocated for the floodway to be located. As the Flood Scheme Investigation Points out, further detailed design will be required through resource consents to respond to a number of identified specific design matters. ⁵
Will stormwater discharge use have downstream quality/quantity effects?	Development of the site would result in an increase in impermeable areas and therefore an increase in stormwater runoff. The floodway can

⁴ 4(g) – Flood Scheme Investigation, section 3.

⁵ Ibid, section 5.3.

Question	Response
	accommodate stormwater, provided the rate of discharge is equivalent to the existing modelled runoff from the area to be discharge. Therefore, stormwater design needs to ensure the rate of stormwater does not increase. According to the Infrastructure Servicing Report, this can be achieved by increasing the length of time during which stormwater is discharged, which is a common method.⁶ The Infrastructure Servicing Report has considered stormwater mitigations for the site that identify mitigations for runoff rate, runoff volume and quality.⁷
Has the stormwater discharge to the floodway been considered in the model? Will it treat or require treatment before discharge?	The floodway does not discuss the management of on-site stormwater from either a water quantity or water quality perspective. This is instead dealt within the Infrastructure Servicing Report, as above.
NRC – RPS Hazards direction – more through assessment may be useful in evidence	Noted.
Who owns floodway/ maintains it? If vested, when?	The land would be vested in Council and maintained by the Council (potentially funded through a targeted rate). KFO is eager to discuss and understand the Council's preference for timing of vesting. In any event this level of detail is typically addressed at resource consent stage.
Will the floodway be fit for purpose for reserves, ie mowable, dry, safe when wet? How often will be wet?	It is anticipated that the floodway will be fit for an informal recreation reserve and will be mowable, dry and safe when wet. This is a matter of detail that can be secured at resource consent stage and would need to achieve council standards that apply at the time.
Is it likely that some safety provisions will need to be considered in the design/operation of the floodway?	Noted and KFO is willing to discuss this.

⁶ 4(i) – Infrastructure Servicing report at section 3.1

⁷ Ibid.

Question	Response
Transport	
Are designations required for land that is required for the roundabout, bridge over the river and other roads? What is the estimated cost of acquiring land and designing and building transport infrastructure? Who pays?	No. The land is owned by KFO. The road upgrade can be constructed and vested as part of future land development and resource consent processes. A designation is not required.
Has land over the Golf Course been acquired/ evidence provided? – Matter that requires further consideration.	No. KFO has an agreement in principle with the Golf Club and the Golf Club has expressed support to the rezoning. There are several other transport options available, if required.
Has the modelling data been updated as indicated was required in the submission? Has this information been provided, requested?	This work is underway.
How critical is 'network resilience'? How often does SH10 flood? Can this be mitigated other ways? Will this mitigation occur regardless?	Network resilience is critical. No, the floodway would not be built if there is no urban development and alternative roads would not be provided.
Has the most recent LTP been considered, are the documents being updated to take that into account?	All reports will be updated through evidence to ensure the latest information is considered. Expert conferencing can also consider the latest documents.
When are roads programmed to be needed and install, infrastructure timing.	This is a matter of detailed design.
Are upgrades required in the wider catchment as a result of this proposed growth? – Note, related to required network wide modelling as required.	This work is underway.
Fairway drive/ Aranga Road upgrade required? – As above.	This work is underway.
When will we see most probable and practical layout?	The ITA identifies four options for access, all of which have access to SH10 and Waitotara Road. Option 2 is the most probable layout, however all options would be satisfactory. It is not necessary to decide on a final layout until the detailed design phase.
Is all land for proposed connections to existing networks available or are acquisitions required? Note missed messages regarding submitter owned land, structure plans and transport assessment.	Some of the access options would require land from the Golf Club. As noted above, KFO has secured an agreement in principle with the Golf Club. The remaining network would be on KFO land. The ITA shows that the intersection with SH10 can be constructed within land available in the existing road reserve and subject site.⁸

Question	Response
Structure plan	
How many, and what contingent matters need to be provided before development proceeds i.e Floodway, Road Access, Sewage system and disposal area before site can be developed. It would be helpful if these were brought together and summarised once completed. How long will this take to gain approvals/land?	With the exception of the floodway, the contingent matters are no different to any other development. The necessary infrastructure – roading and three waters – are needed to service development. Discussions with the Golf Club are advanced and KFO do not anticipate that access would be a substantial roadblock to development. In any event, the same situation applies when land is rezoned by council through a plan review process.
Unclear what tool, mechanisms and typologies are being used to create affordable housing. What is proposed and how can this be implemented in the provisions of the plan?	Rezoning the land will enable provision of affordable housing because: • The raw land cost of greenfields land is lower than infill land. • There are economies of scale to efficiently produce lots and dwellings. • The area can be masterplanned to offer different housing types and greater densities where appropriate, rather than ad hoc infill development. • Agreements to fund infrastructure can be entered into because there is one land owner / developer. KFO does not consider that planning provisions are the best tool to implement affordable housing. Housing prices are a product of supply / demand dynamics, monetary policy (the cost of borrowing), and construction cost (including land cost). Planning processes cannot control monetary policy, but it can influence housing process by contributing to supply and enabling development of land with lower construction cost. KFO considers that supplying more and lower cost land at higher economies of scale will necessarily provide more affordable housing.
Are there indicative lot sizes and locations?	This can be determined through detailed design and will depend on the outcome of zones applied through the PDP process e.g. what site sizes are provided for the General Residential zone.
Unclear about who pays for what infrastructure and when. What requires compensation for the developer?	See answer below.

Question	Response
Housing estimate a wide band 2500-3000. How does public infrastructure get planned and funded in this instance?	Note the correct yields above.
More details for location of WWTP and disposal areas required. Does this need Designation, who pays/runs?	This can be determined through detailed design.
Indicative earthworks required at conceptual level.	This can be determined through detailed design.
Are affordable housing and retirement village typologies compatible?	Yes. Why would they not be?
Is there any concern reverse sensitivity on a long term or interim basis?	No.
Would any provisions be required to manage transition?	No, consenting decisions and staging will ensure appropriate transition.
Has suitability of 'high density' development along high amenity edges been assessed?	This can be determined through detailed design.
Given significant contingent factors, how long before development can begin and houses be built?	See above.
NPS-HPL	
Does the proposal meet all the 'ands' in NPS HPL? Cl3.6 particularly with other solutions as part of submissions.	Yes. This will be addressed through evidence and legal submissions. There is insufficient land within the PDP to provide sufficient development capacity to meet demand. Moreover, there is very little greenfields development area that is not highly productive land.
Ecology	
Have drains been considered for mudfish. Have the presence of bats been considered?	To consider. Ecological assessments are typically required to inform the resource consent process and it is expected that this requirement will apply to the subject land.
Are there any potential downstream ecological effects of Floodway?	To consider.
Infrastructure	
2ha required for waste water treatment plant and 30 for disposal. What is the capacity/tipping point? Why has this not been identified given the sensitivity effects possible? How much capacity is intended to be provided?	The Infrastructure Service Report identifies the area of land to service the development through time, showing that it is feasible to develop up to 'Time 4' based on a 30 ha area set aside for onsite disposal. 'Time 4' includes up to 840 households. If growth could be progressed, then an off-site disposal

Question	Response
	system or a more effective on-site disposal system would need to be devised. This is, ultimately, a matter for detailed design. The wastewater treatment plan would need to be consented and conditions of consent would enable it to reject connections that exceed its capacity.
Additional 15ha required for bank/diversion along river. “public asset” – do we want this, how much will this cost? Maintenance costs? Vested and compensated?	A rate could be charged for maintenance costs. This area will provide amenity for the public in addition to serving a stormwater function. Reserves including utility reserves, recreational and other reserves are typically vested as part of future land development and subdivision resource consent processes.
How does water system work? How much development is provided for by the plant? Is storage/treatment required? Who's is this? What happens with it after upgrades?	Questions of detailed design.
PAGE 202 – No groundwater assessment – to be provided prior to hearing	Noted.
Page 525 – developer to meet proportional implementation cost?	-
KIC water supply from dam – 3km infrastructure required. Water storage. Pump and treatment required. Who pays/owns infrastructure short and long term, who/ how managed?*	This can be determined through detailed design.
Alternative water required possible bore? Any testing? Any availability? Indicated to occur prior to hearing.	This can be determined through detailed design.
Who will be the water supply authority?	This can be determined through detailed design.
Is there certainty over supply and suitability of bore water. Who treats/ stores/ where? Drinking water provider under regulations.	This can be determined through detailed design.
What happens to legacy systems once reticulated capacity becomes available?	They could be decommissioned or retained for additional capacity in the Council's network. This can be determined through detailed design.
Unclear why Private infrastructure needs to be included in PDP.	-

Question	Response
Gen Res Provisions	
Unclear why private infrastructure needs to be added?	It provides options for the event the Council cannot deliver on infrastructure. This enables development so that housing supply can meet demand.
Consent notices will be required to ensure connection when available.	Any conditions such as consent notices will be determined at the subsequent resource consent stage and will comply with the relevant legislative and plan requirements existing at the time.
584 sh10 frontage residential but floodable? Why not open space? Who will own, for what purpose? Does this area 'benefit' from flood way?	-
Landscape refers to moderate to high density, but no land use provisions are provided.	-
S. 32	
Page 172 – not optimal to zone future urban as there is insufficient capacity in infrastructure. Why? Why not only rezoning area subject to private retic? Why not FUZ until prerequisite infrastructure is provided.*	The NPS-UD requires development capacity to be provided in the short, medium, and long terms. The Economics Assessment says there is sufficient demand for additional residential zoned land over the next 10-years to justify live zoning the entirety of the site. KFO prefers to let the market decide whether there is demand for additional housing, rather than risk artificially constraining supply by a FUZ zone. This is what the NPSUD envisages: providing development capacity with a competitiveness margin to ensure competitive land markets.⁹ In terms of infrastructure provision, subdivision and development consents would need to provide suitable bulk water supply and wastewater solutions. Therefore, the ability to deliver infrastructure is a constrain on development whether or not a planning provision requires it as a pre-requisite. Under the proposed precinct provisions, the first resource consent application for any subdivision, use or development, a Comprehensive Development Plan must be submitted explaining (amongst other things) the infrastructure servicing

⁹ A competitiveness margin is required of tier 1 and tier 2 authorities. However there is no reason why a tier 3 authority would not provide capacity for a competitiveness margin, as not doing so risks undersupplying houses and therefore increasing housing cost.

Question	Response
	requirements, including staging triggers for delivery of development. If infrastructure cannot be delivered, consent may be declined. The ISR identifies several trigger points for required infrastructure at various scales of development to demonstrate what is likely to be required and when. For example, capacity for 311 m³ of potable water would be required to supply and therefore enable 210 households to be built (see 'Time 1'). For wastewater, discharge consents for disposal of treated wastewater and the associated infrastructure would be required before any houses are occupied.
Cultural Assessment	
Has there been any Cultural Impact Assessment, including of the site or sites potentially used for effluent disposal	KFO has engaged with Ngāti Rēhia, who have agreed to provide a Cultural Impact Assessment.¹⁰ KFO is continuing to engage with Mana Whenua and has more recently engaged with Hapu Ropu in relation to the Structure Plan. This issue has not been specifically discussed, however Ngāti Rēhia generally support the proposal.¹¹

¹⁰ 5 – Communication Summary Report at section 3.3.

¹¹ Ibid.

APPENDIX B – ISSUES ANALYSIS

Issues	Council response (agree / disagree – with reasons)	KFO response
Economics		
Kerikeri-Waipapa is an urban environment under the National Policy Statement for Urban Development 2020.	Should Council adopt the Kerikeri/Waipapa spatial plan in June. Kerikeri would become an 'urban environment' under the NPS-UD.	The spatial plan does not decide whether Kerikeri-Waipapa is an urban environment. That is a specific test under the NPS-UD. A spatial plan is a non-statutory document that is used assist in planning the location of urban development.
The Council intends to meet housing demand from projected population growth in the short and medium term through infill development.	Disagree – some upzoning of brownfields is likely in line with the direction of growth in the Spatial Plan	We interpret infill and upzoning of brownfields as meaning the same thing – to intensify development within an existing urban area (i.e. brownfields land).
The Council has not provided for sufficient development capacity in Kerikeri-Waipapa to meet expected demand for housing in the short term, medium term, and long term, because:	Disagree	Issue for witness caucusing
1. Its projections underestimate projected growth; and	N/A	
2. Its projections overestimate the additional housing capacity that is likely to be created through infill development.	N/A	
The Council does not have a financial contributions policy or a development contributions policy. The Council relies on development agreements or rates to fund infrastructure.	Disagree – other funding streams are utilised	What are these other sources and will they provide sufficient funding for the infrastructure needed to fund Council's preferred option for providing development capacity?

Highly productive land		
The proposed rezoning is not an urban rezoning of highly productive land under the National Policy Statement for Highly Productive Land (NPS-HPL).	Disagree	Issue for witness caucusing
If it is, it is not contrary to the NPS-HPL because, under section 3.6(f): 1. the urban zoning is required to provide sufficient development capacity to meet the expected demand for housing or business land in the district;	Disagree	Issue for witness caucusing
2. there are no other reasonably practicable and feasible options for providing the required development capacity; and	Disagree	Issue for witness caucusing
3. the benefits of rezoning outweigh the costs associated with the loss of highly productive land.	Disagree	Issue for witness caucusing
Natural hazards		
KFO's site is subject to a flood hazard (as modelled by Northland Regional Council).	Agree	-
Surrounding land is also subject to flood hazard, namely land north and adjacent to Waipetakoura River.	Agree	-
A conceptual design for a floodway across KFO's site shows that urban development within the site will be resilient to the impact of flooding if the floodway is built. (KFO's submission is supported by a Flood Scheme Investigation from e2. e2 prepared conceptual designs for a floodway that will convey floodwaters along the existing overland flow patch.)	Disagree – further work needed and peer review needed	Issue for witness caucusing
The estimated effects off-site from the conceptual design of the floodway are less than minor in terms of flow rates, peak water levels, flood duration, and peak flow velocity.	Disagree – Peer review needed	Issue for witness caucusing
Any areas of concern can be managed through the future detailed design process, including by incorporation of e2's design recommendations.	Disagree – Peer review needed	Issue for witness caucusing

In its Flood Scheme Investigation, e2 modelled flood patterns, flood extents and flood levels during 10% AEP, 2% AEP and 1% AEP +CC flood events. e2's flood modelling is a reliable basis for understanding flood risk and investigate/test design options to manage flood flows on site.	Disagree – Peer review needed	Issue for witness caucusing
Infrastructure (three waters) servicing		
Because KFO's site is currently rural it is not serviced by reticulated wastewater and drinking water networks.	Disagree – may be other reasons	What other reasons? Why would services be provided for rural land?
There are mitigation measures available to ensure stormwater effects from urban development (increased peak runoff rate, increased runoff volume, and potential for contamination) will be mitigated.	It is unclear at this stage what is required and proposed	Issue for witness caucusing.
There is no capacity in the existing wastewater network and treatment plant.	Beca Infrastructure report is the latest information we have	Issue for witness caucusing
KFO's submission is supported by an Infrastructure Servicing Report by Infer that includes an interim solution for on-site wastewater disposal. The interim solution shows there are options available for on-site wastewater disposal to enable urban development until a wider Council wastewater system becomes available.	Disagree – more information needed	Issue for witness caucusing
There is no spare capacity in the Council's drinking water system.	Beca Infrastructure report is the latest information we have	Issue for witness caucusing
The Infrastructure Servicing Report identifies a raw water supply from Kerikeri Irrigation Company's northern dam. The report's solution shows there are options available for water supply to enable urban development.	Agree – options but no certainty	Issue for witness caucusing
The Infrastructure Servicing Report illustrates that there are viable infrastructure (three waters) servicing options available to enable urban development of site. These servicing options can be particularised through subsequent consenting process.	Unclear	Issue for witness caucusing

Transport infrastructure		
KFO's submission is supported by an Integrated Transport Assessment by team traffic that assesses four options for connections to the Kerikeri-Waipapa urban area. Each of the four options realise the following transport benefits: 1. Network resilience for SH10. 2. A more comprehensive network of direct active mode connections between Kerikeri and Waipapa. 3. Development between the two recognised growth nodes of the region (Kerikeri and Waipapa).	Disagree – uncertainty around 'Integrated'. Transport expert has indicated what additional information is going to be provided.	Issue for witness caucusing
Each of the four connection options will require construction of a new intersection on SH10. The ITA proposes a roundabout located at the intersection of SH10 and Puketotara Road. A concept design shows that the proposed roundabout can be built within land available in the existing road reserve and subject site. This has been discussed with NZTA.	Disagree – as per above.	Issue for witness caucusing
Positive outcomes		
KFO's submission provides an opportunity for a comprehensive, master planned development.	Unclear	-
KFO's submission provides an opportunity to plan for and fund infrastructure upgrades in a coordinated manner.	Unclear	-
KFO's submission provides an opportunity to ensure land use and development between Kerikeri and Waipapa is well planned and results in an appropriate land use outcome for these townships as well as Far North as a District.	Unclear	-
Other technical disciplines		
Based on the Geotechnical Suitability Report for District Plan Review prepared by Land Development Engineering, the site is suitable for urban development from a geotechnical perspective.	Agree – Peer review needed	-

Based on the Preliminary Site Investigation by NZ Environmental, the site is suitable for urban development from a contaminated land perspective.	Agree – Peer review needed	-
Based on the Preliminary Archaeological Appraisal prepared by Origin Archaeology, the site is suitable for urban development from an archaeological perspective.	Agree – Peer review needed	-
Based on the High level ecological constraints analysis, there is nothing from an ecological perspective that suggests the site is not suitable for an urban zone. Typically resource consents in future may require further ecological inputs and these can be resolved at that time	Disagree further information needed	Issue for witness caucusing.

From: James Witham <James.Witham@fndc.govt.nz>
Sent: Thursday, 15 May 2025 12:19 PM
To: Elliot Maassen
Cc: Roger Ackers; Neville Dennis ; Steve@homegrownjuice.co.nz; Dennis Corbett; Mike Doesburg; Burnette O'Connor; Tim Fischer; Tammy Wooster; Sarah Trinder
Subject: RE: KFO - Engagement with FNDC to assist evidence preparation [WW-ACTIVE.FID560530]

Thank you Elliot,

For clarity, Council is reserving its position on the value of Expert Conferencing until after written evidence has been received.

Kind regards



James Witham

Team Leader - District Plan

M 272752503 | P 6494015180 | James.Witham@fndc.govt.nz

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Pokapū Kōrero 24-hāora | 24-hour Contact Centre 0800 920 029

fndc.govt.nz



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Sent: Thursday, 15 May 2025 12:08 pm
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Cc: Roger Ackers <Roger.Ackers@fndc.govt.nz>; Neville Dennis <neville@homegrownjuice.co.nz>; Steve@homegrownjuice.co.nz; Dennis Corbett <dencorbett47@gmail.com>; Mike Doesburg <Mike.Doesburg@wynnwilliams.co.nz>; Burnette O'Connor <burnette@thepc.co.nz>; Tim Fischer <Tim.Fischer@simpsongrierson.com>; Tammy Wooster <Tammy.Wooster@fndc.govt.nz>; Sarah Trinder <Sarah.Trinder@fndc.govt.nz>
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Kia ora James,

Thank you for your email.

Timetabling

Thank you for the amended timetable that Council staff could support. KFO has reviewed this timetable and decided to seek amended directions for all its evidence to be filed by 30 June, with further submitter evidence to be filed by 14 July. The reasons are as follows:

1. KFO wishes to present its evidence a single package, allowing any matters requiring combined expert analysis to be addressed together.
2. One reason for the revised timetable is to allow KFO to address matters arising from the spatial plan decision, due on 23 June. The spatial plan decision affects more than just economics and planning.
3. The Council will still have over two full months to respond to KFO's evidence.

We acknowledge staff's concern about responding to numerous rezoning requests. However, unless staff are considering all evidence simultaneously, they could presumably sequence their review of KFO's evidence without significant disruption.

We intend to file a memorandum by the end of this week. If you have any, please advise of changes to the Council's position from your email below.

Expert conferencing

Thank you for accommodating expert conferencing in July and August. KFO is content with deferring conferencing to this time.

Ngā mihi
Elliot



Elliot Maassen

Senior Associate
Wynn Williams

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From: James Witham <James.Witham@fndc.govt.nz>

Sent: Friday, 9 May 2025 1:29 PM

To: Elliot Maassen <elliott.maassen@wynnwilliams.co.nz>

Cc: Roger Ackers <Roger.Ackers@fndc.govt.nz>; Neville Dennis <neville@homegrownjuice.co.nz>; Steve@homegrownjuice.co.nz; Dennis Corbett <dencorbett47@gmail.com>; Mike Doesburg <Mike.Doesburg@wynnwilliams.co.nz>; Burnette O'Connor <burnette@thepc.co.nz>; Tim Fischer <Tim.Fischer@simpsongrierson.com>; Tammy Wooster <Tammy.Wooster@fndc.govt.nz>; Sarah Trinder <Sarah.Trinder@fndc.govt.nz>

Subject: RE: KFO - Engagement with FNDC to assist evidence preparation [WW-ACTIVE.FID560530]

Thank you for your letter dated 29 April 2025 proposing a timetable extension and expert conferencing for Topic 15D.

Your letter proposes to amend the timetable as follows:

- Extend the date for KFO's evidence from 16 June to 7 July i.e. an extension of 3 weeks (being 2 weeks after Council staff's response on the "urban environment" issue)
- Extend the date for the further submitters' evidence from 14 July to 4 August i.e. an extension of 3 weeks (being commensurate with the KFO extension)
- The date for the s 42A report would remain unchanged i.e. 8 September.

While Council staff wish to reasonably accommodate KFO's request, staff are concerned that it results in a compressed response time for the Council team during a period of high workload due to the number of rezoning requests. The requested extension goes further than necessary because much of the evidence should not be affected by the "urban environment" issue or the spatial plan. Further, KFO experts have already engaged with the "urban environment" issue and should be in a position to update their evidence on that issue fairly quickly.

For those reasons, Council staff could support the following timetable:

- All KFO evidence, excluding economics and planning, is to be lodged by 16 June 2025
- KFO economics and planning evidence is to be lodged by 30 June 2025
- Further submitter evidence relating to the KFO request is to be lodged by 21 July 2025
- Section 42A report online by 8 September 2025

In relation to expert conferencing, Council staff have provided a list of issues and questions to KFO that we would like to see responded to in submitter evidence. At this stage, staff consider that expert conferencing (to identify areas of agreement or disagreement) would be most efficient and productive if it occurs after submitter evidence has been lodged but prior to issue of the s 42A report on 8 September 2025.

Kind regards



James Witham

Team Leader - District Plan

M 272752503 | P 6494015180 | James.Witham@fndc.govt.nz

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From: Elliot Maassen <elliott.maassen@wynnwilliams.co.nz>

Sent: Tuesday, 6 May 2025 11:51 am

To: James Witham <James.Witham@fndc.govt.nz>

Cc: Roger Ackers <Roger.Ackers@fndc.govt.nz>; Neville Dennis <neville@homegrownjuice.co.nz>;
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Subject: RE: KFO - Engagement with FNDC to assist evidence preparation [WW-ACTIVE.FID560530]

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Morena James,

I understand that you will need to consult with the Council's experts regarding our proposed conferencing. However, I would greatly appreciate it if you could confirm the Council's position on the scheduling of KFO's evidence for Topic 15D.

Ngā mihi
Elliot

**APPENDIX B: CORRESPONDENCE BETWEEN MS O'CONNOR AND MR
WYETH**

From: James Witham <James.Witham@fndc.govt.nz>
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Ngā mihi
Elliot



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<Tim.Fischer@simpsongrierson.com>; Tammy Wooster <Tammy.Wooster@fndc.govt.nz>; Sarah Trinder
<Sarah.Trinder@fndc.govt.nz>

Subject: RE: KFO - Engagement with FNDC to assist evidence preparation [WW-ACTIVE.FID560530]

Thank you for your letter dated 29 April 2025 proposing a timetable extension and expert conferencing for Topic 15D.

Your letter proposes to amend the timetable as follows:

- Extend the date for KFO's evidence from 16 June to 7 July i.e. an extension of 3 weeks (being 2 weeks after Council staff's response on the "urban environment" issue)
- Extend the date for the further submitters' evidence from 14 July to 4 August i.e. an extension of 3 weeks (being commensurate with the KFO extension)
- The date for the s 42A report would remain unchanged i.e. 8 September.

While Council staff wish to reasonably accommodate KFO's request, staff are concerned that it results in a compressed response time for the Council team during a period of high workload due to the number of rezoning requests. The requested extension goes further than necessary because much of the evidence should not be affected by the "urban environment" issue or the spatial plan. Further, KFO experts have already engaged with the "urban environment" issue and should be in a position to update their evidence on that issue fairly quickly.

For those reasons, Council staff could support the following timetable:

- All KFO evidence, excluding economics and planning, is to be lodged by 16 June 2025
- KFO economics and planning evidence is to be lodged by 30 June 2025
- Further submitter evidence relating to the KFO request is to be lodged by 21 July 2025
- Section 42A report online by 8 September 2025

In relation to expert conferencing, Council staff have provided a list of issues and questions to KFO that we would like to see responded to in submitter evidence. At this stage, staff consider that expert conferencing (to identify areas of agreement or disagreement) would be most efficient and productive if it occurs after submitter evidence has been lodged but prior to issue of the s 42A report on 8 September 2025.

Kind regards



James Witham

Team Leader - District Plan

M 272752503 | P 6494015180 | James.Witham@fndc.govt.nz

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From: Elliot Maassen <elliot.maassen@wynnwilliams.co.nz>

Sent: Tuesday, 6 May 2025 11:51 am

To: James Witham <James.Witham@fndc.govt.nz>

Cc: Roger Ackers <Roger.Ackers@fndc.govt.nz>; Neville Dennis <neville@homegrownjuice.co.nz>; Steve@homegrownjuice.co.nz; Dennis Corbett <dencorbett47@gmail.com>; Mike Doesburg <Mike.Doesburg@wynnwilliams.co.nz>; Burnette O'Connor <burnette@thepc.co.nz>; Tim Fischer <Tim.Fischer@simpsongrierson.com>; Tammy Wooster <Tammy.Wooster@fndc.govt.nz>; Sarah Trinder <Sarah.Trinder@fndc.govt.nz>

Subject: RE: KFO - Engagement with FNDC to assist evidence preparation [WW-ACTIVE.FID560530]

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Morena James,

I understand that you will need to consult with the Council's experts regarding our proposed conferencing. However, I would greatly appreciate it if you could confirm the Council's position on the scheduling of KFO's evidence for Topic 15D.

Ngā mihi
Elliot

**Elliot Maassen**

Senior Associate
Wynn Williams

☎ P +64 9 300 2600

🌐 www.wynnwilliams.co.nz

📠 M +64 20 40992182

🌐 Connect with us on LinkedIn

From: Elliot Maassen

Sent: Tuesday, 29 April 2025 1:38 PM

To: James Witham <James.Witham@fndc.govt.nz>

Cc: Roger Ackers <Roger.Ackers@fndc.govt.nz>; Neville Dennis <neville@homegrownjuice.co.nz>; Steve@homegrownjuice.co.nz; Dennis Corbett <dencorbett47@gmail.com>; Mike Doesburg <Mike.Doesburg@wynnwilliams.co.nz>; Burnette O'Connor <burnette@thepc.co.nz>; Tim Fischer <Tim.Fischer@simpsongrierson.com>; Tammy Wooster <Tammy.Wooster@fndc.govt.nz>; Sarah Trinder <Sarah.Trinder@fndc.govt.nz>

Subject: RE: KFO - Engagement with FNDC to assist evidence preparation [WW-ACTIVE.FID560530]

Kia ora James,

Please find **attached** in response to your letter.

Ngā mihi
Elliot

**Elliot Maassen**

Senior Associate
Wynn Williams

☎ P +64 9 300 2600

🌐 www.wynnwilliams.co.nz

📠 M +64 20 40992182

🌐 Connect with us on LinkedIn

From: James Witham <James.Witham@fndc.govt.nz>

Sent: Friday, 4 April 2025 2:39 PM

To: Elliot Maassen <elliott.maassen@wynnwilliams.co.nz>; Tammy Wooster <Tammy.Wooster@fndc.govt.nz>; Sarah Trinder <Sarah.Trinder@fndc.govt.nz>

Cc: Roger Ackers <Roger.Ackers@fndc.govt.nz>; Neville Dennis <neville@homegrownjuice.co.nz>; Steve@homegrownjuice.co.nz; Dennis Corbett <dencorbett47@gmail.com>; Mike Doesburg <Mike.Doesburg@wynnwilliams.co.nz>; Burnette O'Connor <burnette@thepc.co.nz>; Tim Fischer <Tim.Fischer@simpsongrierson.com>

Subject: RE: KFO - Engagement with FNDC to assist evidence preparation [WW-ACTIVE.FID560530]

Kia Ora Elliot, and others,

Please find attached Council's response your previous correspondence. We acknowledge the progress made and the email received from Burnette earlier in the week,

Kind regards

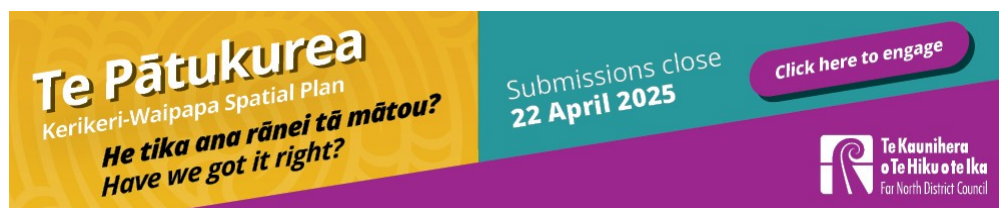
**James Witham**

Team Leader - District Plan

M 272752503 | P 6494015180 | James.Witham@fndc.govt.nz

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From: Elliot Maassen <elliot.maassen@wynnwilliams.co.nz>

Sent: Friday, 7 March 2025 12:35 pm

To: James Witham <James.Witham@fndc.govt.nz>; Tammy Wooster <Tammy.Wooster@fndc.govt.nz>; Sarah Trinder <Sarah.Trinder@fndc.govt.nz>

Cc: Roger Ackers <Roger.Ackers@fndc.govt.nz>; Neville Dennis <neville@homegrownjuice.co.nz>; Steve@homegrownjuice.co.nz; Dennis Corbett <dencorbett47@gmail.com>; Mike Doesburg <Mike.Doesburg@wynnwilliams.co.nz>; Burnette O'Connor <burnette@thepec.co.nz>

Subject: RE: KFO - Engagement with FNDC to assist evidence preparation [WW-ACTIVE.FID560530]

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Kia ora James, Tammy, and Sarah,

Please find **attached** a letter on behalf of Kiwi Fresh Orange Company Limited. The purpose of the letter is to provide KFO's response to the further information requested, identify further issues that may arise, and set the platform for issues-based engagement. We would appreciate your response to the various matters set out in the letter.

Kind regards,
Elliot



Elliot Maassen
Associate
Wynn Williams

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 **M** +64 20 40992182

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From: James Witham <James.Witham@fndc.govt.nz>

Sent: Friday, 28 February 2025 12:03 PM

To: Burnette O'Connor <burnette@thepec.co.nz>; Tammy Wooster <Tammy.Wooster@fndc.govt.nz>

Cc: Roger Ackers <Roger.Ackers@fndc.govt.nz>; Neville Dennis <neville@homegrownjuice.co.nz>; Steve@homegrownjuice.co.nz; Dennis Corbett <dencorbett47@gmail.com>; Elliot Maassen <elliot.maassen@wynnwilliams.co.nz>; Mike Doesburg <Mike.Doesburg@wynnwilliams.co.nz>; Sarah Trinder <Sarah.Trinder@fndc.govt.nz>

Subject: RE: KFO - Engagement with FNDC to assist evidence preparation

Good Afternoon Burnette,

The minutes are attached as requested. However, I am not satisfied at this point that they are in an appropriate state at this point in time. Therefore, I have left them as draft. However, I have attached my notes which I think will be more helpful in terms of some of the detail requested and addressed by Council at the meeting. I note we are working through an appropriate process regarding discussions around a developer agreement and hope to update you early next week on that matter.

I'm happy to talk through clarifications on the information being distributed today.

Kind regards



James Witham

Team Leader - District Plan

M 0272752503 | P +6494015180 | James.Witham@fndc.govt.nz

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fndc.govt.nz



From: Burnette O'Connor <burnette@thepec.co.nz>

Sent: Friday, 28 February 2025 9:39 am

To: James Witham <James.Witham@fndc.govt.nz>; Tammy Wooster <Tammy.Wooster@fndc.govt.nz>

Cc: Roger Ackers <Roger.Ackers@fndc.govt.nz>; Neville Dennis <neville@homegrownjuice.co.nz>;
Steve@homegrownjuice.co.nz; Dennis Corbett <dencorbett47@gmail.com>; elliott.maassen@wynnwilliams.co.nz;
Mike Doesburg <Mike.Doesburg@wynnwilliams.co.nz>; Sarah Trinder <Sarah.Trinder@fndc.govt.nz>

Subject: RE: KFO - Engagement with FNDC to assist evidence preparation

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Perfect thanks James.

Much appreciated.

Ngā mihi / Kind regards



Burnette O'Connor

Director | Planner BRep (Hons), MNZPI and RMLA



M: +64-21-422-346 W: www.thepec.co.nz E: burnette@thepec.co.nz

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From: James Witham <James.Witham@fndc.govt.nz>

Sent: Friday, February 28, 2025 9:34 AM

To: Burnette O'Connor <burnette@thepec.co.nz>; Tammy Wooster <Tammy.Wooster@fndc.govt.nz>

Cc: Roger Ackers <Roger.Ackers@fndc.govt.nz>; Neville Dennis <neville@homegrownjuice.co.nz>;
Steve@homegrownjuice.co.nz; Dennis Corbett <dencorbett47@gmail.com>; elliott.maassen@wynnwilliams.co.nz;
Mike Doesburg <Mike.Doesburg@wynnwilliams.co.nz>; Sarah Trinder <Sarah.Trinder@fndc.govt.nz>

Subject: RE: KFO - Engagement with FNDC to assist evidence preparation

Good Morning Burnette,

I have received these combined notes this morning and are currently going through them. They will be with this before lunch.



James Witham

Team Leader - District Plan

M 0272752503 | P +6494015180 | James.Witham@fndc.govt.nz



From: Burnette O'Connor <burnette@thepec.co.nz>

Sent: Friday, 28 February 2025 9:25 am

To: Tammy Wooster <Tammy.Wooster@fndc.govt.nz>

Cc: Roger Ackers <Roger.Ackers@fndc.govt.nz>; Neville Dennis <neville@homegrownjuice.co.nz>; Steve@homegrownjuice.co.nz; Dennis Corbett <dencorbett47@gmail.com>; elliott.maassen@wynnwilliams.co.nz; Mike Doesburg <Mike.Doesburg@wynnwilliams.co.nz>; James Witham <James.Witham@fndc.govt.nz>; Sarah Trinder <Sarah.Trinder@fndc.govt.nz>

Subject: RE: KFO - Engagement with FNDC to assist evidence preparation

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Hi Tammy,

Could you, James or Sarah please send through the minutes recorded by AI from our meeting on Monday afternoon. We have a scheduled meeting early this afternoon.

Many thanks and I hope you have all had a great week thus far.

Ngā mihi / Kind regards



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Burnette O'Connor

Director | Planner BRep (Hons), MNZPI and RMLA



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From: Tammy Wooster <Tammy.Wooster@fndc.govt.nz>

Sent: Friday, February 21, 2025 5:25 PM

To: Burnette O'Connor <burnette@thepec.co.nz>

Cc: Roger Ackers <Roger.Ackers@fndc.govt.nz>; Neville Dennis <neville@homegrownjuice.co.nz>; Steve@homegrownjuice.co.nz; Dennis Corbett <dencorbett47@gmail.com>; elliott.maassen@wynnwilliams.co.nz; Mike Doesburg <Mike.Doesburg@wynnwilliams.co.nz>; James Witham <James.Witham@fndc.govt.nz>; Sarah Trinder <Sarah.Trinder@fndc.govt.nz>

Subject: RE: KFO - Engagement with FNDC to assist evidence preparation

Hi Burnette

Thank you for circulating a draft agenda. We are happy to discuss the matters you have raised, but would like to suggest a change in order

- What is the council timeframe for seeking these technical inputs.
- Is council willing for the KFO experts to engage with the council experts?
- If so KFO recommends a process whereby experts engage and produce Joint Expert Witness Statements setting out areas of agreement, areas of disagreement and any related outcomes of meetings. The JWS can then be provided to the Panel as part of the s42A report and expert evidence.

- Who are the experts that council is using to report on the KFO submission.
- At a high level, what technical issues does the Council have a concern with (if any)?
- What, from the Council's perspective, are the key technical issues with the proposed rezoning sought by the KFO submission?
- Setting of times for experts to meet and the process and timeframes for reporting back

We look forward to seeing you all on Monday. Once you confirm if you are happy with our proposed changes, I will send out the formal invite that will include the agreed agenda.

Regards



Tammy Wooster

Manager - Integrated Planning

M 6421406549 | P 6494070447 | Tammy.Wooster@fndc.govt.nz

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From: Burnette O'Connor <burnette@theipc.co.nz>

Sent: Friday, 21 February 2025 3:13 pm

To: Tammy Wooster <Tammy.Wooster@fndc.govt.nz>

Cc: Roger Ackers <Roger.Ackers@fndc.govt.nz>; Neville Dennis <neville@homegrownjuice.co.nz>; Steve@homegrownjuice.co.nz; Dennis Corbett <dencorbett47@gmail.com>; elliott.maassen@wynnwilliams.co.nz; Mike Doesburg <Mike.Doesburg@wynnwilliams.co.nz>; James Witham <James.Witham@fndc.govt.nz>; Sarah Trinder <Sarah.Trinder@fndc.govt.nz>

Subject: RE: KFO - Engagement with FNDC to assist evidence preparation

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Good afternoon everyone,

In advance of our Monday afternoon meeting, I enclose a suggested agenda. FNDC team if you have any comments / changes / feedback please let us know so we can finalise ahead of Monday.

Proposed Agenda:

- What, from the Council's perspective, are the key technical issues with the proposed rezoning sought by the KFO submission?
- At a high level, what technical issues does the Council have a concern with (if any)?
- Who are the experts that council is using to report on the KFO submission.
- What is the council timeframe for seeking these technical inputs.
- Is council willing for the KFO experts to engage with the council experts?
- If so KFO recommends a process whereby experts engage and produce Joint Expert Witness Statements setting out areas of agreement, areas of disagreement and any related outcomes of meetings. The JWS can then be provided to the Panel as part of the s42A report and expert evidence.
- Setting of times for experts to meet and the process and timeframes for reporting back.

I hope everyone has a great weekend – the sun is out.

Ngā mihi / Kind regards



Burnette O'Connor

Director | Planner BRep (Hons), MNZPI and RMLA



M: +64-21-422-346 **W:** www.thepc.co.nz **E:** burnette@thepc.co.nz

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From: Tammy Wooster <Tammy.Wooster@fndc.govt.nz>

Sent: Thursday, 20 February 2025 4:27 pm

To: Burnette O'Connor <burnette@thepc.co.nz>

Cc: Roger Ackers <Roger.Ackers@fndc.govt.nz>; Neville Dennis <neville@homegrownjuice.co.nz>; Steve@homegrownjuice.co.nz; Dennis Corbett <dencorbett47@gmail.com>; elliott.maassen@wynnwilliams.co.nz; Mike Doesburg <Mike.Doesburg@wynnwilliams.co.nz>; James Witham <James.Witham@fndc.govt.nz>; Sarah Trinder <Sarah.Trinder@fndc.govt.nz>

Subject: RE: KFO - Engagement with FNDC to assist evidence preparation

Afternoon Burnette

Thank you for the quick confirmation and also working around our commitments that day.

We look forward to seeing the draft agenda. I will sort out a formal invite and room booking.

Regards



Tammy Wooster

Manager - Integrated Planning

M 6421406549 | P 6494070447 | Tammy.Wooster@fndc.govt.nz

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From: Burnette O'Connor <burnette@thepc.co.nz>

Sent: Thursday, 20 February 2025 4:12 pm

To: Tammy Wooster <Tammy.Wooster@fndc.govt.nz>

Cc: Roger Ackers <Roger.Ackers@fndc.govt.nz>; Neville Dennis <neville@homegrownjuice.co.nz>; Steve@homegrownjuice.co.nz; Dennis Corbett <dencorbett47@gmail.com>; elliott.maassen@wynnwilliams.co.nz; Mike Doesburg <Mike.Doesburg@wynnwilliams.co.nz>

Subject: RE: KFO - Engagement with FNDC to assist evidence preparation

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Good afternoon Tammy,

My clients have confirmed so we look forward to meeting with you at 4pm on Monday 24th February in Kerikeri.

I will send out an agenda tomorrow morning.

Ngā mihi / Kind regards



Burnette O'Connor

Director | Planner BRep (Hons), MNZPI and RMLA



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From: Tammy Wooster <Tammy.Wooster@fndc.govt.nz>

Sent: Thursday, February 20, 2025 2:24 PM

To: Burnette O'Connor <burnette@thepc.co.nz>

Cc: Roger Ackers <Roger.Ackers@fndc.govt.nz>; Neville Dennis <neville@homegrownjuice.co.nz>; Steve@homegrownjuice.co.nz; Dennis Corbett <dencorbett47@gmail.com>; elliott.maassen@wynnwilliams.co.nz; Mike Doesburg <Mike.Doesburg@wynnwilliams.co.nz>

Subject: RE: KFO - Engagement with FNDC to assist evidence preparation

Good Afternoon Burnette

I've spoken to James and Sarah and all three of us could be available at 4pm on the Monday 24 Feb (which would enable us all to be in person with James normally based in Taupo). I think it would be very good to have the first meeting with everyone in person were possible. .

Please let me know if that would work.

Regards



Tammy Wooster

Manager - Integrated Planning

M 6421406549 | **P** 6494070447 | Tammy.Wooster@fndc.govt.nz

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From: Burnette O'Connor <burnette@thepc.co.nz>

Sent: Wednesday, 19 February 2025 4:23 pm

To: Tammy Wooster <Tammy.Wooster@fndc.govt.nz>

Cc: Roger Ackers <Roger.Ackers@fndc.govt.nz>; Neville Dennis <neville@homegrownjuice.co.nz>; Steve@homegrownjuice.co.nz; Dennis Corbett <dencorbett47@gmail.com>; elliott.maassen@wynnwilliams.co.nz; Mike Doesburg <Mike.Doesburg@wynnwilliams.co.nz>

Subject: KFO - Engagement with FNDC to assist evidence preparation

Importance: High

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Good afternoon Tammy,

Many thanks for the letter received yesterday, Tuesday 18 February. KFO would like to meet with you at the earliest time we can coordinate, to work out a process for engagement of KFO experts with council experts. Ideally, we would identify the experts on both sides and a timeframe for them to engage, as well as a process for recording discussions between experts.

The KFO team is available, on the dates set out below, to meet with you in person at the FNDC office in Kerikeri. Could you please advise your availability for these times to meet so we lock a date and time in.

- Late afternoon Monday 24th Feb
- Thursday 6 March
- Wednesday 12th March
- Thursday 13 March

Could you please let us know what works for you in terms of a date and time for a meeting.

I look forward to hearing from you.

Ngā mihi / Kind regards



Burnette O'Connor

Director | Planner BRep (Hons), MNZPI and RMLA



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From: Tammy Wooster <Tammy.Wooster@fndc.govt.nz>

Sent: Tuesday, February 18, 2025 12:19 PM

To: Burnette O'Connor <burnette@thepc.co.nz>

Cc: Roger Ackers <Roger.Ackers@fndc.govt.nz>; Neville Dennis <neville@homegrownjuice.co.nz>; Steve@homegrownjuice.co.nz; Dennis Corbett <dencorbett47@gmail.com>; elliott.maassen@wynnwilliams.co.nz; Mike Doesburg <Mike.Doesburg@wynnwilliams.co.nz>

Subject: Response from the panel

Good afternoon, Burnette

Thank you for circulating the final minutes.

Please find attached a letter from myself outlining the response we have received from the Chair of the panel and my suggestion for next steps.

After you have read it, please get in touch. If you are wanting to take up the offer of a meeting with the DP Team, James the team leader is in the district next week and has advised me he would be available to have an in person meeting on Thursday.

Regards



Tammy Wooster

Manager - Integrated Planning

M 6421406549 | **P** 6494070447 | Tammy.Wooster@fndc.govt.nz

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From: Burnette O'Connor <burnette@thepc.co.nz>

Sent: Tuesday, 11 February 2025 3:25 pm

To: Tammy Wooster <Tammy.Wooster@fndc.govt.nz>

Cc: Roger Ackers <Roger.Ackers@fndc.govt.nz>; Neville Dennis <neville@homegrownjuice.co.nz>;

Steve@homegrownjuice.co.nz; Dennis Corbett <dencorbett47@gmail.com>; elliott.maassen@wynnwilliams.co.nz;
Mike Doesburg <Mike.Doesburg@wynnwilliams.co.nz>

Subject: Minutes of Meeting with KFO - 18 December 2024

Importance: High

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Good afternoon Tammy,

Thank you for your comments. I have made a few further minor grammatical changes, otherwise all changes are accepted, and I have attached a pdf Final and the track so you can see what additional changes I made.

Could you also please let me know when we can expect to hear back from the Panel regarding the process for evidence.

Many thanks and I look forward to hearing from you.

Ngā mihi / Kind regards



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